

This section discusses additional topics statutorily required by the California Environmental Quality Act (CEQA) concerning the long-term implications of the proposed General Plan Update. The topics discussed include growth-inducing impacts, significant irreversible environmental changes, including irretrievable commitment of resources, and significant and unavoidable environmental impacts.

7.1 GROWTH-INDUCING IMPACTS

INTRODUCTION

CEQA Guidelines Section 15126.2(d) requires that an Environmental Impact Report (EIR) evaluate the growth-inducing impacts of a proposed action. A growth-inducing impact is defined by the CEQA Guidelines as:

The way in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth . . . It is not assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment.

A project can have direct and/or indirect growth inducement potential. For example, direct growth inducement would result if a project involved construction of new housing. A project would have indirect growth inducement potential if it established substantial new permanent employment opportunities or if it would involve a construction effort with substantial short-term employment opportunities that would indirectly stimulate the need for additional housing and services to support the new employment demand (*Napa Citizens for Honest Government v. Napa County Board of Supervisors*). Similarly, a project would indirectly induce growth if it would remove an obstacle to additional growth and development, such as removing a constraint on a required public service. A project providing an increased water supply in an area where water service historically limited growth could be considered growth-inducing.

The CEQA Guidelines further explain that the environmental effects of induced growth are considered indirect impacts of the proposed action. These indirect impacts or secondary effects of growth may result in significant, adverse environmental impacts. Potential secondary effects of growth include increased demand on other community and public services and infrastructure, increased traffic and noise, and adverse environmental impacts such as degradation of air and water quality, degradation or loss of plant and animal habitat, and conversion of agricultural and open space land to developed uses.

Growth inducement may constitute an adverse impact if the growth is not consistent with, or accommodated by, the land use plans and growth management plans and policies for the area affected. Local land use plans provide for land use development patterns and growth policies that allow for the orderly expansion of urban development supported by adequate urban public services, such as water supply, roadway infrastructure, sewer service, and solid waste service.

COMPONENTS OF GROWTH

The timing, magnitude, and location of land development and population growth in a community are based on various interrelated land use and economic variables. Key variables include regional economic trends, market demand for residential and nonresidential uses, land availability and cost, the availability and quality of transportation facilities and public services,

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proximity to employment centers, the supply and cost of housing, and regulatory policies or conditions. Since the general plan of a community defines the location, type, and intensity of growth, it is the primary means of regulating development and growth in California.

GROWTH EFFECTS OF THE PROJECT

Based on Government Code Section 65300, the proposed General Plan Update is intended to serve as the overall plan for the physical development of the City of Chico. While the General Plan Update does not specifically propose any specific development projects, it does accommodate as well as regulate future population and economic growth of the city that would result in direct and indirect growth-inducing effects.

Implementation of the proposed General Plan Update would refine existing land use designations in the City of Chico and establish new policy provisions, actions, and design guidelines that will guide and manage future development and land uses in the city. This would also include policy direction on roadway facility improvements, public service improvements, and the extension and expansion of utilities. The specific environmental effects resulting from the direct growth effects of proposed land use patterns and associated extension of public services are discussed in Sections 4.1 through 4.14 of this Draft EIR. The following is a discussion of the potential growth-inducing effects of the project.

Population Growth

As part of the development of the proposed General Plan Update, an analysis of residential and nonresidential (retail, commercial, office, industrial, and other uses) demands for the city for the year 2030 was conducted (BAE City of Chico General Plan Update Market Opportunity and Land Absorption Projections [2008]). A comparison of year 2030 demands and total growth potential under the proposed General Plan Update is provided in **Table 4.0-1**. As demonstrated in **Table 4.0-1**, the proposed General Plan Update growth capacity would exceed the City's anticipated needs for year 2030 for both residential and nonresidential growth. However, it is important to note that the proposed General Plan Update does not include any policy provisions that require that the Plan's build-out potential be attained.

As identified in Section 3.0, Project Description, the intent of the proposed General Plan Update is to accommodate anticipated growth through compact, walkable, infill, and mixed-use development, as well as to focus redevelopment along transit corridors and at other key locations. The proposed General Plan Update and its Land Use Diagram would provide for this growth, would minimize outward expansion of the city's boundaries, and would retain the current Butte County Greenline along the western boundary of the city. Thus, growth accommodated under the proposed General Plan Update would be confined to the immediate Chico area and would avoid growth effects of sprawl development patterns. The environmental effects of build-out under the proposed General Plan Update are addressed in the technical sections of this Draft EIR.

