

Town of Paradise Housing and Safety Elements INITIAL STUDY

**Town of Paradise
Community Development Department
Building Resiliency Center
6295 Skyway
Paradise, CA 95969**

April 2022

**URBAN
PLANNING
PARTNERS
INC.**

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I. PROJECT DESCRIPTION

The following is an Initial Study and Environmental Checklist for the proposed Paradise Housing Element and Safety Element Updates (the Project).

1. **Project Title:** Housing and Safety Element Updates
2. **Lead Agency Name and Address:**
Town of Paradise
Community Development Department
6295 Skyway
Paradise, CA 95969
3. **Contact Person and Phone Number:**
Susan Hartman, Community Development Director
530-872-6291 (ext. 417)
shartman@townofparadise.com
4. **Project Sponsor's Name and Address:**
Town of Paradise
6295 Skyway
Paradise, CA 95969
5. **General Plan Land Use Designation:** N/A
6. **Zoning:** N/A
7. **Project Location:** Town-wide
8. **Surrounding Land Uses and Setting:**

The environmental setting consists of the areas located within the Town of Paradise, which is located in north central Butte County. Paradise is located at the juncture of the western slopes of the Cascade and Sierra Nevada systems. The area is defined by steep canyons - to the east by the West Branch of the Feather River drainage, and to the northwest by the Butte Creek-Little Butte Creek drainage. The Town of Paradise is accessible via Skyway Road, Clark Road, Neal Road, and Pentz Road from the south, while Clark Road transitions into Highway 191 through town. Old Skyway Road is the main entrance to town from the north.

9. Description of Project:

The 2022-2030 Housing Element identifies the policies and implementation measures that the Town will implement to ensure that housing in Paradise is affordable, safe, and decent. The Housing Element addresses housing needs by encouraging the provision of an adequate quantity of sites planned for multi-family housing, preservation of existing housing, rebuilding housing lost in the 2018 Camp Fire, and increasing the safety and resiliency of housing in the town. In conjunction with the 2022-2030 Housing Element update, the Safety Element is being updated to also address wildfire risk reduction and to identify and mitigate other natural or man-made hazards.

These Housing and Safety Element updates (the Project) facilitate the rebuilding of the town since the 2018 Camp Fire at the densities that were previously developed and/or the densities allowed under the current General Plan and Zoning Code. The Project also looks at increased residential densities in the downtown core where a sewer system is currently in the planning phase (See Figure 1). As part of the implementation of the Housing Element, a Sewer Service Overlay Zone would be developed to enable mixed-use and multi-family development at higher densities on parcels within the Sewer Service Area. Figure 2 shows sites identified in the Housing Element update to accommodate the Town's Regional Housing Needs Allocation (RHNA). The Town's assigned RHNA is shown in Table 1. The vast majority of the parcels identified in the Housing Element were previously developed with housing that was destroyed in the Camp Fire and 95 percent of the Town's RHNA was allocated to rebuild units lost in the fire. Although the Housing Element demonstrates the land availability to accommodate the entirety of the Town's RHNA, the quantified objectives for the Housing Element are shown in Table 2. These quantified objectives represent the number of units likely to be constructed, rehabilitated, or conserved/preserved by income level during the planning period. The quantified objectives do not represent a ceiling on development, but rather set a target goal for the jurisdiction to achieve, based on needs, resources, and constraints. The Town's quantified objectives are for the construction of 3,020 units and rehabilitation of 55 units.

No physical development changes are proposed as part of the Project. Instead, the Project establishes housing and safety-related goals, policies, and programs and the Housing Element identifies suitable land for development to achieve its RHNA. The general goals of the Safety Element are to minimize risk and vulnerability of the community to hazards, increase the community's ability to be prepared for and respond to disaster events, reduce fire severity and intensity in and around Paradise, and increase resiliency in the face of climate change. The general goals of the Housing Element are to encourage and facilitate the production of all housing types; improve, rebuild, and preserve safe and decent housing; and accommodate housing designed for persons with special housing needs.

TABLE 1 FINAL TOWN OF PARADISE RHNA BY INCOME TIER

| Income Group | Town of Paradise Units | Town of Paradise Percent | Butte County Units | Town of Paradise Percent of County RHNA |
|---|-------------------------------|---------------------------------|---------------------------|--|
| Very Low Income (<50 percent of AMI) | 383 | 5% | 2,081 | 18% |
| Low Income (50 percent-80 percent of AMI) | 374 | 5% | 1,290 | 29% |
| Moderate Income (80 percent-120 percent of AMI) | 1,319 | 18% | 3,202 | 41% |
| Above Moderate Income (>120 percent of AMI) | 5,103 | 71% | 8,933 | 57% |
| Total | 7,179 | 100% | 15,506 | 46% |

Source: Butte County Association of Governments Regional Housing Needs Plan, December 2020.

TABLE 2 TOWN OF PARADISE QUANTIFIED OBJECTIVES 2022-2030

| Income Levels | Construction | Rehabilitation | Preservation |
|--|---------------------|-----------------------|---------------------|
| Extremely and Very Low Income (<50 percent of AMI) | 133 | 30 | - |
| Low Income (50 percent-80 percent of AMI) | 483 | 25 | - |
| Moderate Income (80 percent-120 percent of AMI) | 402 | 0 | - |
| Above Moderate Income (>120 percent of AMI) | 2,002 | 0 | - |
| Total | 3,020 | 55 | - |

No at-risk units were identified, and therefore no preservation is required at this time.
 Source: Town of Paradise, 2021.

The Town of Paradise General Plan was adopted by the Town Council in 1994 and amended through 2010. The General Plan was designed to serve as a long-term guide for orderly growth and development in Paradise. The General Plan also forms the foundation for zoning, subdivision regulation, and other planning decisions. The General Plan includes seven elements, including the Housing Element and Safety Element. The Housing Element has been periodically updated through the years, with the most recent 2014-2022 Housing Element adopted in June 2014. The 1994 General Plan including the 2014-2022 Housing Element serve as the Town’s current, comprehensive and long-term plan for the future physical and orderly development of the community, consistent with the State’s regulatory requirements. The

2022-2030 Housing Element is a continuance of this update process and, if adopted by the Town, would require an amendment to the General Plan for its inclusion. The Safety Element has not been updated since the adoption of the General Plan, but other planning efforts, including the Butte County Local Hazard Mitigation Plan and Butte County Community Wildfire Protection Plan, have continued to analyze and mitigate safety hazards. State legislation since the 2014-2022 Housing Element now requires the Safety Element be updated whenever the Housing Element is updated.

The proposed Housing and Safety Elements include programs which would require amendments to the Town's Municipal Code. The way in which these changes impact the physical environment in the town is the basis of the analysis provided in this Initial Study.

10. Required Approvals:

The Housing and Safety Elements require adoption by the Town of Paradise along with General Plan Amendments to incorporate the updated Elements into the General Plan.

11. Other Public Agencies Whose Approval is Required:

The Town of Paradise is the lead agency with responsibility for approving the Project. There are no other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement) for the proposed Housing and Safety Elements.

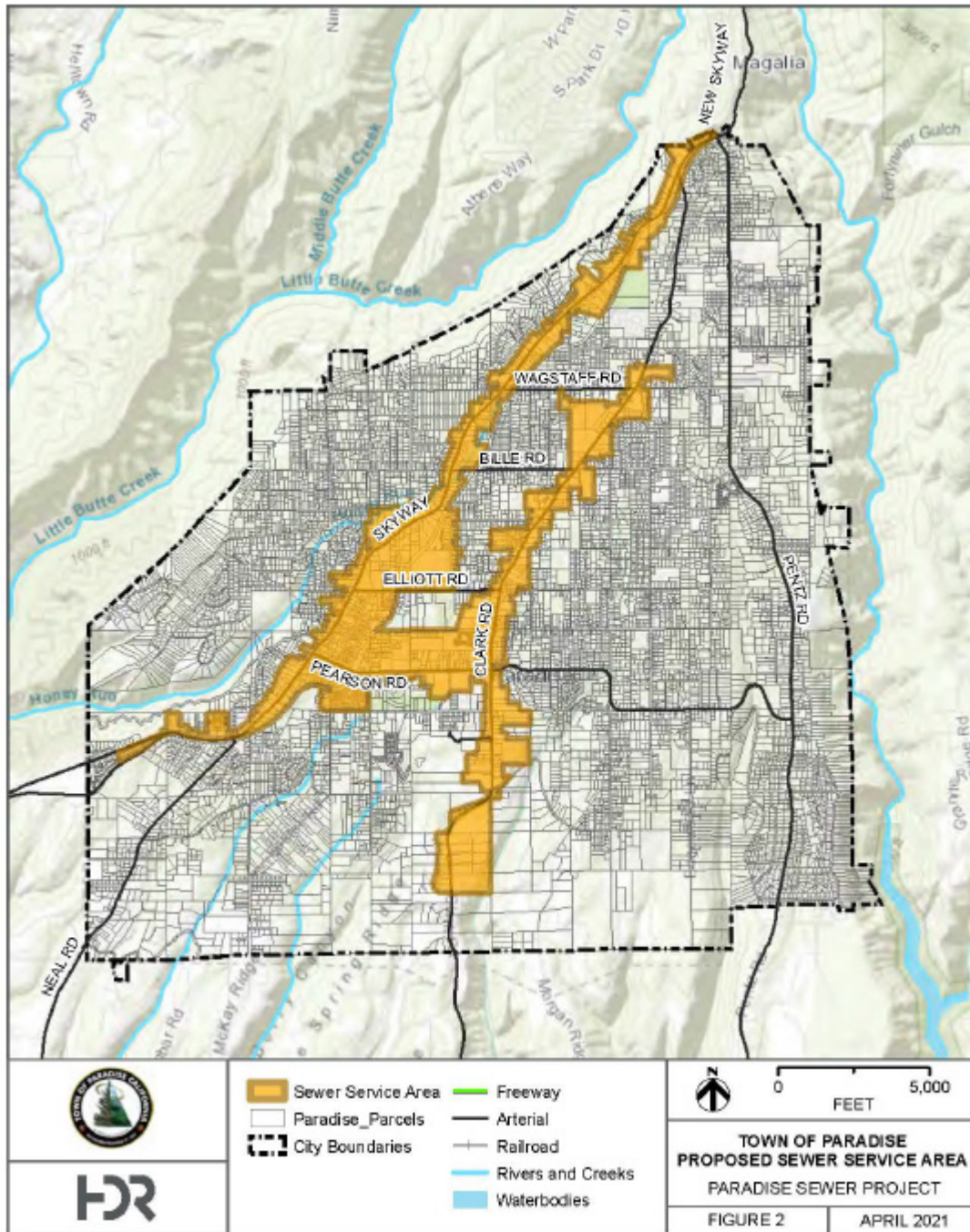
The California Department of Housing and Community Development (HCD) reviews the proposed Housing Element and determines whether it complies with State law. While HCD approval is not required for the Town's adoption of the Housing Element, certification from HCD indicates that a housing element is adequate. Similarly, the California Board of Forestry and Fire Protection reviews the Safety Element for land use considerations in high fire risk areas.

12. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

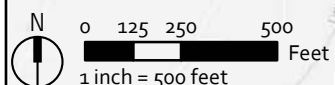
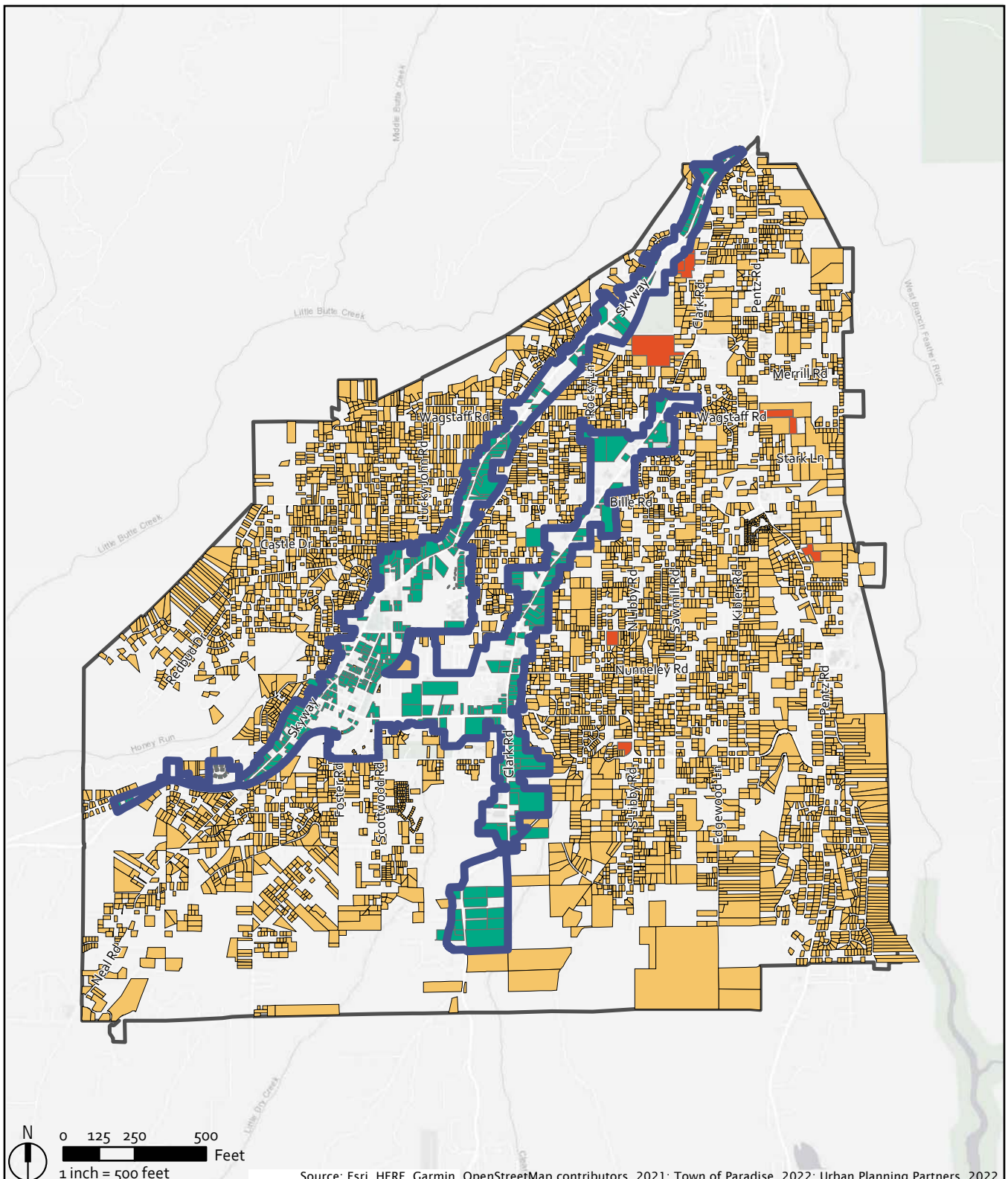
The Town of Paradise started the AB 52 and SB 18 90-day Tribal Consultation opportunity period, according to Government Code Section 65352.3, by sending out certified written notices on November 2, 2021 inviting the appropriate tribes to consult on the project. The tribes that were notified are: United Auburn Indian Community of the Auburn Rancheria, Mooretown Rancheria, Mechoopda Indian Tribe, Greenville Rancheria, Berry Creek Rancheria, Enterprise Rancheria, Washoe Tribe of Nevada and California, and Konkow Valley Band of Maidu (Tribes). Two tribes responded: the United Auburn Indian Community of the Auburn Rancheria and the Berry Creek Rancheria. The United Auburn Indian Community of the Auburn Rancheria confirmed that the Project site is outside of its geographic area of traditional and cultural affiliations. The Berry Creek Rancheria tribe requested a consultation related to the sewer system and the corresponding Sewer Service Overlay Zone, and consultation occurred

between the tribe and the Town's engineering department (the lead agency for the Town's sewer project). The sewer project is a separate effort for this Project and currently undergoing its own environmental review. Upon further conversations with the tribe, the Berry Creek Rancheria shared that they did not have concerns with the Project, which is related to making land available for rebuilding and new construction of housing. Consistent with Government Code 21080.3.2, tribal consultation is considered concluded given the tribe's input that no significant effect exists.

Figure 1 Project Location



Source: Town of Paradise and HDR, 2021



Source: Esri, HERE, Garmin, OpenStreetMap contributors, 2021; Town of Paradise, 2022; Urban Planning Partners, 2022.





- | | | | |
|---|--------------------------|---|---|
|  | Town of Paradise |  | Single-Family Rebuilds/New Construction |
|  | Proposed Sewer Service |  | Multi-Family Development Outside Sewer Area |
|  | Sewer Service Area Sites | | |

Figure 2
Adequate Residential Sites

Town of Paradise Housing Element 2022-2030

II. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by the Project, involving at least one impact that is a Potentially Significant Impact, as indicated by the checklist on the following pages.

- | | |
|---|---|
| <input type="checkbox"/> Aesthetics Resources | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Air Quality | <input type="checkbox"/> Parks & Recreation |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Population & Housing |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Energy | <input type="checkbox"/> Transportation & Traffic |
| <input type="checkbox"/> Geology & Soils | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Utilities & Service Systems |
| <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Wildfire |
| <input type="checkbox"/> Hydrology & Water Quality | <input type="checkbox"/> Mandatory Findings of Significance |
| <input type="checkbox"/> Land Use & Planning | |

Determination:

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



4/15/2022

Signature

Date

Susan Hartman

Environmental Review Officer

III. ENVIRONMENTAL CHECKLIST

1. Aesthetics Resources

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|-------------------------------------|--------------------------|
| Would the project: | | | | |
| a. Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| a) <i>Have a substantial adverse effect on a scenic vista? 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 a non-agricultural use?</i> | | | | |

Less Than Significant. Scenic resources in the vicinity of Paradise include the Sutter Buttes, Coastal Range, Sierra Nevada, and scenic water resources. The Town’s General Plan establishes four “gateway areas” where views of unique environmental settings are to be preserved and enhanced. These gateway areas are described below.

- Lower Skyway Gateway. An area approximately 2,000 feet in circumference along lower Skyway at the Town limits and in the western Sphere of Influence boundary. Honey Run Road goes through this gateway.
- Neal Road Gateway. An area approximately 2,000 feet in circumference right near the Town limits and in the southwestern Sphere of Influence boundary.

- Lower Clark Gateway. An area of approximately 2,000 square feet in circumference along lower Clark Road (Highway 191) outside of Town limits and in the southern Sphere of Influence boundary.
- Pentz Road Gateway. An area of approximately 2,000 square feet in circumference along lower Pentz Road outside of Town limits and in the southern Sphere of Influence boundary.

In addition to the gateway areas, scenic corridors link and branch off the gateways, extending into and through town. Within Town limits, southern portions of Skyway and Neal Road are identified as scenic corridors and the entirety of Pentz Road within town is identified as a scenic corridor.

The Project does not include any specific designs or proposals, nor does it grant any entitlements for development. Implementation of the Housing Element Update would potentially lead to an increase in residential units within Paradise; however, the Town has adequate housing sites to accommodate its RHNA over the current housing cycle without annexing natural lands. Development along Pentz Road would remain low-density and the portions of the town envisioned for medium-density development in the Sewer Service Area (SSA) are in the downtown core with substantial distance from the scenic gateways. In addition, future development would be subject to objective standards in the Zoning Code and General Plan, including Section 17.06.820 *Scenic highway corridors* that maintain key viewsheds and prohibit incompatible uses on scenic corridors. In addition, most of the housing sites identified to accommodate the Town's RHNA were previously developed with housing that was destroyed in the fire.

For these reasons, the Project's impacts on scenic vistas would be less than significant.

- b) *Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

Less Than Significant. According to the California Department of Transportation, there are no eligible or designated State scenic highways in Paradise. The nearest eligible highway is Route 70 between Route 149 near Wicks and Route 89 near Blairsden. Route 70 is east of Paradise, ranging from approximately 2.5 miles away in the southeast edge of town to 6.3 miles in the northeast edge of town. Paradise is not visible from the Highway given the topography.

While the Housing Element Update encourages the provision of a range of housing types and affordability levels, it does not include any specific designs or proposals, nor does it grant any entitlements for development that would degrade the existing visual character of the Town. Future residential development projects would be required to comply with the General Plan policies related to visual resources (e.g., OCEP-3, OCEP-5) and Municipal Code requirements associated with planning and development regulations.

As mentioned above, the Project envisions development be more clustered in the downtown core than the pre-Camp Fire (pre-Fire) conditions. Densifying areas in the middle of town that

are better served by evacuation routes and utilities is compatible with maintaining the scenic resources surrounding the Town limits.

For these reasons, the Project's impacts on scenic resources would be less than significant.

- c) *In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

Less Than Significant. While the Project encourages the provision of a range of housing types and affordability levels, it does not include any specific designs or proposals, nor does it grant any entitlements for development that would degrade the existing visual character or quality of public views within the Town. Future residential development projects would be required to comply with the General Plan policies related to visual resources (e.g., OCEP-3, OCEP-5) and Municipal Code requirements, including Section 17.06.820 *Scenic highway corridors*, associated with maintain the visual quality of public views of the town's scenic surroundings.

As previously mentioned, the Project includes policies and programs to facilitate medium-density, multi-family development in the SSA. The SSA is in the downtown core and a substantial distance from the scenic gateways identified in the General Plan.

For these reasons, the Project would not degrade the visual character of the town and the potential impacts would be less than significant.

- d) *Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

Less Than Significant. The Project does not include any specific development designs or proposals, nor does it grant any entitlements for development that would increase daytime glare or nighttime illumination in the town. Future residential development projects in Paradise would be required to be designed and constructed in accordance with Town regulations, including Municipal Code Sections 17.06.810 *Lighting fixtures*, which requires lighting fixture designs and placement to reflect away from nearby residences within 200 feet and to minimize glare and illumination onto adjoining or nearby properties.

For these reasons, the project would not create new sources of light or glare that could adversely affect daytime or nighttime views in the area.

2. Agricultural and Forestry Resources

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|-------------------------------------|
| Would the project: | | | | |
| a. 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 a non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Conflict with existing zoning for agricultural use, or a Williamson Act contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Result in the loss of forest land or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

a) *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 a non-agricultural use?*

No Impact. The Project would not affect prime, unique, or farmland of statewide importance. According to the California Department of Conservation, no potentially important farmland has been mapped in Paradise.

b) *Conflict with existing zoning for agricultural use, or a Williamson Act contract?*

Less Than Significant. Paradise has no Williamson Act Contracts according to the California Department of Conservation. Paradise has agricultural zones in various areas of the Town, consistent with the open-space agricultural land use designation of the Paradise General Plan. The project would not conflict with the existing zoning for agricultural use and therefore would have a less than significant impact.

- c) *Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?*

No Impact. The Project would not affect timberland. The sites identified to satisfy the RHNA do not include timberland, according to the Paradise General Plan Land Use Element, Figure 2-1. There would be no impact from the Project.

- d) *Result in the loss of forest land or conversion of forest land to non-forest use?*

No Impact. The Project would not affect forestland. The Town does not contain any lands for forest use and the Project would only affect development within the Town limits. There would be no impact to or conversion of forest land from the Project.

- e) *Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?*

No Impact. Implementation of the Project would not result in the conversion of Farmland or forest land to non-agricultural or non-forest use, respectively. The Project facilitates vegetation management and future residential development, but only within Town limits. The Town has adequate residential capacity inside the Town limits to accommodate its RHNA and implementation of the Project would not affect the agricultural or forest lands surrounding Town. The Project would have no impact.

3. Air Quality

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|-------------------------------------|
| Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project: | | | | |
| a. Conflict with or obstruct implementation of the applicable air quality plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Expose sensitive receptors to substantial pollutant concentrations? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Result in other emissions (such as those leading to odors adversely affecting a substantial number of people)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Paradise is located in a region identified as the Sacramento Valley Air Basin (SVAB), which principally includes all of Sacramento, Yolo, Yuba, Sutter, Colusa, Glenn, Butte, Tehama, and Shasta counties and parts of Solano and Placer counties. This larger air basin is divided into local air districts, which are charged with the responsibility of implementing air quality programs. The project site is located in Butte County, which is under the jurisdiction of the Butte County Air Quality Management District (BCAQMD). The BCAQMD adopts and enforces controls on stationary sources of air pollutants through its permit and inspection programs and regulates agricultural and nonagricultural burning. Other district responsibilities include monitoring air quality, preparing air quality plans, and responding to citizen air quality complaints. In Butte County, the two pollutants of most concern are fine particulate matter (PM2.5) and Ozone (O3). PM2.5 is a common wintertime pollutant and Ozone is a common summertime pollutant.

a) *Conflict with or obstruct implementation of the applicable air quality plan?*

Less Than Significant. Although Butte County is in non-attainment for 8-Hour Ozone, changes based on the Housing Element and Safety Element Updates would not obstruct the implementation of the air quality plan addressing this. The Northern Sacramento Valley Planning Area 2018 Triennial Air Quality Attainment Plan (2018 Air Quality Attainment Plan) proposes strategies to attain California Ambient Air Quality Standards (CAAQS) for ozone. Ozone can be caused by stationary source emissions (e.g., internal combustion engines, boilers), mobile sources (e.g., cars, trucks, trains) or area sources (e.g., consumer products,

wildfires). In addition, the Northern Sacramento Valley Planning Area (NSVPA) can experience ozone from the Broader Sacramento Area; emissions originally created in the Broader Sacramento Area can be blown north into the NSVPA and affect the NSVPA pollution levels.

The 2018 Air Quality Attainment Plan utilized existing and projected data for population, industry, and vehicle-related emissions growth. The population projections were based on data from the California Department of Finance (DOF) Demographic Research Unit. The Butte County Association of Governments 6th Cycle Regional Housing Needs Plan is likewise based on DOF population projections (in addition to data from the relevant Regional Transportation Plan). Therefore, the housing units the Project is planning for are part of the population growth planned for in the 2018 Air Quality Attainment Plan.

The Project includes policies and programs to facilitate housing construction. However, any future construction in the Town must follow the regulations set forth by the Butte County Air Quality Management District and the Town of Paradise. For example, future residential development projects would comply with General Plan policies related to improving air quality (e.g., Policies CP-11, CP-13, CP-15, CP-17, CP-20, CP-21, and CP-23).

Environmental impacts of subsequent development projects would also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Therefore, implementation of the 2014-2022 Housing Element would have a less-than-significant impact associated with obstructing implementation of the regional air quality attainment plan.

b) *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?*

Less Than Significant. As previously mentioned, Paradise (and all of Butte County) does not meet national standards for ozone. Future development of housing units facilitated by the implementation of Project could result in an increase in criteria pollutants during both construction and operational activities and could also contribute to the existing nonattainment status of the NSVPA for ozone. Construction activities such as excavation and grading operations, construction vehicle traffic, and wind blowing over exposed earth could generate exhaust emissions and fugitive particulate matter emissions that would affect local air quality. This is variable depending on the weather, soil conditions, and the amount of activity taking place, as well as the nature of dust control efforts. Likewise, operational air quality impacts are dependent on the density and size of specific residential land uses.

The Project does not include any specific development designs or development proposals, nor does it grant any entitlements for development. All future development would be required to be in accordance with local regulations. Environmental impacts of subsequent development projects would also be considered, pursuant to CEQA, on a case-by-case basis following submittal of a specific development proposal. Furthermore, future residential development projects would be required to comply with General Plan policies related to air quality (e.g.,

Policies CI-11, CI-13, and CI-16). Finally, policies and programs in the Safety Element would mitigate hazards related to poor air quality from wildfire smoke. Therefore, Project implementation would have a less than significant impact associated with contributing substantially to an existing or projected air quality violation and increasing criteria pollutants during both construction and operational activities.

c) *Expose sensitive receptors to substantial pollutant concentrations?*

No Impact. The Project is a policy document. It does not include any specific development designs or development proposals, nor does it grant any entitlements for development. Housing units facilitated by the Project would be considered sensitive receptors that could be exposed to pollutant concentrations. However, future residential development would be required to comply with General Plan policies and environmental health regulations related to pollutants, during both construction and operational activities, including national ambient air quality standards and BCAQMD thresholds. There would be no impact from the Project.

d) *Result in other emissions (such as those leading to odors adversely affecting a substantial number of people)?*

No Impact. Residential developments are not considered to be an emission source that would result in objectionable odors. The Project does not include any specific development designs or development proposals, nor does it grant any entitlements for development. All future development would be required to be in accordance with local regulations. The project would have no impact.

4. Biological Resources

| Would the project: | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|-------------------------------------|-------------------------------------|
| a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) Through direct removal, filling, hydrological interruption, or other means? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional, or State habitat conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| a) <i>Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?</i> | | | | |

Less Than Significant. The Project would affect lands in the Town of Paradise. According to the US Fish and Wildlife Service, the following species are threatened, endangered, or candidate species that may be present in Butte County: yellow-billed cuckoo, giant garter snake, California red-legged frog, California tiger salamander, Sierra Nevada yellow-legged frog, delta smelt,

valley elderberry longhorn beetle, fairy shrimp, vernal pool fair shrimp and vernal pool tadpole shrimp. According to the California Department of Fish and Wildlife, the following species of special concern or threatened species occur vicinity of Paradise (i.e., one of the quadrangles that Town touches): foothill yellow-legged frog, bald eagle, California spotted owl, fisher, western pond turtle, golden eagle, California black rail, western spadefoot, greater sandhill crane, long-eared owl, burrowing owl, coast horned lizard, and tricolored blackbird. State, federal, and local policies exist to protect threatened and endangered species, including the federal Endangered Species Act, California Endangered Species Act, Migratory Bird Act, and Native Plant Protection Act.

The proposed Housing and Safety Element Updates are policy level documents. While the Project encourages the provision of a range of housing types and affordability levels, it does not include any specific development designs or development proposals, nor does it grant any entitlements for development. All future residential development occurring within the Town would be required to be in accordance with local regulations addressing special status species and would be subject to CEQA review once a specific development proposal is submitted.

Furthermore, wildfire prevention and resiliency policies in the Safety Element could improve the health of the ecosystem by facilitating the use of native plant species, drought-tolerant and fire-resistant landscaping, and healthy forest best management practices. The Project also seeks to facilitate the use of key parcels as open space Wildfire Risk Reduction Buffers and to concentrate more housing in the SSA near the center of town. Concentrating future development on sites located within or surrounded by already developed communities/neighborhoods is consistent with the existing General Plan policies (e.g., OCEP-15, OCEP-17, OCEP-27) to preserve important natural lands and habitat areas.

For these reasons, the Project would have a less-than-significant impact on candidate, sensitive, or special status species.

b) *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

Less Than Significant. There are several freshwater ponds and creeks within the Town limits. As discussed under a) above, the proposed Project is a policy-level document and it does not include any site-specific designs or development proposals, nor does it grant any entitlements for development. Future residential development resulting from Project implementation may result in adverse impacts to sensitive natural communities such as riparian habitat. However, the future development would be subject to the environmental reporting requirements of CEQA and to Paradise General Plan policies that protect natural communities (e.g., OCEP-24, OCEP-26, OCEP-27). In addition, the Project includes policies and programs to facilitate infill housing development and to create and preserve open space for Wildfire Risk Reduction Buffers. For these reasons, the Project would have a less-than-significant impact on riparian habitat and sensitive natural communities.

- c) *Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) Through direct removal, filling, hydrological interruption, or other means?*

Less Than Significant. As discussed under a) and b) above, the proposed Project is a policy-level document and it does not include any site-specific designs or development proposals, nor does it grant any entitlements/or development. The potential for future development influenced by the Project to have an adverse effect on wetlands cannot be determined, as no specific details regarding future land use development are provided. Although additional impacts are not expected to result from the implementation of future individual residential projects as they relate to the sites identified to satisfy the RHNA or by the Project's proposed regulatory changes, review would be required of these future proposals and would identify and if necessary, require avoidance or provide mitigation for any impacts to wetlands in the Town. The adoption of the Project would have a less than significant impact.