Growth Effects Associated with Infrastructure Improvements

The proposed General Plan Update could indirectly induce growth if it would remove an obstacle to additional growth and development, such as removing a constraint on a required public service. The City's infrastructure and public services are largely provided by other public and private service providers that utilize master plans for guiding planned facility and service expansions which are subject to environmental review under CEQA. The proposed General Plan Update does not include any provisions requiring the oversizing of infrastructure facilities to serve

growth not anticipated in the proposed General Plan Update. Therefore, significant growth effects resulting from infrastructure improvements as a result of implementing the updated General Plan are not anticipated.

ENVIRONMENTAL EFFECTS OF GROWTH

As described above, the intent of the proposed General Plan Update is to accommodate anticipated growth through compact, walkable, infill, and mixed-use development, as well as to focus redevelopment along transit corridors and at key locations in the community. The proposed General Plan Update policy provisions and its Land Use Diagram would provide for this anticipated growth, would minimize outward expansion of the city's boundaries, and would retain the current Butte County Greenline along the western boundary of the city. Thus, growth accommodated under the proposed General Plan Update would be confined to the immediate Chico area and would avoid growth effects of sprawl development patterns or induced growth on parcels adjacent to the city. The environmental effects of build-out of the General Plan Update are addressed in Sections 4.1 through 4.14 of this Draft EIR, and the project's cumulative impacts are addressed in Section 5.0.

7.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL EFFECTS

CEQA Guidelines Sections 21100(b)(2) and 21100.1(a) require that EIRs prepared for the adoption of a plan, policy, or ordinance of a public agency must include a discussion of significant irreversible environmental changes that would result from project implementation. In addition, CEQA Guidelines Section 15126.2(c) describes irreversible environmental changes in the following manner:

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 highway 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. Irrecoverable commitments of resources should be evaluated to assure that such current consumption is justified.

Implementation of the proposed General Plan Update could result in the conversion of undeveloped and/or underutilized residentially zoned properties to residential, commercial, office, public, and recreational uses. Subsequent development under the General Plan Update would constitute a long-term commitment to these uses. It is unlikely that circumstances would arise that would justify the return of those sites to their original condition.

Development of the city would irretrievably commit building materials and energy to the construction and maintenance of buildings and infrastructure. Renewable, nonrenewable, and limited resources that would likely be consumed as part of the development of the proposed project would include, but are not limited to, oil, gasoline, lumber, sand and gravel, asphalt, water, steel, and similar materials. In addition, development of the project would result in the increased demand on public services and utilities (see Section 4.12, Public Services and Utilities, and Section 4.14, Energy and Climate Change).

7.3 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL EFFECTS

CEQA Guidelines Section 15126.2(b) requires an EIR to discuss unavoidable significant environmental effects, including those that can be mitigated but not reduced to a level of

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insignificance. In addition, Section 15093(a) of the CEQA Guidelines allows the decision-making agency to determine whether the benefits of a proposed project outweigh the unavoidable adverse environmental impacts of implementing the project. The City can approve a project with unavoidable adverse impacts if it prepares a "Statement of Overriding Considerations" setting forth the specific reasons for making such a judgment.

The following impacts of the proposed General Plan Update, which have been recognized as "significant and unavoidable" in either the project or cumulative context, are specifically identified in Sections 4.1 through 4.14 and Section 5.0 of this Draft EIR. The reader is referred to the various environmental issue areas of these sections for further details and analysis of these significant and unavoidable impacts.

Loss of and Conversion of Agricultural Land

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.

Key themes of the proposed General Plan include the protection of agricultural resources and keeping urban growth limits. These themes reflect the City's desire to retain a compact urban form, and to emphasize infill and redevelopment, as well as new complete neighborhoods contiguous to existing urban areas. Much of the agricultural land currently within the SOI is surrounded by urban uses, and as a result it has been compromised and may not be considered "viable" agricultural land. The City recognizes the importance of agricultural lands and is committed to protecting this resource as supported by its continued commitment to the Greenline. The Greenline restricts development on the prime farmlands west of Chico and preserves this area for agricultural production. Preservation of the Greenline would continue to ensure the long-term ability of agricultural uses and serves as an urban growth boundary to restrict the conversion of farmland. However, the proposed General Plan Update could still displace areas currently in agricultural production and result in the conversion of a total of 1,041.73 acres of Prime Farmland and 25.9 acres of Unique Farmland to urban uses. The proposed General Plan policies and actions described above do not completely offset the loss of important farmland and no feasible mitigation measures are available to avoid this impact. Therefore this impact is considered **significant and unavoidable**.