- d) *Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

Less Than Significant. As discussed above, the Project is a policy-level document and it does not include any site-specific designs or development proposals, nor does it grant any entitlements for development. The potential for future development influenced by the proposed changes to the Housing Element to interfere substantially with the movement of native resident or migratory fish or wildlife species or migratory wildlife corridors or the uses of wildlife nursery sites cannot be determined, as nonspecific details regarding future land use development are provided. Although additional impacts are not expected to result from the implementation of future individual residential projects as they relate to the sites identified to satisfy the RHNA or by the Project's proposed regulatory changes, review would be required of these future proposals and would identify, and if necessary, require avoidance or provide mitigation for any impacts to native wildlife corridors and nursery sites. The adoption of the Project would have a less than significant impact.

- e) *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

Less Than Significant. The Project does not include any specific development proposals, nor does it grant any entitlements for development that would affect biological resources. The Project does include programs and policies to increase community awareness of best practices for vegetation management, facilitate effective fuels management programs, and increase the use of fire-resistant plantings. Such policies would enhance, not contradict, existing Town policies related to the preservation of healthy trees and biological resources, including Municipal Code Sections 8.12 *Felling, removal, destruction, damaging and replacement of trees* and 8.58 *Defensible space and hazardous fuel management*. Policies proposed by the Project

are consistent with the Municipal Code and General Plan and future development under the Project would be subject to local regulations, including the Town's tree replacement programs codified in Section 8.12.120 of the Municipal Code.

Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources and potential impacts would be less than significant.

f) *Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional, or State habitat conservation plan?*

No Impact. There are currently no adopted or proposed habitat conservation plans (HCPs), natural community conservation plans (NCCPs), or other approved local, regional, or State habitat conservation plans that affect the Town. The Butte Regional Conservation Plan (BRCP) is a joint HCP/NCCP currently under development, but it is for the cities of Chico, Oroville, Gridley, and Biggs, as well as lowland Butte County; Paradise is not within the proposed conservation area of this plan. Because the HCP/NCCP is not yet final and the town is not within the proposed conservation area, there would be no potential for conflict with the Project.

Moreover, the Project does not include any specific development proposals, nor does it grant any entitlements for development that would affect biological resources. There would be no impacts from the Project.

5. Cultural Resources

| Would the project: | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Disturb any human remains, including those interred outside of formal cemeteries? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a-c) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5? Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5? Disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant. Paradise lies within territory formerly inhabited by the Northwestern Maidu or Konkow peoples. This group of native peoples divided themselves into territorial groups known as "tribelets" or "village communities," which consisted of multiple politically confederated villages. Each tribelet was sovereign in matters of land ownership, reaction to trespass, and ceremonies. Major villages were located atop the crests of ridges high above the rivers.¹

Future residential development under the Project could conflict with existing known cultural and historical resources. There is a band of land that runs across southern Paradise, roughly following Honey Run, Bushman, and Pearson Roads, that is known for archaeological sensitivity (see Figure 2-3 Land Use Constraints Diagram of the General Plan). In addition to "known" resource areas, there is the potential that there are undiscovered paleontological and archeological resources that would be encountered and potentially impacted by future construction activities. These resources could include human remains located outside of cemeteries.

While the Project encourages the provision of a range of housing types and affordability levels, it does not include any specific development designs or proposals, nor does it grant any entitlements for development that would adversely affect archaeological, paleontological, or historic resources. All future residential development occurring within the Town would be required to comply with local regulations, including General Plan policy OCEP-36, which requires development in the known archeological sensitivity area to undertake an archaeological survey and for projects outside the sensitivity area to consult the California

¹ Town of Paradise, 1994. Paradise General Plan Environmental Setting Document.

Archaeological Inventory, Northeast Information Center, and California State University, Chico to determine whether a survey is recommended. The Town also has policies to mitigate potential discovery of cultural resources, including ceasing work in the event of artifact discoveries (OCEI-20). For these reasons, the Project's impacts on cultural resources would be less than significant.

6. Energy

| Would the project: | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|-------------------------------------|--------------------------|
| a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a) *Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

Less Than Significant. Pacific Gas & Electric Company (PG&E) provides energy to Paradise. According to the California Energy Commission, the total electricity usage in PG&E’s service area in 2020 was approximately 78,520 million kilowatt-hours (kWh).² New housing in Paradise facilitated by the Project would lead to increased energy consumption due to both construction and operation of new residential units. Construction-related energy usage would be temporary and have a negligible contribution to the Project’s overall energy consumption. Construction contractors would have a financial disincentive to waste fuel used by construction equipment (i.e., excess fuel usage reduces profits) and therefore, it is generally assumed that energy used during construction would be conserved to the maximum extent feasible. Furthermore, regulations enforced by the California Air Resources Board (Title 13, Section 2485 of California Code of Regulations) limit the idling time of diesel construction equipment to five minutes.

In almost all cases, the sites identified for future residential development to accommodate the RHNA were previously developed with housing and almost the entirety (95 percent) of the Town’s RHNA was assigned to rebuild units lost in the Camp Fire. The potential increase in electricity consumption over baseline conditions due to operation of residential units would be comparable to the energy usage that was accommodated pre-Fire and represents a minimal increase in electricity consumption in context of the energy availability and consumption within PG&E’s service area. The Project also includes policies and programs to reduce the energy consumption of future residential households by increasing awareness of building methods and materials that increase resiliency (SP-53, SI-23) and providing assistance for low-income households to perform energy improvements (SI-2, HI-20). Future development would also comply with applicable provisions of the California Building Code related to energy efficiency.

² CEC, 2021. “Electricity Consumption by Entity.” Available at <http://ecdms.energy.ca.gov/elecbyutil.aspx>. Accessed November 16, 2021.

The Project includes policies and programs to encourage smaller multi-family units in infill locations well served by infrastructure (and disincentivizes density where there is poor access to evacuation routes and where wildfire risk is highest, such as parcels identified as Wildfire Risk Reduction Parcels). The type of mixed-use infill development well-served by services and infrastructure that the Project encourages tends to encourage use of public transit, walking, and biking as alternatives to private vehicles, as well as trip internalization, thereby reducing unnecessary consumption of vehicle fuels.³

For the reasons discussed above, the Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. The inclusion of policies to reduce energy consumption and facilitate development that is more energy efficient could have a positive impact on energy consumption and any impacts would be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant. The Project sites would not result in conflicts or obstruct plans for renewable energy. In fact, the Project includes policies and programs such as rebates and education around installing renewable energy sources and more energy-efficient building materials. It also seeks to incentivize multi-family development near services and create a more walkable pattern of development. Such policies are consistent with the Paradise General Plan (e.g., OCEG-10, OCEP-39), which addresses energy efficiency in the Open Space/Conservation/Energy Element. Impacts from the project would be less than significant.

³ Victoria Transport Policy Institute.2020. Land Use Impacts On Transport: *How Land Use Factors Affect Travel Behavior*. June 5.

7. Geology and Soils

| Would the project: | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|-------------------------------------|
| a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: | | | | |
| i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| ii. Strong seismic ground shaking? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iii. Seismic-related ground failure, including liquefaction? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iv. Landslides? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Result in substantial soil erosion or the loss of topsoil? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

- a) *Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:*
 - i) *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42;*
 - ii) *Strong seismic ground shaking;*
 - iii) *Seismic-related ground failure, including liquefaction;*

Less Than Significant. The Project includes policies and programs designed to facilitate the construction and conservation of housing, which could increase exposure of people and structures to seismic hazards, including rupture of a fault, strong seismic shaking, and seismic-related ground failure. There are no known or inferred active faults within the town and none of the sites identified to satisfy the RHNA are located within an Alquist-Priolo zone. The only known active fault in Butte County is the Cleveland Hills fault, the site of the August 1975 Oroville earthquake. This earthquake had a Richter magnitude of 5.7. Due to the proximity of the Town to the nearby Cleveland Hills Fault, the Town can expect low to medium intensity shocks from time to time. The town is considered to be at a low risk of hazards from liquefaction.

The Safety Element also includes policies to minimize risk and vulnerability of the community to hazards and reduce damages. Furthermore, all future residential development would be required to be in compliance with local and State regulations, including the General Plan, Zoning Ordinance and the Alquist-Priolo Earthquake Fault Zoning Act. Environmental impacts of subsequent development projects would also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Applicants would also have to work with the Town of Paradise Building Department to implement the proper structural specifications. The California Building Code ensures that structures be built according to required seismic standards and designed to withstand such events. Future residential development related to the Project would be required to meet the California Building Code requirements. For these reasons, potential impacts related to seismic conditions would be less than significant.

iv) Landslides?

Less Than Significant. Landslides are most likely on hillsides where rock strata parallels surface slopes, high clay content absorbs excess water, displacement has fractured a fault zone, or the base of a slope has been removed by erosion or people. The majority of Paradise is at a low to moderate risk of landslide. The areas surrounding the town are where the topography most dramatically changes and are at greater risk to landslide. The northern edge of town and pockets in the southern and western edges are at moderate risk and the Town limits on the east abut and at times overlap an area of high potential landslide risk.

The Project includes policies and programs designed to facilitate the construction and conservation of housing, which could increase exposure of people and structures to landslides. The Project includes policies to facilitate clustering development in the SSA, which is primarily contained within the area of low landslide risk. The Safety Element also includes policies and programs to minimize risk and vulnerability of the community to hazards and reduce damages. The Town also has policies to prohibit development on steep slopes where landslide and ground failure are a greater concern; development on slopes exceeding 20 percent are required to submit erosion control plans and slope stabilization programs. Development is prohibited on slopes exceeding 30 percent. Consistency with local and State policies, including the California Building Code, would ensure future development under the Project is designed to reduce landslide risks. The Project, which is at the policy level, would have less than significant impacts related to exposing people to landslides.

b) *Result in substantial soil erosion or the loss of topsoil?*

Less Than Significant. Future construction related to the Project could result in the moving and grading of topsoil, which could lead to disturbed soils that are more likely to suffer from erosion from a variety of sources, such as wind and water. However, as discussed above, the Project is a policy-level document that does not propose any specific development and does not directly result in adverse impacts associated with substantial loss of topsoil or erosion. Any future residential developments would be subject to Building and Safety codes that address grading and the environmental analysis requirements of CEQA. In addition, any future development would be required to prepare a stormwater pollution prevention plan (SWPPP) in compliance with the Regional Water Quality Control Board's (RWQCB) General Construction Storm Water Permit. SWPPPs are required to identify best management practices to minimize soil erosion and protect existing drainage systems during construction. Compliance with the State's General Construction Storm Water Permit minimizes soil erosion and loss of topsoil associated with development. Impacts from the Project would be less than significant.

c-d) *Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?*

Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?

Less Than Significant. Expansive or shrink-swell soils are soils that swell when subjected to moisture and shrink when dry. Expansive soils typically contain clay minerals that attract and absorb water, greatly increasing the volume of the soil. This increase in volume can cause damage to foundations, structures, and roadways. Standard procedures used in the construction of concrete footings as required by the California Building Code address this potential impact of future development pursuant to the Project. Future development facilitated by the Project could be on unstable or expansive soils, but compliance with existing regulations like the California Building Code and CEQA would decrease any risks. The policies included in

the Project seek to minimize the risk of hazards through community education, land use planning, and development standards. Impacts from the Project would be less than significant.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The wastewater infrastructure in Paradise and throughout the unincorporated areas immediately adjacent to town has relied on septic and leach field systems in past years and will continue to do so during the 2022-2030 Planning Period of the Housing Element. This situation is a viable alternative for new development at lower densities, but not for development at densities of 10 units per acre or higher. Development in Paradise is constrained by the lack of a community wastewater collection and treatment system. The use of clustered wastewater treatment systems, which combine several discharges, treat the waste in one biological treatment plant to a high-quality level, and discharge to subsurface land disposal, is one alternative design that is accepted by the Town and serves as a means to allow development to move forward without the impacts that are associated with the septic leach line systems that currently serve most Paradise. This alternative can be feasible for a larger project, or a consortium of property owners, but is a constraint to small individual projects due to the relatively high cost.

The Project includes a program (HI-1) to continue planning for a sewer system and to provide education to property owners and other stakeholders as planning continues. Program HI-5 would create a zoning overlay to allowed increased densities in the SSA. The Paradise Sewer Project is undergoing its own CEQA review (an EIR began in fall 2020) and the Project under review in this CEQA document does not propose to construct, nor does it require the construction of, such a sewer system. All future housing would be required to comply with the Town's wastewater regulations, including the determination of whether a project site's soils could support a septic system or other type of wastewater disposal. As such, implementation of the Project would have no impact in this area.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant. The Project does not include any specific development designs or proposals, nor does it grant any entitlements/or development that would adversely affect paleontological or unique geological features. All future residential development occurring within the Town pursuant to the Project would be required to comply with local regulations, including General Plan program OCEI-20, which requires work to immediately stop should any artifacts be discovered during construction. Impacts from the Project would be less than significant.

8. Greenhouse Gas Emissions

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| Would the project: | | | | |
| a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions greenhouse gases? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

In 2006, the California State Legislature passed the California Global Warming Solutions Act (AB 32), which requires public agencies in California to support the stateside goal of reducing greenhouse gas (GHG) emission to 1990 levels by 2020. In 2016, the State legislature adopted Senate Bill (SB) 32, which requires further reduction of GHG emissions to 40 percent below the 1990 level by 2030. In addition, Executive Order S-3-05 set a GHG reduction goal of 80 percent below 1990 levels by 2050.

a-b) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions greenhouse gases?

Less Than Significant. The Town of Paradise does not have a local GHG emission reduction plan, but the General Plan does include policies to increase energy efficiency (e.g., OCEG-10, OCEP-39). Future residential development related to the Project could result in an increase in GHG emissions from construction (e.g., operation of on-site heavy construction equipment, off-site construction vehicle trips) and operation (e.g., direct and indirect combustion of fossil fuels for generation of heat and electricity, decomposition of solid waste, wastewater treatment).

As previously discussed, in almost all cases, the sites identified for future residential development to accommodate the RHNA were previously developed with housing and almost the entirety (95 percent) of the Town’s RHNA was assigned to rebuild units lost in the Camp Fire. The potential increase in GHG emissions due to construction and operation of residential units would be comparable to pre-fire emissions. New units replacing destroyed units would be more energy efficient than previous residences given improved technologies and fixtures and updated requirements. The majority of the Town’s housing stock pre-fire was built between 1951 and 1970. New construction to replace the destroyed homes would be required to comply with Title 24 Building Energy Efficiency Standards and Green Building Standards. The Title 24 energy standards became effective January 1, 2020 and include residential building standards

related to energy efficient lighting, HVAC systems, walls, water heating, and attics.⁴ According to the California Energy Commission, carbon dioxide (CO₂) emissions will be reduced by 700,000 metric tons during the three-year cycle of these energy standards.⁵

Furthermore, the Project also includes policies and programs to further reduce the energy consumption of future residential households by increasing awareness of building methods and materials that increase resiliency (SP-53, SI-23), assisting low-income households to perform energy improvements (SI-2, SP-73, HI-20), and providing incentives for efficient air conditioning or cooling (SP-24, SI-9). The Project also includes policies to increase the use of low-water-use, drought-tolerant plant species in parks and private development (SP-51).

The Town's ongoing recovery has emphasized increased walkability. The construction of a transit center and grade-separated multi-use bicycle and pedestrian pathways along key evacuation routes are two planned multi-modal transportation improvements included in the Town's list of disaster recovery projects. The Paradise Transit Center is a shovel-ready project seeking construction funding and the multi-modal pathway is currently in the planning phase as part of the Transportation Master Plan. The Project builds on the Town vision for increased walkability. The Project seeks to incentivize multi-family development near services and create a more walkable pattern of development through the SSA zoning overlay. Such policies could reduce GHG emissions by encouraging use of public transit, walking, and biking as alternatives to private vehicles and by creating trip internalization.