Cumulative Impacts to Agricultural Resources

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.

As noted above, the Greenline is intended to restrict development on the prime farmlands west of Chico and preserves this area for agricultural production. The use of the Greenline would continue to ensure the long-term ability of agricultural uses to serve as an Urban Growth Boundary. However, the proposed General Plan Update could still result in the conversion of a total of 1,041.73 acres of Prime Farmland and 25.9 acres of Unique Farmland to urban uses. The proposed General Plan policies and actions do not completely offset the loss of important farmland, which is a statewide cumulative concern. Since no cumulative threshold of acceptable important farmland loss has been established by the State or Butte County, any contribution is determined cumulatively considerable in this Draft EIR. Thus, the contribution to

cumulative impacts on agricultural resources is considered to be a **cumulatively considerable and significant and unavoidable** impact.

State Highway Facilities

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.

State highway facilities projected to be impacted include the following:

- Segment of SR 99 between East 1st Avenue and SR 32.
- SR 32 (Nord Avenue) between West Sacramento Avenue (west) and West Sacramento Avenue (east)

Both of these facilities would operate unacceptably at LOS F during the PM peak hour under year 2030 conditions.

The policies and actions included in the proposed General Plan Update are intended to mitigate the City's impact to state facilities due to planned development as the result of the proposed General Plan Update. Specifically, the proposed General Plan Update includes Policy CIRC-1.3 that identifies the collection of the fair share cost of improvements necessary to address cumulative transportation impacts, including roadway, transit, pedestrian, and bicycle facilities, through the City's development impact fee program. In addition, the City of Chico and Caltrans have entered into a funding agreement for mitigating local developments' impact to state facilities. Further, Action CIRC-1.8.3 commits the City to continue to consult with BCAG and Caltrans regarding the prioritization and timely construction of programmed freeway and interchange improvements on the state highway system. However, implementation of future improvements on state facilities is uncertain because the future improvements of Caltrans facilities do not fall under the jurisdiction (or control) of the City. Given this uncertainty of the timing of improvements to these state facilities, this impact would be **significant and unavoidable**.

Cumulative Traffic Impacts on Local Roadways and State Highways

Impact 4.5.7 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.

Highway facilities projected to be impacted under cumulative conditions include the following:

- Segment of SR 99 between East 1st Avenue and SR 32.
- SR 32 (Nord Avenue) between West Sacramento Avenue (west) and West Sacramento Avenue (east)

Both of these facilities would operate unacceptably at LOS F during the PM peak hour under year 2030 conditions.

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Implementation of proposed General Plan Update policies and action items would assist in reducing its cumulative contribution to regional traffic effects. Specifically, the proposed General Plan Update includes Policy CIRC-1.3 that identifies the collection of the fair share cost of improvements necessary to address cumulative transportation impacts, including roadway, transit, pedestrian, and bicycle facilities, through the City's development impact fee program. In addition, the City of Chico and Caltrans have entered into a funding agreement for mitigating local developments' impact to state facilities. Further, Action CIRC-1.8.3 commits the City to continue to consult with BCAG and Caltrans regarding the prioritization and timely construction of programmed freeway and interchange improvements on the state highway system. However, this impact would still be considered **cumulatively considerable** and **significant and unavoidable** as the City does not have authority over improvements outside of the City's jurisdiction (e.g., facilities in Butte County and Caltrans facilities such as SR 32 and SR 99), and the City cannot ensure that these improvements would be completed. With the exception of funding sources for regional traffic improvements associated with the BCAG RTP, there are no other regional traffic mitigation programs in which the City could participate to minimize its regional traffic impact.

Violate Air Quality Standard or Contribute Substantially to an Air Quality Violation: Short-Term, Construction Emissions

Impact 4.6.2 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.