For the reasons outlined above, the Project is consistent with the Town of Paradise General Plan energy goals, AB 32, and State's GHG reduction goals. Potential impacts on GHG emissions would be less than significant.

⁴ Title 24 also requires rooftop solar installations, but Assembly Bill 178 (2019) exempts those rebuilding after wildfires are exempt from this requirement if they rebuild before January 1, 2023.

⁵ California Energy Commission. Frequently Asked Questions – 2019 Building Energy Efficiency Standards. Available at https://www.energy.ca.gov/sites/default/files/2020-06/Title24_2019_Standards_detailed_faq_ada.pdf. Accessed on November 16, 2021.

9. Hazards and Hazardous Materials

| Would the project: | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|-------------------------------------|-------------------------------------|
| a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼-mile of an existing or proposed school? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the Project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a-c) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼-mile of an existing or proposed school?

Less Than Significant. Operations of future residential development does not typically include the routine transport, use, or disposal of hazardous materials. Any future development projects that do have the potential for using or containing hazardous substances or materials must be reviewed by the Butte County Environmental Health Department for compliance with applicable state and local regulations. The department, which is the Certified Unified Program Agency

(CUPA) for all cities and unincorporated areas in Butte County, is responsible for consolidating, coordinating, and making consistent the administrative requirements, permits, inspections, and enforcement activities of State programs regarding the transportation, use, and disposal of hazardous materials in Butte County. All land uses that handle or store hazardous materials are subject to inspections by the Environmental Health Department, which ensure compliance with State and federal laws intended to prevent potential hazards to the public and the environment.

Moreover, the Project includes policies and programs to facilitate the safe and effective management of hazardous wastes, including the identification of preferred transportation routes for hazardous wastes (SP-22), reduction of waste incentive programs, (SI-7) and community education on proper hazardous waste disposal (SI-15). Such programs could reduce risk and damages related to hazardous materials. Impacts from the Project would be less than significant.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less Than Significant. The Town of Paradise has one case that is listed as open on the State Water Resources Control Board GeoTracker website. The case is related to a 500-gallon underground storage tank discovered during Camp Fire debris removal southeast of the Clark Road/Cypress Lane intersection. Although the tank has been removed, the case is under investigation and kerosene is the potential contaminant of concern. The hazardous waste site (1620 Cypress Lane) is zoned for Community Services, is outside the SSA, and is not identified as a site for future residential development to accommodate the RHNA. There are sites identified for residential development near the hazardous site though, and it is possible that development under on those sites could locate residential development on a site impacted by hazardous materials listed on the Cortese list. All development pursuant to the Project would be reviewed against local, State, and federal regulations and cleaned up to residential use standards in conjunction with development of the site. As mentioned above, the Project includes policies and programs that could reduce risk and damages related to hazardous materials. Impacts from the Project would be less than significant.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The Paradise Skypark Airport is a privately-owned, public use airport located south of the Town limits. Airport-related hazards are generally associated with aircraft accidents, particularly during takeoffs and landings. Airport operation hazards include incompatible land uses, power transmission lines, wildlife hazards (e.g., bird strikes), and tall structures that present collision hazards and radar interferences. Land uses around airports are subject to the limitations established by the Airport Land Use Commission through the adoption of Airport Land Use Compatibility Plans. The Butte County Airport Land Use Compatibility Plan provides compatibility criteria for use by local jurisdictions in review of proposed development. There are

a few parcels identified in the Project for single-family rebuilds/new construction in the Airport Compatibility Zone and a few parcels in the SSA identified in the Project for medium-density multi-family residential development in the Airport Influence Zone.

As discussed under a-d) above, the Project does not include any specific development designs or proposals, nor does it grant any entitlements for development. The development of future housing pursuant to the Project would be required to comply with CEQA and the Town's environmental review regulations and would be checked for compliance with the Butte County Airport Land Use Compatibility Plan. This is consistent with policy and programs (e.g., SP-29, SI-12) of the Safety Element update. There would be no impacts from the Project.

f) *Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

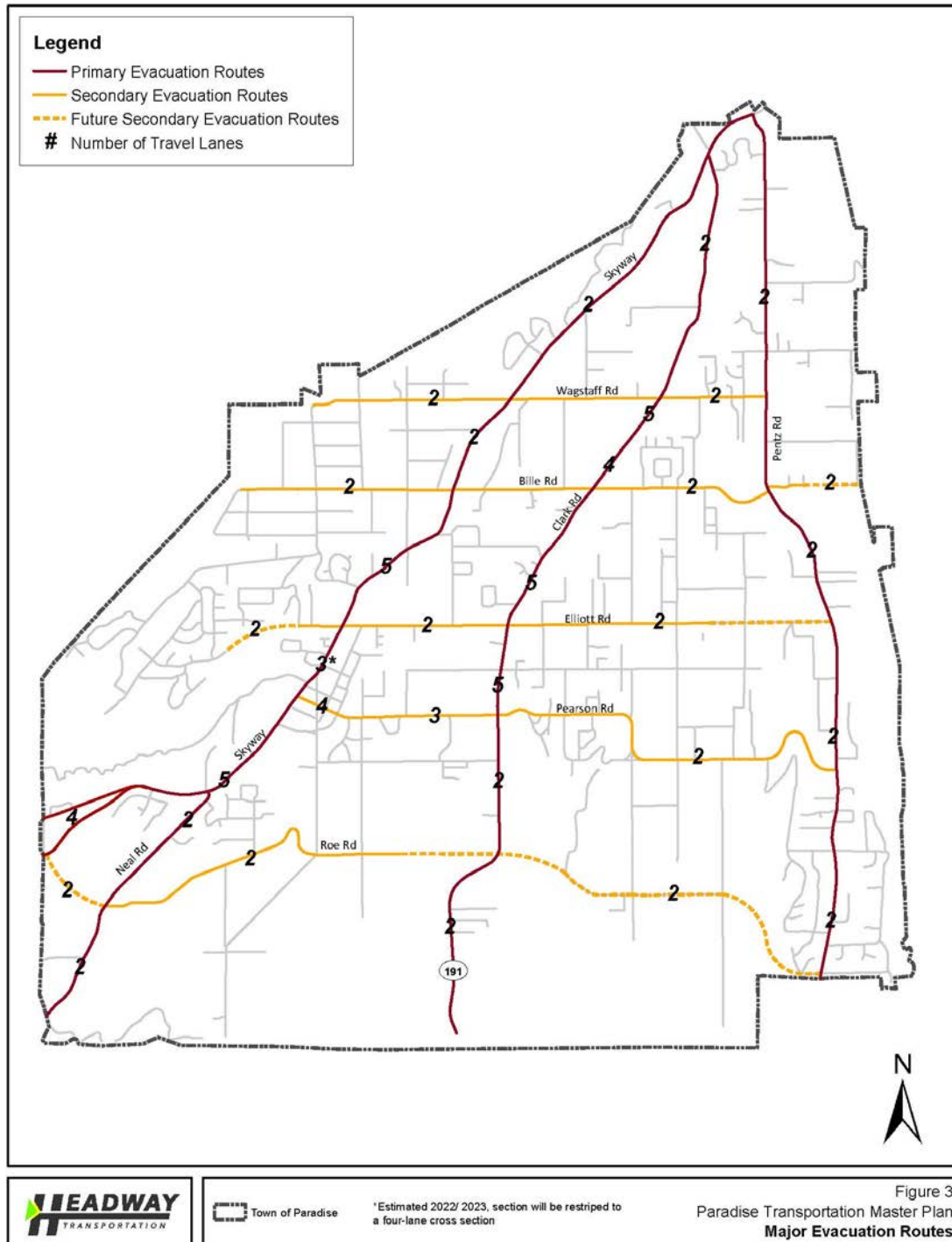
Less Than Significant. The Town of Paradise Emergency Operations Plan (EOP) (November 2011) addresses the Town's planned response to extraordinary emergency situations associated with natural disasters, technological incidents, and national security emergencies in or affecting the Town of Paradise. The EOP establishes the emergency management organization required to mitigate any significant emergency or disaster and identifies the roles and responsibilities required to protect the health and safety of Paradise residents and public and private property. The EOP also establishes the operational concepts associated with a field response to emergencies, the Town of Paradise Emergency Operations Center (EOC) activities, and the recovery process. The goals of the EOP are to mitigate hazards, meet basic human needs, address needs of people with access and functional needs, restore essential services, and support community and economic recovery. Future housing development pursuant the Project would not interfere with the EOP. Furthermore, the Safety Element would facilitate implementation of the EOP by working to mitigate hazards and increase public awareness around emergency preparedness, consistent with the EOP goals.

As shown in Figure 3, the main evacuation routes in Paradise are along Skyway, Clark Road, and Pentz Road. Each of these roads runs north-south and secondary evacuation routes run east-west to connect residents to these roads. Specific evacuation routes will vary depending on the emergency's location, direction, and rate of spread. As shown in Figure 4, the town is split into 14 evacuation zones. The zones allow officials to designate specific areas for evacuation advisories based on the emergency. The Town also has four designated assembly points. Assembly points are used to gather evacuees for immediate safety in situations where evacuation routes are not accessible or residents need assistance evacuating.

In addition, the Town's Transportation Master Plan (TMP) was developed in response to the Camp Fire and includes analysis and recommendations related to local road safety, evacuation planning, parking, and circulation/roadway improvements. The TMP provide recommendations related to emergency and traffic control plans; public-facing evacuation literature, websites, and maps; transportation improvements to address serious injury and fatal crashes and increase evacuation capacity; multi-agency coordination and agreement recommendations to facilitate an

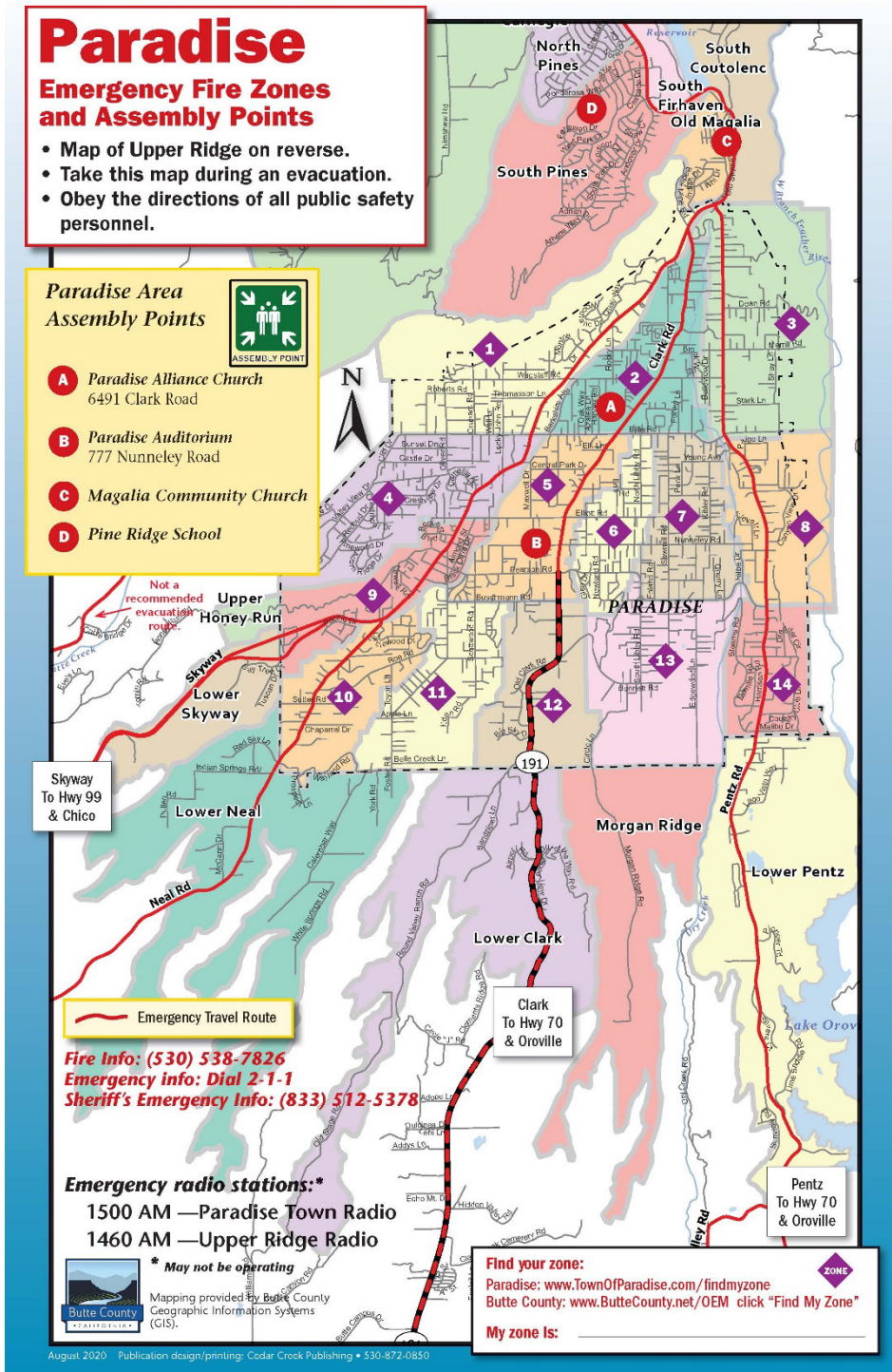
evacuation beyond the Town limits; and contraflow travel and controls during emergency events. Figure 3 shows the planned roadway improvements to repair damage from the Camp Fire and improve evacuation operations.

Figure 3 Evacuation Routes



Source: Town of Paradise and Headway, 2021.

Figure 4 Evacuation Zones



Source: Town of Paradise, 2022.

Finally, the Butte County Local Hazard Mitigation Plan (LHMP) also provides guidance on evacuation and emergency response. A component of Goal 4 of the LHMP is to “improve communities’ circulation, ingress and egress, and primary and secondary evacuation routes during disasters.” The LHMP identifies several high-priority actions relative to evacuation, including Action 4 to outfit Sheriff patrol cars with special sirens to be used during evacuation, Action 6 to develop a Butte County Fairground Emergency Shelter Operation Plan to improve operation of the fairground as an emergency evacuation shelter, Action 8 to expand the capacity of the Butte County Fairground to shelter more evacuees, and Actions 12 through 15 to make improvements to Cohasset Road, Concow Road, Skyway, Neal Road, Pentz Road, Hone Run Road and Centerville Road. The LHMP was adopted in 2019 and is annually reviewed by the Butte County Office of Emergency Services. The Project incorporates by reference the LMP and would facilitate, not impair, implementation of the LHMP.

The Project identifies parcels throughout the town as locations for potential future residential development to accommodate the RHNA. All sites would be located within one of the Town’s existing evacuation zones and future development pursuant to the Project would not physically interfere with the Town’s existing evacuation plans and policies nor with the improvements identified in the TMP. Instead, the Project facilitates smoother evacuation procedures by including programs and policies to cluster development and critical services in areas near evacuation routes; discourage development with poor evacuation access (SP-5, SP-30, SP-41); and provide education on emergency response and evacuation plans (SI-16), including evacuation simulations (SP-43, SI-19). Development in areas that is not as well-served by evacuation routes would be disincentivized through an impact fee or overlay zone (SP-46) and the Town would prohibit any increase of existing residential density on parcels that are served access by either an existing or resultant cul-de-sac exceeding a maximum length of 1,800 lineal feet (SI-19). Similarly, development of critical facilities in wildfire risk reduction buffers would be prohibited (SI-13).

The Project’s programs and policies are consistent with the EOP, Town evacuation plans, draft TMP (scheduled for review and adoption by the Town Council May 10, 2022), and LHMP. For these reasons, the Project would have a less-than-significant impact related to impairing or interfering with emergency response and evacuation.

g) *Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

Less Than Significant. Wildfires are a major hazard in Butte County and in the State of California. Wildland fires burn natural vegetation on developed and undeveloped lands and include timber, brush, woodland, and grass fires. While low intensity wildfires have a role in the ecosystem, wildfires put human health and safety, structures (e.g., homes, schools, businesses), air quality, recreation areas, water quality, wildlife habitat and ecosystem health, and forest resources at risk. Wildland fire hazards exist in varying degrees over approximately 70 percent of Butte County. The highest wildfire risk to human health and safety occurs in the

foothill communities, including in Paradise. This area is considered a wildland-urban interface (WUI). Fires that occur in the WUI affect natural resources as well as life and property. During the past decade, Butte County has experienced several large and damaging wildfires in and around the wildland-urban interface areas, including Paradise. In November 2018, Paradise and some surrounding areas in Butte County faced one of the most destructive wildfires in California history. This fire, known as the 2018 Camp Fire, resulted in the loss of 85 lives, nearly 19,000 structures, the burning of more than 150,000 acres over two weeks, and \$9 billion in insurance claims. It took less than six hours for the Camp Fire to destroy over 90 percent of Paradise. The vast majority of the town is identified by CAL FIRE as a very high fire hazard severity zone (VHFHSZ).

The Project identifies parcels throughout the town as locations for potential future residential development to accommodate the RHNA, including sites that are in the VHFHSZ. Future development would expose people or structure to wildland fire risk. However, the Project includes policies and programs to reduce fire risk, including but not limited to the creation of Wildfire Risk Reduction Buffers, the clustering of development in the SSA where it is flatter and easier to evacuate, establishment and enforcement of fuels management programs and education, analysis and potential implementation of more stringent fire-resistant building requirements, and implementation of community-wide evacuation drills. Such policies and programs would reduce the risk of loss, injury, or death due to wildfire.

As discussed above, the Project is a policy-level document that does not propose any specific development designs or proposals, nor does it grant any entitlements for development. Potential wildland fire impacts to subsequent development projects would also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Future development in the WUI would also be subject to applicable California Building Code and Board of Forestry requirements for development in the VHFHSZ. For these reasons, this impact is considered less than significant.

10. Hydrology and Water Quality

| Would the project: | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|-------------------------------------|
| a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: | | | | |
| i. Result in a substantial erosion or siltation on- or off-site; | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iv. impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| a) <i>Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?</i> | | | | |

Less Than Significant. Paradise is within the jurisdictional boundaries of the Central Valley Regional Water Quality Control Board (RWQCB), one of nine regional boards in the state. The Central Valley RWQCB develops and enforces water quality objectives and implementation plans that safeguard the quality of water resources in its region.

Future residential development under the Project could result in both construction and operational impacts to water quality and discharge standards. Potential operational impacts include the use of fertilizers, herbicides, and pesticides to maintain lawns, as well as motor vehicle operation and maintenance. Potential construction impacts include grading and vegetation removal activities that would result in the exposure of raw soil materials to the natural elements (wind, rain, etc.). All future residential development occurring in the town would be required to comply with all applicable regulations, including the requirements of the National Pollutant Discharge Elimination System (NPDES) Stormwater Permits enforced by the RWQCB. The NPDES permits require water quality and watershed protection measures for all development projects and prohibit discharges that would violate applicable water quality standards or result in conditions that create a nuisance or water quality impairment in receiving waters. Project construction contractors are also required to prepare a stormwater pollution prevention plan (SWPPP) pursuant to RWQCB standards and subject to RWQCB review and approval. The SWPPP must include measures to reduce or eliminate erosion and runoff into waterways during construction.

The Town of Paradise is the largest unsewered incorporated community in California. Wastewater treatment facilities in Paradise consist of privately owned septic tanks and soil absorption disposal systems known as leach fields, together with several engineered subsurface disposal systems serving commercial and institutional facilities. The Project includes a program (HI-1) to continue planning for a sewer system and to provide education to property owners and other stakeholders as planning continues. Program HI-5 would create a zoning overlay to allowed increased densities in the SSA. The Paradise Sewer Project is undergoing its own CEQA review (an EIR began in fall 2020) and the Project under review in this CEQA document does not propose to construct, nor does it require the construction of, such a sewer system. All future housing would be required to comply with the Town's wastewater regulations, including the determination of whether a project site's soils could support a septic system or other type of wastewater disposal. If groundwater is present anywhere on the subject parcel for development, the Town requires soils testing to determine whether an alternative wastewater is necessary. The test holes are dug in the presence of the Town's Onsite Sanitation Division Onsite Official. Water quality is reviewed for contamination through creek and groundwater monitoring performed by the Onsite Division.

For the reasons discussed above, the Project would have a less than significant impact on water quality.

- b) *Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

Less Than Significant. The primary source of water in Paradise is treated surface water from Magalia Reservoir and Paradise Reservoir. Groundwater supplies make up only a very small portion of the potable water supplies used to serve Paradise. Groundwater is therefore not

anticipated to be impacted by future development pursuant to the Project and impacts would be less than significant.

- c) *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*
- i. *result in a substantial erosion or siltation on- or off-site;*
 - ii. *substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;*
 - iii. *create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or*
 - iv. *impede or redirect flood flows?*

Less Than Significant. The Project identifies sites for future potential housing development and encourages a range of housing types at varying affordability levels. The Town has adequate vacant land that was previously developed and destroyed in the Camp Fire to accommodate its RHNA. If development of housing were to occur in previously undeveloped areas, increased impervious surfaces and grading and vegetation removal activities could increase surface runoff and potentially contribute to the potential for localized flooding and/or erosion. Future residential development in the town would be required to comply with NPDES stormwater permit requirements, California Building Code, and Town requirements related to erosion and drainage (e.g., Paradise Municipal Code Sections 8.56.130 - *Watercourse protection* and 17.06.800 - *Slope limitations*). Finally, the Project includes policies and programs to reduce the risks related to localized flooding (e.g., SI-6, SP-27), including a policy to update the Storm Drain Master Plan. Impacts from the Project would be less than significant.

- d) *In flood hazard, tsunami, or seiche zones, risk release pollutants due to project inundation?*

No Impact. Paradise's location on a ridge makes it less susceptible to flooding and it does not have any designated flood hazard areas as depicted on the Federal Emergency Management Agency (FEMA) Digital Flood Insurance Rate Map (DFIRM). The entire Town of Paradise is located outside both the 1 percent and 0.2 percent annual chance flood zone as defined by FEMA. It is not located near any ocean, coast, or seiche hazard areas. Any flooding that occurs is localized in nature, resulting from a temporary lack of capacity or blockage of a drainage basin. According to the Butte County Local Hazard Mitigation Plan, dam failure is unlikely in Paradise and limited in severity. The Paradise Dam north of the town is considered an Extremely High Hazard dam for inundation, but the inundation area is completely outside of the Town limits.

The Project includes policies and programs to reduce the risks related to localized flooding (e.g., SI-6, SP-27).

- e) *Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

Less Than Significant. The Central Valley Regional Water Quality Control Plan (Basin Plan) is the water control plan for Paradise's hydrologic area. The Basin Plan identifies objectives and implementation measures to protect water quality in the RWQCB's jurisdiction. Any future residential development identified within a water quality control or sustainable ground water management plan area would be required to follow it. Impacts from the Project would be less than significant.

11. Land Use and Planning

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|-------------------------------------|
| Would the project: | | | | |
| a. Physically divide an established community? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a) *Would the project physically divide an established community?*

No Impact. The parcels identified by the Project for future potential development to accommodate the Town’s RHNA are scattered throughout the town and intermixed with existing residential and mixed-use neighborhoods. The Project does envision denser development in the SSA where wastewater constraints would dissipate with the sewer system, but the SSA stretches through the majority of town and multi-family development is still envisioned and allowed outside of the SSA using clustered wastewater alternatives. The Project would not physically divide an established community. No impact would result from the Project.

b) *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

Less Than Significant. The Housing Element proposes changes to the existing Municipal Code and Zoning Map, including 12 sites to rezone and the creation of a new zoning overlay. Table 2 shows the sites in the SSA identified for rezoning. These sites were selected for a rezoning because either 1) the landowner does not have plans to rebuild the destroyed previous use and therefore new uses that leverage the site’s position in the SSA are an opportunity to meet the Town’s housing goals or 2) the previous, pre-fire use was non-conforming and the rezoning enables the previous use to return more easily. All sites in Table 3 would require an amendment to their General Plan Land Use designation in addition to rezoning.

TABLE 3 SEWER AREA REZONING

| APN | Address | Acreage | Current General Plan | Proposed General Plan | Current Zoning | Current Allowed Density | Proposed Zoning | Proposed Density |
|-----------------|------------------------|---------|----------------------|-----------------------|----------------|-------------------------|-----------------|------------------|
| 052-080-084-000 | Luther Dr | 0.23 | TR | C-S | TR 1/3 | 2 | CS | 20 du/ac |
| 052-080-083-000 | 805 Luther Dr | 0.48 | TR | C-S | TR 1/3 | 2 | CS | 20 du/ac |
| 052-080-090-000 | 806 Luther Dr | 0.53 | TR | C-S | TR 1/3 | 2 | CS | 20 du/ac |
| 052-080-089-000 | 804 Luther Dr | 0.52 | TR | C-S | TR 1/3 | 2 | CS | 20 du/ac |
| 052-080-069-000 | 784 Luther Dr | 0.31 | TR | C-S | TR 1/3 | 2 | CS | 20 du/ac |
| 052-191-009-000 | 3851 Honey Run Rd | 0.68 | RR | CC | RR 1/2 | 2 | CB | 30 du/ac |
| 052-193-017-000 | 3858 Honey Run Rd | 2.45 | TR | CC | TR 1/3 | 2 | CB | 30 du/ac |
| 053-080-038-000 | 100 Brookwood Cir | 0.51 | TR | TC | TR 1/3 | 2 | CC | 30 du/ac |
| 053-111-034-000 | 931 Elliott Road | 4.35 | CS | M-R | CS | 0 | MF | 30 du/ac |
| 052-204-001-000 | 5680 Black Olive Drive | 0.29 | PI | C-C | CF | 1 du/ac | CB | 30 du/ac |

Source: Town of Paradise, 2021.

Increased density in the SSA and other related policy changes are consistent with the General Plan, which includes an assumption that “a sewer system may be constructed” during the life of the General Plan and objective LUO-10 to “consider the construction and installation of a formal sewer system to service the commercial and industrial areas in the town.” The concentration of density along the Town’s main arterials going through the middle of town – where the town tends to be flatter and closer to evacuation routes, where traffic can be better accommodated, and where infrastructure constraints for wastewater would be alleviated with a potential sewer system – is consistent with the General Plan’s guiding principal to use environmental and infrastructure constraints to determine future zoning classifications and with General Plan policies and programs (e.g., LUP-2, LUP-19, LUP-45, LUP-48). Allowed increased density in the

SSA to provide more opportunity for affordable housing and different types of housing is consistent with the General Plan's policies to encourage a range of residential densities sufficient to meet the needs of residents (e.g., LUG-13, LUG-17).

Although the Project requires amendments to the General Plan and zoning map, these changes are not CEQA impacts in and of themselves. Instead, the proposed changes are consistent with the principal of using environmental and infrastructure opportunities and constraints to determine land uses and intensities. The potential future housing on these sites would also be consistent with surrounding uses. The Project is consistent with the General Plan and would not conflict with policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Impacts from the Project would be less than significant.

12. Mineral Resources

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| Would the project: | | | | |
| a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| a-b) <i>Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State? Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?</i> | | | | |

No Impact. The proposed sites identified to satisfy the RHNA are located within already established communities and/or neighborhoods where no known mineral resource would be foregone by possible residential development. The Town of Paradise is not classified by the Department of Conservation as having any Mineral Land Classification.⁶ The Project would have no impact on mineral resources.

⁶ California Department of Conservation, 2021. CGS Information Warehouse: Mineral Land Classification. Available at <https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc>. Accessed on November 12, 2021.

13.Noise

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|-------------------------------------|
| Would the project result in: | | | | |
| a) 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 applicable standards of other agencies? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Generation of excessive groundborne vibration or groundborne noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| a-b) <i>Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? Generation of excessive ground borne vibration or ground borne noise levels?</i> | | | | |

Less Than Significant. Project implementation could indirectly facilitate the construction of new housing in the future. The primary sources of noise associated with new housing development and operation are construction noise (short-term) and increased noise from vehicle traffic (operational). Housing is not typically considered a major source of noise, but new residential construction would generate temporary short-term sources of noise that would be subject to the Town’s allowable construction time periods. Increases in noise associated with vehicle traffic would be relatively minor, as the majority of the new residential development anticipated over the life of the Housing Element would be spread throughout the town. The Project does include policies related to infrastructure improvements, but these larger projects, including the Paradise Sewer Project, are independent of the Housing and Safety Element Updates and subject to their own CEQA review. Similarly, individual housing projects build under the Project would be subject to individual CEQA review, and a determination of potential noise impacts, and mitigation measures (if needed) would be identified. Future construction and operation would also be subject to the Town’s General Plan policies and Noise Ordinance, including noise performance standards and community noise exposure compatibility. Impacts from the Project would be less than significant.

- c) *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

No Impact. The nearest airport to the Town is the Paradise Skypark Airport. Development within the vicinity of the Paradise Skypark Airport is subject to the rules and requirements of the Butte County Airport Land Use Compatibility Plan, which restricts residential development within the airport overflight zones and within certain noise contour boundaries. Future development will be reviewed against the Airport Land Use Compatibility Plan and subject to CEQA. The Project does not include any specific development designs or proposals, nor does it grant any entitlements for development. The Project would have no impact.

14. Population and Housing

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|-------------------------------------|
| Would the project: | | | | |
| a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| a) <i>Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?</i> | | | | |

Less Than Significant. The Project contains goals, policies, and program to encourage housing to meet Paradise’s housing needs and would therefore accommodate growth rather than induce it. The 2022-2030 RHNA for the Project’s planning period is 7,179 units. The vast majority of the Town’s RHNA (95 percent) was allocated to rebuild and recovery from the Camp Fire; only 5 percent of the Town’s RHNA is to accommodate regional growth. The Project identifies land suitable to accommodate the RHNA and establishes policies and programs to ensure safe and decent housing. Future residential development in the town would be required to comply with local regulations and CEQA. Impacts from the Project would be less than significant.

b) *Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

No Impact. The population of Paradise remained relatively constant, within a few hundred people, between 2000 and 2018. The Town was projected to reach a population of 29,547 by 2030, a growth rate of less than 1 percent per year, which is about half as much growth as was expected for Butte County. However, according to California Department of Finance estimates, the 2018 Camp Fire led to a population decrease from 26,581 as of January 1, 2018 to 4,474 as of January 1, 2019. Population has since increased to 6,046 as of January 1, 2021.

As mentioned above, almost the entirety of the Town’s RHNA is to rebuild housing for those who lost their homes in the Camp Fire. The Project includes policies and programs to facilitate recovery and allow residents who have been displaced to return. The sites identified for residential development are all vacant properties or underutilized commercial properties. The realization of development of the sites identified to satisfy the RHNA would therefore not displace existing housing or create a situation where replacement housing would be necessary.

The Project does not include any specific development designs or proposals, nor does it grant any entitlements for development. There would be no impact.

15. Public Services

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| Would the project: | | | | |
| a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physical altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: | | | | |
| 1. Fire Protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 2. Police Protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3. Schools? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 4. Parks? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 5. Other public facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physical altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Fire protection, police protection, schools, parks, other public facilities?*

The following section addresses the project’s potential effects on: fire service, police service, schools, parks, and other public facilities. Impacts to public services would occur if the project increases demand for services such that new or expanded facilities would be required, and construction or operation of these new facilities would cause environmental impacts.

Fire Protection

Less Than Significant. The Town of Paradise and CAL FIRE provide fire protection services through a cooperative agreement. By contracting with CAL FIRE, the Town is able to staff two fire stations with three-person engine companies, and one station with a two-person engine company. In addition to the Town’s resources, CAL FIRE maintains their own stations in Paradise and the neighboring community of Magalia. These resources are available to assist with the Town’s fire protection efforts as necessary.