All projects in Butte County and in the City of Chico are subject to applicable BCAQMD rules and regulations in effect at the time of construction. The proposed General Plan Update contains Action OS-4.1.2 which mandates that during project and environmental review, the City shall evaluate air quality impacts and incorporate applicable mitigations to reduce impacts consistent with BCAQMD requirements. BCAQMD's CEQA Air Quality Handbook (BCAQMD, 2008), identifies a list of best available mitigation strategies tailored to the type of project being proposed. However, these actions might not fully offset air pollutant emissions resulting from construction activities. Projected growth under the General Plan Update could add a significant amount of development and supporting infrastructure in Chico. Construction of these projects could result in construction emission in excess of the BCAQMD threshold levels. Thus, this impact is considered **significant and unavoidable**.

Violate Air Quality Standard or Contribute Substantially to an Air Quality Violation: Long-Term, Operational Emissions

Impact 4.6.3 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.

The intent of the proposed General Plan Update is to accommodate anticipated growth in a compact, walkable community that relies on infill, mixed-use development, redevelopment along transit corridors and at other key locations, and new growth areas (Special Planning Areas) with a mix of residential densities and land uses. The proposed General Plan Update and its Land Use Diagram would provide for this growth and would minimize outward expansion of the City's boundaries. Thus, growth accommodated under the proposed General Plan Update would be confined to the immediate Chico area and would avoid growth effects of sprawl

development patterns (sprawl development patterns contribute to increased vehicle miles traveled and thus air pollutants emissions). Implementation of the proposed General Plan Land Use Diagram, however, could violate or substantially contribute to a violation in O₃, PM₁₀, and/or PM_{2.5} federal and state standards as shown in **Table 4.6-7** (Section 4.6). Thus, this impact is considered **significant and unavoidable**.

Result in a Cumulatively Considerable Net Increase in Nonattainment Criteria Pollutant

Impact 4.6.7 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.

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. In addition, as discussed above, all projects in Butte County and in the City of Chico are subject to applicable BCAQMD rules and regulations in effect at the time of construction. The proposed General Plan Update contains Action OS-4.1.2 which mandates that during project and environmental review, the City shall evaluate air quality impacts and incorporate applicable mitigations to reduce impacts consistent with BCAQMD requirements. BCAQMD's CEQA Air Quality Handbook (BCAQMD, 2008), identifies a list of best available mitigation strategies tailored to the type of project being proposed. However, while implementation of proposed General Plan Update policies and actions, as well as BCAQMD requirements, would assist in preventing, reducing, and minimizing the proposed General Plan Update's contribution to cumulative air quality impacts, a considerable amount of the ozone that is monitored in the SVAB results from pollutants that have been transported from the San Francisco Bay Area. Due to the lack of physical barriers and coastal winds blowing inland, air pollution generated in the metropolitan Bay Area is easily spread to the Sacramento Valley. As such, the City and other jurisdictions in the SJVAB often have little control over key factors that affect air quality conditions. Even after implementation of smart growth policies and BCAQMD requirements, the 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 O₃, PM₁₀, and/or PM_{2.5} federal and state standards. There are no feasible mitigation measures that can further offset air pollutant emissions from subsequent development and growth under the proposed General Plan Update.

Exposure to Surface Transportation Noise

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.

Implementation of the proposed General Plan Update noise policies, such as Policy N-1.3 that requires an acoustical analysis as part of environmental review for projects likely to expose noise-

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sensitive land uses to noise levels exceeding the City's standards, would reduce potential transportation noise impacts. Future development projects would be required to analyze project-related noise impacts and incorporate necessary noise reduction measures sufficient to achieve the applicable noise standards of the proposed Noise Element. However, it may not be possible to fully mitigate traffic and/or railroad noise in all areas, particularly in existing developed areas constrained due to age, placement, or other factors which limit the feasibility of mitigation such as residences fronting the right of way that limit the placement of noise barriers. It is important to note that the increases in traffic noise levels associated with build-out of the proposed General Plan Update would occur gradually over a period of approximately 20 years, or more. However, increases in transportation noise associated with the proposed General Plan Update could result in a permanent increase in ambient noise levels in the project vicinity above levels existing without the project and would result in exposure of persons to or generation of noise levels in excess of standards established in the proposed General Plan, which is considered to be a **significant and unavoidable** impact.

Exposure to Stationary Noise

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.