The Paradise General Plan establishes a standard of a five-minute response time for 90 percent of all emergency incidents within Town limits. According to Cal FIRE, this standard is typically met, and the average response time in Paradise is four to six minutes.

The Project does include a program to establish an overlay zone in the SSA that allows densities up to 30 dwelling units/acre, which is a higher intensity of development than the Town has previously seen. However, projects on these sites would be subject to CEQA review on a case-by-case basis following submittal of a specific development proposal and future development would comply with local regulations on emergency access. The Project only identifies sites for high density when the site is well-served by evacuation routes and does not have constrained access. The Project also includes policies and programs to ensure adequate emergency access (e.g., SI-11, SP-41, SI-19), maintain response times (e.g., SP 12, SP-13), and reduce fire severity and intensity (SG-5). Finally, the area of town identified for higher density development (i.e., the Sewer Service Area) is concentrated near the Paradise Fire Station #81. The concentration of multi-family units around this station would allow quick response times and reduce potential concerns from CAL FIRE related to call stacking.⁷ According to CAL FIRE, the current automatic aid agreement is sufficient to handle the Town's RHNA and increased population as the Town continues to rebuild, and the existing service delivery model is anticipated to accommodate buildout of the Project over the next eight years.⁸

The Project does not include any specific development designs or proposals, nor does it grant any entitlements for development. The projected population increase resulting from housing production envisioned under the Project would bring the Town back to pre-fire levels that were historically accommodated by services. For the reasons explained above any impacts would be less than significant.

Police Protection

Less Than Significant. The Paradise Police Department (PPD) currently has 19 employees, including 1 chief, 2 lieutenants, 5 sergeants, and 11 officers. PPD currently has 14 volunteer staff members as well, who assist with staffing the front counter, conducting live scan fingerprinting, conducting vacation home checks, deploying the speed display radar trailer, and assisting with traffic control for incidents and/or special events. PPD is also actively trying to fill current staff vacancies.

Patrol operations is the largest of the five units, with 11 authorized sworn patrol officers and 5 sergeants. Patrols provide 24/7 service every day of the year. Patrol personnel are the first responders to routine calls and crimes that are in progress. The Paradise Police Department is currently contracting 9-1-1 emergency and non-emergency dispatch services with the Butte County Sheriff's Office. PPD does not have a target officer ratio or established response time

⁷ Manson, Rick, Butte County Fire Chief, Cal Fire and Butte County Fire Department. 2021. Personal communication with Urban Planning Partners. March 31.

⁸ Ibid.

goals. Instead, PPD bases their response to meet the needs of a particular call for service. Officers are assigned to calls for service depending on level of priority and staff availability. The average emergency response time is just over five minutes, and the average non-emergency response time is just over seven minutes.⁹

The Project does include a program to establish an overlay zone in the SSA that allows densities up to 30 dwelling units/acre, which is a higher intensity of development than the Town has previously seen. However, projects on these sites would be subject to CEQA review on a case-by-case basis following submittal of a specific development proposal. The SSA is centered on the Town's major roads – Skyway and Clark Road – and therefore the denser projects envisioned under the Project would be more easily accessible to emergency services. The Project only identifies sites for high density when the site is well-served by evacuation routes and does not have constrained access. The housing production envisioned under the Project would bring the Town back to pre-fire population levels that were historically accommodated by services. PPD uses calls for service and crime rates to monitor staffing needs and, independent of the Project, will be tracking and adapting their operations as population returns. PPD anticipates that their current model and facilities will carry them into the future and the buildout of the Project would not require new facilities.¹⁰ PPD estimated that current facilities could last up to another 20 years and has actively maintained their equipment to stay up to date on trends and to ensure their employees have the necessary tools to do their jobs. Potential impacts to police protection services would therefore be less than significant.

Schools

Less Than Significant. The Paradise Unified School District (PUSD) currently serves approximately 3,500 students across three elementary schools, one middle school, two high schools, and one online learning academy. Due to the 2018 Camp Fire, multiple school sites are undergoing improvements, supported by local Measure Y, which will expand and improve the current school infrastructure. There are presently adequate busses for each school site. The Paradise Unified School District has approved a Facilities Master Plan Update, which was revised in 2020 following the Camp Fire. Phase One of this plan, which involves renovation of the existing high school and the addition of another high school, is expected to begin in 2023. The growth envisioned in the Master Plan Update is consistent with the Town's current rate of rebuilding and with the buildout anticipated under the Project.¹¹

The Project does include a program to establish an overlay zone in the SSA that allows densities up to 30 dwelling units/acre, which is a higher intensity of development than the Town has previously seen. However, housing production envisioned under the Project is largely to rebuild

⁹ Reinbold, Eric, Chief of Police, Paradise Police Department. 2021. Personal communication with Urban Planning Partners. November 3.

¹⁰ Reinbold, Eric, Chief of Police, Paradise Police Department. 2022. Personal communication with Urban Planning Partners. March 31.

¹¹ David McCreedy, Assistant Superintendent, Business Services, Paradise Unified School District. 2022. Personal communication with Urban Planning Partners. April 4.

units lost to the Camp Fire. The Project would help facilitate residents' return to Paradise and the Project would bring the Town back to pre-fire population levels that were historically accommodated by services, including school services. PUSD currently has extra capacity and based on the Facilities Master Plan, has the ability to accommodate future population from development associated with the Project. Therefore, impacts to schools are less than significant.

Parks

Less Than Significant. The Town of Paradise is located within the Paradise Recreation and Park District (PRPD), which serves over 50,000 individuals in the Town of Paradise and some surrounding areas within Butte County. The PRPD maintains 73 acres of developed park land and another 358 acres of natural open space. The Town of Paradise residents have complete access to facilities, programming, and special events.

The Project does include a program to establish an overlay zone in the SSA that allows densities up to 30 dwelling units/acre, which is a higher intensity of development than the Town has previously seen. However, projects on these sites would be subject to CEQA review on a case-by-case basis following submittal of a specific development proposal. Furthermore, the housing production envisioned under the Project is largely to rebuild units lost to the Camp Fire. The Project would help facilitate residents' return to Paradise and the Project would bring the Town back to pre-fire population levels that were historically accommodated by services, including parks services. Finally, the Project includes additional Open Space provisions for wildfire buffers. The implementation of the wildfire buffers would increase the open space facilities available to the community.

Independent of the Project, the PRPD is planning for new recreation centers, community parks, trails, and improved access to existing park land, as well as rebuilding of park facilities following the Camp Fire. Development under the Project would not result in a need for new or physically altered facilities, the provision and/or construction of which would result in a significant impact to the environment.¹²

Other Public Facilities

Less Than Significant. Development of the Project could also increase demand for other public services, including libraries and community centers. However, the increased residential population that would result from the Project would not substantially increase the use of these facilities beyond how they were used prior to the fire, such that new facilities would be needed to maintain service standards, as these facilities are not currently overused. The Paradise Branch of the Butte County Library is currently operating with less staff and fewer hours than pre-fire levels given the decrease in population since the fire. As the population grows, the library would like to increase their staffing and operations; upon implementation, the Project

¹² Efseaff, Dan, District Manager, Paradise Recreation & Park District. 2021. Personal communication with Urban Planning Partners. December 6.

may result in increased demand that could require additional library staffing and programming, which is determined by Butte County on an as-needed basis. The library utilizes gate counts, program attendance rates, and counts of checked out items to determine when greater programming or staffing is needed. The provision of additional staff or extending library hours or programs would not have a substantial adverse physical impact on the environment. In fact, the Paradise Library is currently considering expansion of the “Open Plus System” to allow remote access to library services outside of regular hours with a library card. Such solutions would allow increased operations without affecting staffing or facilities. The Paradise Library has adequate physical capacity to accommodate the return of population to pre-fire levels, including population growth associated with the Town’s RHNA.¹³ Therefore, impacts to other public facilities would be less than significant.

¹³ Sufi, Narinder. Butte County Librarian, Butte County Library. 2022. Personal Communication with Urban Planning Partners. March 30.

16.Recreation

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|-------------------------------------|--------------------------|
| Would the project: | | | | |
| a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| a) <i>Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?</i> | | | | |

Less Than Significant. The Town of Paradise is located within the Paradise Recreation and Park District (PRPD), which serves over 50,000 individuals in the Town of Paradise and some surrounding areas within Butte County. The PRPD maintains 73 acres of developed park land and another 358 acres of natural open space. The Town of Paradise residents have complete access to facilities, programming, and special events.

The Project would not increase the use of existing recreational facilities because most of the housing units to accommodate the Town’s RHNA would be replacing units lost in the Camp Fire. Pre-fire population levels were historically accommodated by services, including parks services. As previously mentioned, the Project also has the potential to increase the amount of open space/recreational space available to residents because it includes policies and programs to explore establishing open space wildfire buffers in key locations. Impacts from the Project would be less than significant.

b) *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

Less Than Significant. The Project does not require the construction or expansion of recreational facilities; however it does propose the possibility of establishing Wildfire Risk Reduction Buffers (e.g., SI-3, SP-46) that could take the form of open space. The Town would need to acquire land and/or establish a partnership with landowners to realize this vision; the Project only puts forward the idea of open space buffers as a concept that would need to be refined. If successful, the establishment of Wildfire Risk Reduction Buffer parks would be subject to all local and State requirements, including CEQA review.

As previously mentioned, the PRPD is rebuilding park facilities following the Camp Fire and planning for new recreation centers, community parks, trails, and improved access to existing park land independent of the Project. PRPD's expansion of facilities is independent of the Project and the Project does not include or require new or expanded facilities that would result in a significant impact to the environment.¹⁴

¹⁴ Efseaff, Dan, District Manager, Paradise Recreation & Park District. 2021. Personal communication with Urban Planning Partners. December 6.

17. Transportation and Traffic

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| Would the project: | | | | |
| a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Result in inadequate emergency access? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| a) <i>Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?</i> | | | | |

Relevant transportation plans and policies include the Butte County Association of Governments (BCAG) 2020 Regional Transportation Plan/Sustainable Communities strategy (RTP/SCS), Paradise General Plan Circulation Element, and Transportation Master Plan.

RTP/SCS

The RTP/SCS specifies the policies, projects, and programs necessary over a 20 or more-year period to maintain, manage, and improve the region’s transportation system. The Butte County Association of Governments (BCAG) published the 2020 RTP/SCS in 2020 (adopted December 10, 2020). BCAG also prepared and certified the 2020 Regional Transportation Plan/Sustainable Communities Strategy Supplemental Environmental Impact Report (RTP/SCS SEIR) and adopted a Statement of Overriding Consideration for significant and unavoidable impacts related to transportation based upon the inability to meet state VMT requirements, largely as a result of the Camp Fire based upon the nature of the VMT calculation. The RTP/SCS SEIR included the following two-part mitigation measure (MM) (MM T-1) prescribing local and regional mitigations to reduce vehicle miles traveled (VMT):

The state recognized that additional state policy actions and funding would be required to close the VMT gap between what the MPOs could achieve through implementation of their SCSs, and reductions needed to meet state goals. Though the state must initiate these additional actions and funding programs, the exact form of the policies and funding programs must be collaboratively developed with input from MPOs, local agencies, and other organizations to ensure they provide the tools and incentives necessary to go beyond the SCSs in reducing VMT.

Consequently, BCAG shall work collaboratively with Butte County and the cities of Biggs, Chico, Gridley, Oroville, and Town of Paradise to support implementation of regional and local-level strategies and measures to achieve further VMT reductions. Implementing agencies (i.e., Butte County and the cities of Biggs, Chico, Gridley, Oroville, and Paradise) shall implement the following strategies to reduce VMT.

Local Level

Implementing agencies shall require implementation of VMT reduction strategies through transportation demand management (TDM) programs, impact fee programs, mitigation banks or exchange programs, in-lieu fee programs, or other land use project conditions that reduce VMT. Programs should be designed to reduce VMT from existing land uses, where feasible, and from new discretionary residential or employment land use projects. The following strategies from Quantifying Greenhouse Gas Mitigation Measure, CAPCOA, August 2010 were identified as strategies most suited to Butte County and the cities of Biggs, Chico, Gridley, Oroville, and Town of Paradise, given the rural and suburban land use context:

- 1. Increase diversity of land uses** – This strategy focuses on the inclusion of mixed uses within projects or in consideration of the surrounding area to minimize vehicle travel in terms of both the number of trips and the length of those trips.
- 2. Provide pedestrian network improvements** – This strategy focuses on creating a pedestrian network within the project and connecting to nearby destinations. Projects in Butte County tend to be small, so the emphasis of this strategy would likely be the construction of network improvements that connect the project site directly to nearby destinations. Alternatively, implementation could occur through an impact fee program or benefit/assessment district targeted to various areas in the county designated for improvements through local or regional plans. Implementation of this strategy may require regional or local agency coordination and may not be applicable for all individual land use development projects.
- 3. Provide traffic calming measures and low-stress bicycle network improvements** – This strategy combines the CAPCOA research focused on traffic calming with new research on providing a low-stress bicycle network. Traffic calming creates networks with low vehicle speeds and volumes that are more conducive to walking and bicycling. Building a low-stress bicycle network produces a similar outcome. Implementation options are similar to strategy 2 above. One potential change in this strategy over time is that e-bikes (and e-scooters) could extend the effective range of travel on the bicycle network, which could enhance the effectiveness of this strategy.
- 4. Implement car-sharing program** – This strategy reduces the need to own a vehicle or reduces the number of vehicles owned by a household by making it convenient to access a shared vehicle for those trips where vehicle use is essential. Note that implementation of this strategy would require regional or local agency implementation and coordination and would not likely be applicable for individual development projects.
- 5. Increase transit service frequency and speed** – This strategy focuses on improving transit service convenience and travel time competitiveness with driving. Given land use density in Butte County, this strategy may be limited to traditional commuter transit where trips can be pooled at the start and end locations or require new forms of demand-responsive transit service. The demand-responsive service could be provided as subsidized trips by contracting to private Transportation Network Companies (TNCs, such as Uber, Lyft, and Via) or taxi companies. Alternatively, a public transit operator could provide the subsidized service but would need to improve on traditional cost effectiveness by relying on TNC ride-hailing technology, using smaller vehicles sized to demand, and flexible driver employment terms where drivers are paid by trip versus by hour. Note that implementation of this strategy would require regional or local agency

implementation, substantial changes to current transit practices, and would not likely be applicable for individual development projects.

6. Implement subsidized or discounted transit program – This strategy reduces the need to own a vehicle or reduces the number of vehicles owned by a household by incentivizing individuals to use transit for their daily commute. This strategy depends on the ultimate building tenants – whether residential landlords or businesses – and may require monitoring. This strategy also relies on B-Line continuing to provide similar or better service throughout the county, in terms of frequency and speed.

7. Encourage telecommuting and alternative work schedules – This strategy relies on effective internet access and speeds to individual project sites/buildings to provide the opportunity for telecommuting. The effectiveness of the strategy depends on the ultimate building tenants and the nature of work done by tenants’ employees (can the work be done remotely in the first place?); two factors that should be considered for potential VMT reduction. Effectiveness may also be limited in more rural areas of the county with limited broadband internet access.

8. Provide ride-sharing programs – This strategy focuses on encouraging carpooling and vanpooling by project site/building tenants, which depends on the ultimate building tenants; this should be a factor in considering the potential VMT reduction.

Regional

Implementing agencies shall require project modifications during the project design and environmental review stage of project development that would reduce VMT effects. For roadway capacity expansion projects, this would include but is not limited to demand management through transportation systems management and operations (TSMO) including the use of pricing.

The Town of Paradise specifically has adopted MM T-1 of the RTP/SCS SEIR as Town policy. On April 12, 2022 the Town adopted Resolution No. 2022-24, which adopted the VMT policies found in Appendix B.

In addition to policies related to VMT, the RTP/SCS has broader goals and policies related to the transportation system. The goals of the RTP/SCS are as follows:

1. **Highways, Streets, and Roads.** A safe and efficient regional road system that accommodates the demand for movement of people and goods.
2. **Transit.** Provide an efficient, effective, coordinated regional transit system that increases mobility for urban and rural populations, including those located in disadvantaged areas of the region.
3. **Rail.** A rail system that provides safe and reliable service for people and goods.
4. **Goods Movement.** Provide a transportation system that enables safe movement of goods in and through Butte County.
5. **Aviation.** A fully functional and integrated air service and airport system complementary to the countywide transportation system.
6. **Non-Motorized Transportation.** A regional transportation system for bicyclists and pedestrians.
7. **Intelligent Transportation System (ITS).** Promote the use of ITS technologies in the planning and programming process.

8. **Energy.** Reduce usage of nonrenewable energy resources for transportation purposes.
9. **Air Quality.** Achieve air quality standards set by the Environmental Protection Agency (EPA) and the State Air Resources Board.
10. **Land Use Strategies.** Provide economical, long-term solutions to transportation problems by encouraging community designs which encourage walking, transit, and bicycling.
11. **Transportation Financing.** Develop and support financing strategies that provide for continuous implementation of the Regional Transportation Plan projects and strategies.
12. **Outreach and Coordination.** Provide a forum for participation and cooperation in transportation planning and facilitate relationships for transportation issues that transcend jurisdictional boundaries.
13. **Quality of Travel and Livability.**

Mobility. The transportation system should provide for convenient travel options for people and goods and maximize its productivity. The system should reduce both the time it takes to travel as well as the total costs of travel.

Reliability. The transportation system should be reliable so that travelers can expect relatively consistent travel times from day-to-day for the same trip by mode(s).

System Preservation and Safety. The public's investment in transportation should be protected by maintaining the transportation system. It is critical to preserve and ensure a safe regional transportation system.

14. **Sustainability.** Incorporate Sustainable Community Strategies into the regional transportation planning process which works towards social equity, a healthy environment and a prosperous economy.
15. **Emergency Preparedness.** To support and collaborate on proactive emergency planning and projects. Projects that increase emergency readiness and preparedness including upgrading and maintaining roadways, public transit or facilities that support emergency situations.
16. **Housing.** To support and collaborate on proactive efforts to address housing needs in the region.

The RTP/SCS includes a number of objectives and policies/actions to implement these goals, including the provision of complementary "dial-a-ride" transit services for the elderly, persons with disabilities, or those who are not served by a fixed route transit service; supporting the acquisition of funding and other planning activities for complete streets and active transportation; increasing transit service where feasible; supporting vanpooling and carpooling programs; and supporting and encouraging infill development that is friendly to pedestrians and bicyclists.

General Plan

The Town's General Plan includes the goals, objectives, policies, and implementation measures related to transportation and circulation as listed below. Although the General Plan has goals, objectives, policies, and implementation measures related to maintaining mobility as measured through Level of Service (LOS), LOS is no longer deemed an appropriate transportation measure of environmental impact under CEQA and is therefore not relevant to this Initial Study of potential CEQA impacts.

Goals

- **CG-1.** Support cooperative and coordinated transportation planning and development activities with federal, state, regional, and local agencies in order to assure maximum coordination of effort in the Paradise region.
- **CG-2.** Provide safe, efficient, and effective traffic flow, both within Paradise and between Paradise and its environs.
- **CG-3.** Enhance and improve pedestrian and bicycle safety and use by establishing additional linkages between areas of town.
- **CG-4.** Provide adequate access, including access for emergency vehicles and evacuation, to all new parcels and to existing parcels when feasible.
- **CG-5.** Maintain and improve local and regional air quality.
- **CG-6.** Reduce reliance on the automobile by careful land use planning and encourage the use of non-automobile travel modes through a balanced and integrated set of land use and transportation planning policies.

Objectives

- **CO-3.** Assure that traffic generated by high density residential land use development will not exceed roadway capacity and level of service standards.
- **CO-5.** Plan and complete public street improvements to accommodate projected traffic during the planning period.
- **CO-6.** As necessary, revise and update both the bicycle and pedestrian and the Paradise Memorial Trailway master plans.
- **CO-10.** Encourage efforts to significantly reduce reliance on the private automobile during the fifteen-year planning period.

Policies

- **CP-1.** The town shall strive to maintain a level of service (LOS) "D" or better as the standard for new and existing roadways in the Paradise planning area. LOS "D" or better should be maintained on all local streets within the town limits, and LOS "C" or better should be maintained whenever feasible.

- **CP-4.** New land use development shall be required to mitigate its share of the circulation impacts it creates.
- **CP-5.** Methods of recovering costs associated with use of roadways within the Town of Paradise by residents of the Upper Ridge should be explored, including imposition of development impact fees.
- **CP-10.** Safe paths for pedestrians, equestrians, and bicyclists should be provided, particularly for school children and the elderly. A sidewalk and pathway development program should be instituted for selected locations and where feasible should link with the Paradise Memorial Trailway.
- **CP-12.** The Town shall encourage Butte County to require development applications within the secondary planning area [Sphere of Influence] to dedicate and improve streets to town standards and to provide other transportation improvements (e.g., bus stops, park-and-ride lots).
- **CP-13.** Automobile dependency within Paradise should be reduced for local residents and visitors by implementing congestion management and trip reduction plan programs that decrease the number of vehicle miles travelled which, in turn, reduces air pollution and congestion and saves energy.
- **CP-14.** As staff and funding become available, expanded transit services for seniors and the handicapped should be promoted in accordance with the results of future studies.
- **CP-15.** Expand public transportation services within Paradise and between Paradise and major employment centers as feasible, based on service demand and financial constraints.
- **CP-17.** Whenever the LOS “D” is reached on roadways within Paradise, the town shall explore all feasible alternatives for improving traffic flow, rather than automatically implementing a road widening project.
- **CP-19.** As staff and resources become available, the town should strive to increase the transit opportunities for children and senior citizens in the community.

Implementation Measures

- **CI-3.** Establish a town wide development impact fee program, and review and update on an annual basis.
- **CI-6.** Identify locations for sidewalks and pathways along existing major collector and arterial roadways as well as standards for requiring sidewalks adjacent to new developments.
- **CI-7.** Require new development to provide a pedestrian pathway on at least one side of new public streets and new private roads (if feasible).
- **CI-8.** Improve shoulders of some roads to make them safer for pedestrians and bicyclists and relocate mailboxes where feasible from sidewalks.
- **CI-9.** Require transportation facilities such as bus stops to be incorporated into major new developments.

Transportation Master Plan

The Town will review and consider the TMP for adoption on May 10, 2022. The TMP guides long-term transportation improvements and envisions safe, modern travel options, and efficient evacuation routes for the Town's residents, business owners, and visitors.

Key components of the TMP include:

- **Traffic needs analysis:** This analysis will recommend improvements to the roadway system serving connections to schools, parks, shopping areas, jobs, and local homes. The recommended concepts will address traffic and circulation needs for all roadway users.
- **Traffic evacuation planning:** This planning analyzes the Town's transportation network to serve traffic evacuation needs and will address pinch points, improve the backbone network, identify new connections, facilitate operations during an evacuation, and coordinate with regional partners and public safety responders.
- **Active Transportation Plan:** This plan will evaluate opportunities for walking paths, sidewalks, and bikeways and will position the Town to pursue grant funding for implementation.

As part of the evacuation planning, the Town is determining major and secondary evacuation routes, potential areas of congestion, and opportunities for roadway extensions and connections on dead-end streets for additional routes and increased evacuation capacity. Other components of the TMP include economic/redevelopment support, new roadway standards, and major projects coordination.

Impact Assessment

Less than Significant. Development associated with the Project would be comprised largely of reconstructing dwelling units destroyed by the Camp Fire. An analysis prepared by Kittelson & Associates, Inc. (Kittelson), attached and incorporated as Appendix A, concluded that no components of the Project conflict with the transportation plans or their goals, objectives, policies, and implementation measures described above. Similarly, no aspect of the Project conflicts with existing or planned bicycle facilities, rail facilities, or transit service. Additionally, development that occurs as part of the Project (Housing Element implementation) will comply with the VMT policies identified in the RTP/SCS and provided in Appendix B. The VMT policies were adopted by the Town on April 12, 2022. Policies in the RTP/SCS will promote future residential development to align with existing regional programs, plans, ordinances, and policies:

- **Increase diversity of land uses.** The Project includes policies to facilitate the development of a mix of uses in the Downtown, which can help minimize the number and length of vehicle trips.

- Provide pedestrian network improvements. Network improvements that connect individual sites to existing networks and nearby destinations would improve opportunities for walking in Paradise.
- Provide traffic calming measures and low-stress bicycle network improvements. Providing low-stress bicycle infrastructure that connects areas of proposed development to existing and planned networks would improve opportunities for biking in Paradise.

For these reasons, the Project would not conflict with adopted plans, ordinances, or policies addressing the safety and performance of the circulation system. This is a less-than-significant impact; no mitigation measures are required. This finding is consistent with the RTP/SCS Supplemental Environmental Impact Report (SEIR) Impact T-1 finding.

- b) *Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)? (i.e., a proposed residential project in an area exceeding a level of 15% below existing regional average home-based VMT per resident)*

Less Than Significant. Senate Bill 743 (SB 743) was signed into law in September 2013. Senate Bill 743 (Steinberg, 2013) required changes to the CEQA Guidelines regarding the analysis of transportation impacts. Historically, CEQA transportation analyses of individual projects determined impacts in the circulation system in terms of roadway delay and/or capacity at specific locations. SB 743 eliminated auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts and instead identified vehicle miles traveled (VMT) as the most appropriate metric to evaluate a project's transportation impacts. Since the bill has gone into effect, automobile delay, as measured by "level of service" and other similar metrics, no longer constitutes a significant environmental effect under CEQA (although such metrics may continue to be a measure for planning purposes).

In December 2018, the California Governor's Office of Planning and Research (OPR) and the State Natural Resources Agency submitted updated CEQA Guidelines to the Office of Administrative Law for final approval to implement SB 743. The Office of Administrative Law approved the updated CEQA Guidelines, thus implementing SB 743 and making VMT the primary metric used to analyze transportation impacts. The final text, final statement of reasons, and related materials are posted at <http://resources.ca.gov/ceqa>. The changes have been approved by the Office of the Administrative Law and are now in effect. For land use and transportation projects, SB 743-compliant CEQA analysis became mandatory on July 1, 2020.

Kittelson prepared a VMT assessment (see Appendix A) utilizing the BCAG travel demand model to assess the baseline and future year average VMT per resident for the transportation analysis zones (TAZs) that comprise the Paradise planning area and Butte County. The model outputs are shown in Table 4. As shown in Table 4, the average VMT per resident in Paradise is 36 to 42 percent higher than the county average in baseline and future year conditions, respectively. Table 4 also shows the VMT level that represents 15 percent below the countywide average, or the CEQA threshold.

TABLE 4 BCAG TRAVEL DEMAND MODEL DAILY HOME-BASED VMT PER RESIDENT

| Planning Area | Model Year 2020 | Model Year 2045 |
|-----------------------------------|------------------------|------------------------|
| Butte County Average | 11.6 | 12.3 |
| Level at 15% Below County Average | 9.9 | 10.5 |
| Paradise | 15.8 | 17.5 |

Source: Kittelson, 2022.

As shown in Table 4, the average VMT per resident in Paradise is 60 or more percent higher than the impact threshold of 15 percent below existing regional average home-based VMT per resident. This is consistent with the findings of the RTP/SCS EIR. As previously mentioned, BCAG certified the RTP/SCS SEIR and adopted a Statement of Overriding Considerations for the significant and unavoidable impacts, including significant and unavoidable impacts related to VMT. The Town subsequently relied on the SEIR to adopt the SCS/RTP and established Mitigation Measure T-1 or the RTP/SCS as Town policy (VMT policies). The VMT policies are included in Appendix B and include the following strategies:

1. Increase diversity of land uses.
2. Provide pedestrian network improvements.
3. Provide traffic calming measures and low-stress bicycle network improvements.
4. Implement car-sharing program.
5. Increase transit service frequency and speed.
6. Implement subsidized or discounted transit program.
7. Encourage telecommuting and alternative work schedules.
8. Provide ride-sharing programs.

In developing the 2020 RTP/SCS, BCAG utilized a “medium growth” scenario shown in Table 5 based upon the best available data at the time given the disruptions posed by the Camp Fire during the RTP/SCS development process. Consistent with Government Code Section 65584.04(e), BCAG also utilized the RTP/SCS in the Regional Housing Needs Plan, which issued the RHNA allocations to all Butte County jurisdictions. Table 1 in the project description shows the Paradise allocation. Table 6 compares Paradise’s growth scenario in the RTP/SCS, the growth that would be realized with achievement of the Town’s RHNA, and the growth that would be realized with achievement of the quantified objective of the Housing Element. As shown in Table 6, the growth the Town would undergo pursuant to the Project is consistent with the growth projected in the 2020 RTP/SCS and evaluated in the RTP/SCS SEIR.

TABLE 5 BCAG HOUSING FORECASTS - TOTAL DWELLING UNITS 2018-2040

| Jurisdiction | 2018 | 2020 | 2025 | 2030 | 2035 | 2040 | Total Increase 2018-2040 | Percent Increase 2018-2040 |
|--------------|--------|-------|-------|-------|--------|--------|--------------------------|----------------------------|
| Paradise | 13,091 | 1,916 | 6,490 | 9,318 | 10,811 | 11,347 | -1,744 | -13% |

Note: 2018 dwelling unit count obtained from State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties, and the State, 2010-2019, with 2010 Benchmark. Sacramento, California, May 2019.

Source: Kittelson, 2022 and BCAG RTP/SCS.

TABLE 6 PARADISE GROWTH PROJECTS – TOTAL DWELLING UNITS

| Scenario | 2030 |
|--|-------|
| 2020 RTP/SCS | 9,318 |
| Full buildout of RHNA | 9,095 |
| Full buildout of quantified objectives | 4,936 |

Source: Kittelson, 2022, Town of Paradise, 2022, and Urban Planning Partners, 2022.

The finding that implementation of the Project would result in a significant VMT impact is consistent with the findings of the RTP/SCS SEIR. Furthermore, because the growth that could occur pursuant to the Project is within the level of growth analyzed in the RTP/SCS SEIR, the Project’s VMT impacts have already been evaluated and the VMT impacts associated with the Project are no more severe than previously identified. As mentioned above, at the time of adopting the policy, the Town has adopted a Statement of Overriding Considerations related to VMT impacts of future growth within the RTP/SCS, which is greater than the buildout anticipated under the Project. Future development pursuant to the Project would be subject to the Town’s VMT policies, including providing pedestrian network improvements, traffic calming measures, and low-stress bicycle network improvement, and therefore no additional mitigation is needed. Impacts from the Project would be less than significant.

Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less than significant. The Project designates future feasible sites for residential development and is proposing to increase the amount and density of residential land uses. The Housing Element includes programs to rezone land within the Town’s planned Sewer Service Area. A Sewer Service Overlay Zoning District would be established with implementation of the Project that would apply only when the sewer is implemented. Most notably, the Sewer Service Overlay Zone would increase the allowed residential density in the Community Facilities (C-F) zone from 1 dwelling unit per acre to 20 dwelling units per acre. Other changes would be less substantial,

and the project identifies residential development sites only where adjacent land uses are compatible. Therefore, the project would not introduce incompatible land uses.

The Safety Element also contains programs and policies related to evacuation planning, but it does not propose new roadway design features. Rather, any future residential development covered in this Project would be subject to local development review to include a review of design features and would be required to comply with all local and State design guidelines.

Consistent with the RTP/SCS Impact T-3 finding and as described in Appendix A, the Project is not anticipated to cause a substantial increase in hazards due to design features or incompatible uses and impacts would be less than significant.

c) *Result in inadequate emergency access?*

Less than significant. Development pursuant to the Project would be subject to Town review and the Town would coordinate with individual projects to ensure that emergency routes are not blocked and remain available during construction. In addition, the Safety Element includes policies to ensure future housing development has adequate emergency access, as summarized below.