While many aspects of this impact can be mitigated to levels that are less than significant, some stationary noise impacts cannot be mitigated to a less than significant level due to limitations on the City to control the exact placement of substantial noise-generating uses (e.g., school facilities) in proximity to noise-sensitive land uses (e.g., residential). Accordingly, stationary source noise levels from activities on uses over which the City has limited control could result in noise levels that exceed the City's maximum allowable noise standards. Thus, this impact is considered **significant and unavoidable**. No additional feasible mitigation has been identified that would further reduce this impact.

Cumulative Transportation Noise Impacts

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.

Implementation of the proposed General Plan Update noise policies discussed under Impact 4.7.3 would reduce potential transportation noise impacts in the city. Future development projects would be required to analyze project-related noise impacts and incorporate necessary noise reduction measures sufficient to achieve applicable noise standards.

However, it is may not be possible to fully mitigate transportation noise in all areas of the city, particularly for existing development that may be constrained due to age, placement, or other factors which limit the feasibility of mitigation (residences fronting on the roadway that limits the ability to utilize noise barrier). In addition, the City does not have jurisdiction to implement noise mitigation outside of its boundaries (or may not be allowed to in Caltrans right-of-way) to address potential noise impacts to the surrounding, nearby unincorporated areas of Butte County. It is important to note that the increases in traffic noise levels associated with build-out of the proposed General Plan Update would occur gradually over a period of 20 years, or more. Nonetheless, the proposed General Plan Update's contribution to cumulative traffic noise would be **cumulatively considerable** and a **significant and unavoidable** impact.

Cumulative Biological Resource Impacts

Impact 4.10.4 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.

Implementation of the proposed General Plan Update policies and actions described under Impacts 4.10.1 through 4.10.3 in Section 4.10, Biological Resources, would reduce the proposed General Plan Update's contribution to cumulative biological resource impacts. However, the extent of loss of sensitive and/or critical habitats that the proposed General Plan Update would contribute to the regional loss of these resources is considered considerable. It is anticipated that the eventual implementation of the proposed Butte County Habitat Conservation Plan would address and mitigate regional biological resource impacts. However, this plan has yet to be adopted. Thus, this impact is considered **cumulatively considerable** and **significant and unavoidable**.

Substantially Degrade the Existing Visual Character, Including the Scenic Quality of the Foothills

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.

While the city's proposed and existing policy and regulatory framework as described under Impact 4.13.3 in Section 4.13 would be effective in reducing the visual prominence and aesthetic impact of new development in the foothills, any new development in these areas would be in contrast to the existing, undeveloped conditions that provide a natural visual backdrop to the city. The city's approach to protecting and maintaining the scenic qualities of the foothill areas is comprehensive and there are no additional mitigation measures available to offset this alteration of the current landscape characteristics of the Planning Area. Therefore, this impact is considered **significant and unavoidable**.

Cumulative Impacts to Scenic Vista, Scenic Resources, Existing Visual Character, and Light and Glare

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 region, impacts to scenic vistas, and increased glare/lighting.

As discussed under Impacts 4.13.1 through 4.13.4 in Section 4.13, the city's proposed and existing policy and regulatory framework (Municipal Code, Design Guidelines Manual) provides a comprehensive approach to reducing the visual prominence of new development, adverse impacts to existing scenic vistas, and substantial increases in light and glare in the Planning Area. Even so, new development and redevelopment in the Planning Area would contribute to other similar impacts resulting from development in the larger Butte County region. Even with incorporation of smart growth principles and other mitigation, the proposed General Plan Update would still contribute to significant cumulative impacts associated with alteration of the visual character of the region, impacts to scenic vistas, and increased glare/lighting in the region. No additional mitigation measures are available to offset these impacts. Therefore, this impact is considered **cumulatively considerable** and **significant and unavoidable**.

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Generate Greenhouse Gas Emissions that May Have a Significant Impact on the Environment or Conflict with Applicable Adopted Reduction Measures

Impact 4.14.2 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.

Implementation of relevant policies and actions from the proposed General Plan Update and associated adoption and implementation of the upcoming Climate Action Plan (CAP) is anticipated to mitigate greenhouse gas (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 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**.

REFERENCES

Bay Area Economics (BAE). 2008. *Draft City of Chico General Plan Update: Market Opportunities and Land Absorption Projections.*