- **TMP Implementation.** The Safety Element includes programs to execute recommended circulation improvements that will provide benefits for emergency preparedness, response, and evacuation. Through the development review process and in accordance with the Butte County Community Wildfire Protection Plan, adequate roads shall be required to be constructed and/or improved for emergency vehicle access, particularly in high wildland fire hazard areas.
- **Density Discretion.** The Town would continue to limit the densities of development on parcels that do not have adequate emergency access. At a minimum, the Town would not approve any discretionary permit or project that requests an increase of existing residential density on parcels that are served access by either an existing or resultant cul-de-sac exceeding a maximum length of 1,800 lineal feet. The Safety Element would require that the Town also continue to look to the TMP and Board of Forestry for guidance on potentially developing more stringent access requirements.
- **Response Times.** New development pursuant to the Project would largely replace units lost in the Camp Fire and response times and levels of service are anticipated to be sufficient to accommodate this incremental population growth. In addition, the Town would strive to maintain an overall fire insurance (ISO) rating of three or better, and an emergency fire response within five minutes for 90 percent of all emergency incidents within the Town Limits, as specified in SP-13 of the Safety Element.

Consistent with the RTP/SCS T-4 finding and as analyzed in Appendix A, there are no other components of the Project that would have the potential to impact emergency access and impacts would be less than significant. Implementation of the Safety Element may help improve emergency access given the policies and programs described previously.



18. Tribal Cultural Resources

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|-------------------------------------|--------------------------|
| Would the project: | | | | |
| Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: | | | | |
| a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| a) <i>Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?</i> | | | | |

Less Than Significant. The Project does not include any specific development designs or proposals, nor does it grant any entitlements for development. Also, if any historic or pre-historic artifact is discovered on the site during any future development, work shall immediately stop until a qualified professional archaeologist view the site, provides recommendations, and gives clearance to continue, per General Plan program OCEI-20. General Plan policies OCEP-36 and OCEG-9 further protect historic resources by requiring archeological surveys when applicable. Impacts from the Project would be less than significant.

b) *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

Less Than Significant. Paradise lies within territory formerly inhabited by the Northwestern Maidu or Konkow peoples. Major villages were located atop the crests of ridges high above the

rivers.¹⁵ Given the potential for tribal cultural resources in the vicinity, and pursuant to State law, written notices about the Project were sent to the following tribes: United Auburn Indian Community of the Auburn Rancheria, Mooretown Rancheria, Mechoopda Indian Tribe, Greenville Rancheria, Berry Creek Rancheria, Enterprise Rancheria, Washoe Tribe of Nevada and California, and Konkow Valley Band of Maidu (Tribes). Pursuant to AB 52 and SB 18 and according to Government Code Section 65352.3, the tribes were provided information on the Project and invited to consultation. The United Auburn Indian Community of the Auburn Rancheria responded to confirm that the Project site is outside of its geographic area of traditional and cultural affiliations. The Berry Creek Rancheria tribe requested a consultation related to the sewer system and the corresponding Sewer Service Overlay Zone, and consultation occurred between the tribe and the Town's engineering department (the lead agency for the Town's sewer project). The sewer project is a separate effort for this Project and currently undergoing its own environmental review. Upon further conversations with the tribe, the Berry Creek Rancheria shared that they did not have concerns with the Project, which is related to making land available for rebuilding and new construction of housing. Consistent with Government Code 21080.3.2, tribal consultation is considered concluded given the tribe's input that no significant effect exists.

The Project does not include any specific development designs or proposals, nor does it grant any entitlements for development. Also, if any archaeological or cultural resource is discovered on the site during any future development work shall immediately stop, as described above. Tribes did not indicate that implementation of the Project would result in impacts and impacts are therefore considered less than significant.

¹⁵ Town of Paradise, 1994. Paradise General Plan Environmental Setting Document.

19. Utilities and Service Systems

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| Would the project: | | | | |
| a. Require or result in the construction of new water or wastewater treatment facilities or storm water drainage, electric power, natural gas, or telecommunication facilities the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <i>a-c) Require or result in the construction of new water or wastewater treatment facilities or storm water drainage, electric power, natural gas, or telecommunication facilities the construction of which could cause significant environmental effects? Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?</i> | | | | |

Less Than Significant. The Paradise Irrigation District (PID) provides water to most areas of the Town of Paradise. The primary source of water supply is surface water from rainfall stored in two reservoirs, Paradise Reservoir and Magalia Reservoir. The upstream reservoir, Paradise Lake, is the main storage facility with a total storage capacity of approximately 11,500 AF. Surface water from Paradise Lake is released into Little Butte Creek and flows to Magalia Reservoir. Magalia Dam is currently restricted to 800 AF of storage as a result of the current maximum water surface elevation dictated by the Department of Water Resources, Division of Safety of Dams (DSOD). PID’s water distribution network sustained substantial damage during the Camp

Fire. According to the 2020 PID Urban Water Management Plan, to date, PID continues to repair or replace main segments that sustained leak damage or have remained off with an outlook of several years before all breaks can be addressed.

Paradise relies upon annual precipitation and runoff in the Butte Creek watershed. Depending upon trends in climate change, annual precipitation and snowpack conditions, Paradise may experience shortage in the future. However, through the PID planning horizon of 2045, there is no anticipated shortage of supply in any year type. This is partially due to the reduction in demand caused by the 2018 Camp Fire. As Paradise continues to rebuild following the disaster, trends in redevelopment and possible intensification may change the outlook of water supply through 2045. It is difficult to predict development trends after such an unprecedented community change. PID's projections are based on data from the Town, which estimates a return to pre-fire population by 2045. The approximately 26,500 people projected to live in Paradise by 2045 is well within the 7,179 housing units for which the Project plans. Using an average of 2.19 person/household,¹⁶ the Project plans for approximately 15,720 people (7,179 housing units) through 2030. This number is within the anticipated capacity of the PID, which anticipates a Paradise population of 18,955 in 2030. In addition, the Project includes policies to require drought-resistant landscaping (SP-51) and future development would be required to comply with Title 24 requirements that reduce water usage.

Possible construction of the sites identified in the Project to satisfy the RHNA would not result in the construction of new or expanded utility or service systems. Electricity is available to all of the sites identified to satisfy the RHNA. Because Paradise does not have a wastewater treatment facility, new development would not affect the ability to provide service to a treatment facility. At this time, all new residential development is required to provide its own wastewater treatment facilities in accordance with the Town's wastewater regulations. The Project does include a program (HI-1) to continue planning for a sewer system and Program HI-5 would create a zoning overlay to allowed increased densities in the SSA. The Paradise Sewer Project is undergoing its own CEQA review (an EIR began in fall 2020) and the Project under review in this CEQA document does not propose to construct, nor does it require the construction of, such a sewer system. Should the Sewer Project not end up being implementing, the Town would still have ample land capacity to accommodate its RHNA at the densities of 15 unit/acre currently allowed with clustered wastewater systems.

Additionally, future residential development projects would comply with General Plan policies related to utilities. Future development proposals would be reviewed by the appropriate service agencies as part of the development application review process in order to ensure that sufficient capacity in all utilities would be available on time to maintain desired service levels. Therefore, Project implementation would have a less-than-significant impact regarding a significant increase in demand for wastewater and water services, electric power, natural gas, or telecommunication facilities.

¹⁶ Paradise Irrigation District, 2021. Urban Water Management Plan. June.

- d) *Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

Less Than Significant. Solid waste generation in the town is primarily disposed of at the Neal Road Recycling and Waste Facility (NRRWF), which is owned and operated by Butte County. According to Butte County Department of Public Works, the maximum amount accepted daily at the NRRWF is 1,500 tons, although the daily amount rarely exceeds 1,200 tons. However, due to the 2018 Camp Fire, Butte County Public Works submitted an Emergency Waiver of Standards to CalRecycle to increase the maximum tonnage from 1,500 tons per day to 15,000 tons per day, as well as increased permitted traffic volume, transfer and processing capacity, and facility operating hours to expedite disposal of fire debris. The NRRWF has a permitted capacity of approximately 25.3 million cubic yards and a remaining capacity of 20.8 million cubic yards. The facility is estimated to operate until 2048, accommodating 2.5 to 3.5 percent annual increases in solid waste due to anticipated growth in the County.¹⁷ Future development under the Project would be within this capacity, and within the pre-Camp Fire population included in the Franchise Agreement between the County and waste management and collection services through February 2030; the Project would not result in the need for additional NRRWF staff and no impacts are expected from the Project.¹⁸ The Butte County Department of Public Works is in development of a Master Plan and any future facility expansion would be driven by the Master Plan's recommendations. Impacts from the Project would be less than significant.

- c) *Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

Less Than Significant. As mentioned above, solid waste collection and disposal for residential units would be disposed of at the NRRWF. The NRRWF operates in compliance with federal, State, regional, and local governmental statutes, and regulations. The Project would not impede the NRRWF's ability to be in compliance with applicable regulations. In addition, the program SI-7 of the Project intends to facilitate waste reduction in the town, with an emphasis on hazardous waste. Impacts from the Project would be less than significant.

¹⁷ Butte County Department of Public Works, 2021. Negative Declaration Neal Road Recycling and Waste Facility Composting Project. Prepared by Dudek. March.

¹⁸ Cissell, Craig, Deputy Director, Waste Management Division, Butte County Public Works. 2021. Personal communication with Urban Planning Partners. December 6.

20. Wildfire

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|-------------------------------------|--------------------------|
| Would the project: | | | | |
| a. Substantially impair an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability or drainage changes? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a) *Substantially impair an adopted emergency response plan or emergency evacuation plan?*

Less Than Significant. The Town’s TMP includes a high-level capacity analysis to determine major and secondary evacuation routes, potential areas of congestion (intersections or roadway segments), and opportunities for roadway extensions/connections on dead-end streets for additional routes and increased evacuation capacity. The TMP is scheduled for review and consideration of adoption by the Town on May 10, 2022.

The Project builds off the ongoing TMP efforts by including programs and policies to implement upgrades recommended in the TMP (SI-11, SI-19); clustering development and critical services in areas near evacuation routes and discouraging development with poor evacuation access (SP-5, SP-30, SP-41); and providing education on emergency response and evacuation plans (SI-16), including evacuation simulations (SP-43, SI-19). In addition to increased density in the SSA, the Town would explore incentives such as reduced permit fees, expedited processing, a special permitting desk, CEQA streamlining, and/or density bonus programs for development in these safer areas (SI-3). Development in areas that is not as well-served by evacuation routes would be disincentivized through an impact fee or overlay zone (SP-46) and the Town would prohibit any increase of existing residential density on parcels that are served access by either an existing or resultant cul-de-sac exceeding a maximum length of 1,800 lineal feet (SI-19). Similarly, development of critical facilities in wildfire risk reduction buffers would be prohibited (SI-13).

For these reasons, the Project would not impair evacuation planning and would instead work in tandem with ongoing efforts to improve emergency response and evacuation. Impacts from the Project would be less than significant.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less Than Significant. Wildland fire hazards exist in varying degrees over approximately 70 percent of Butte County. The highest wildfire risk to human health and safety occurs in the foothill communities, including in Paradise. This area is considered a wildland-urban interface (WUI). Fires that occur in the WUI affect natural resources as well as life and property. During the past decade, Butte County has experienced several large and damaging wildfires in and around the wildland-urban interface areas, including Paradise. In November 2018, Paradise and some surrounding areas in Butte County faced the Camp Fire, which resulted in the loss of 85 lives, nearly 19,000 structures, the burning of more than 150,000 acres over two weeks, and \$9 billion in insurance claims. It took less than six hours for the Camp Fire to destroy over 90 percent of Paradise. The vast majority of the town is identified by CAL FIRE as a very high fire hazard severity zone (VHFHSZ).

The Project identifies parcels throughout the town as locations for potential future residential development to accommodate the RHNA, including sites that are in the VHFHSZ. Future development would expose people or structures to wildland fire risk. However, the Project includes policies and programs to reduce fire risk, including but not limited to the creation of Wildfire Risk Reduction Buffers, the clustering of development in the SSA where it is flatter and easier to evacuate, establishment and enforcement of fuels management programs and education, analysis and potential implementation of more stringent fire-resistant building requirements, and implementation of community-wide evacuation drills. Such policies and programs, which future developments would be required to implement, would reduce the risk of loss, injury, or death due to wildfire rather than exacerbate the existing wildfire risk.

As discussed above, the Project is a policy-level document that does not propose any specific development designs or proposals, nor does it grant any entitlements for development. Potential wildland fire impacts to subsequent development projects would also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Future development in the WUI would also be subject to applicable California Building Code and Board of Forestry requirements for development in the VHFHSZ. For these reasons, this impact is considered less than significant.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Less Than Significant. The Project is a series of policy-level documents that seek to facilitate the construction and conservation of housing to meet Paradise's housing needs and reduce

exposure to hazards. The Project does include policies and programs to improve the Town's infrastructure, such as improvements to emergency evacuation routes, installation of an early warning systems, and implementation of a sewer system. However, these suggested infrastructure improvements are in tandem with independent projects that the Town is heading separately from the Housing and Safety Element updates (e.g., Transportation Master Plan, Paradise Sewer Project) and such projects are subject to their own CEQA review. Furthermore, the infrastructure projects identified in the Project would improve wildfire risk and response.

d) *Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability or drainage changes?*

Less Than Significant. The Project identifies sites for future potential housing development and encourages a range of housing types at varying affordability levels. The Town has adequate vacant land that was previously developed and destroyed in the Camp Fire to accommodate its RHNA. If development of housing were to occur in previously undeveloped areas, increased impervious surfaces and grading and vegetation removal activities could increase surface runoff and potentially contribute to the potential for localized flooding and/or erosion. However, the sites identified for development are not greenfield development.

Paradise does not have any designated flood hazard areas as depicted on the Federal Emergency Management Agency (FEMA) Digital Flood Insurance Rate Map (DFIRM). Any flooding that occurs is localized in nature, resulting from a temporary lack of capacity or blockage of a drainage basin. According to the Butte County Local Hazard Mitigation Plan, dam failure is unlikely in Paradise and limited in severity. The Paradise Dam north of the town is considered an Extremely High Hazard dam for inundation, but the inundation area is completely outside of the Town limits. Furthermore, the Project includes policies and programs to reduce the risks related to localized flooding (e.g., SI-6, SP-27).

The majority of Paradise is at a low to moderate risk of landslide. The areas surrounding the town are where the topography most dramatically changes and are at greater risk to landslide. The northern edge of town and pockets in the southern and western edges are at moderate risk and the Town limits on the east abut and at times overlap an area of high potential landslide risk.

The Project includes policies and programs designed to facilitate the construction and conservation of housing, which could increase exposure of people and structures to landslides. The Project includes policies to facilitate clustering development in the SSA, which is primarily contained within the area of low landslide risk. The Safety Element also includes policies and programs to minimize risk and vulnerability of the community to hazards and reduce damages. The Town also has policies to prohibit development on steep slopes where landslide and ground failure are a greater concern; development on slopes exceeding 20 percent are required to submit erosion control plans and slope stabilization programs. Development is prohibited on slopes exceeding 30 percent. Consistency with local and State policies, including the California Building Code, would ensure future development under the Project is designed to reduce landslide risks.

The Project, which is at the policy level, would have less than significant impacts related to exposure to landslides or floods from fires or runoff.

21. Mandatory Findings of Significance

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number, or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| a) <i>Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?</i> | | | | |

Less Than Significant. The Project does not include any specific development designs or proposals, nor does it grant any entitlements for development. Development of the sites identified to satisfy the RHNA would not impact or degrade the quality of the environment as these sites are all located in areas that were already developed pre-fire and/or subdivided and are infill lots. Future development under the Project would be consistent with State and local policies that protect special status species and cultural resources.

b) *Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are*

considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Less Than Significant. The Project does not include any specific development designs or proposals, nor does it grant any entitlements for development. Development of the sites identified to satisfy the RHNA would not have impacts that are individually limited, but cumulatively considerable. Development under the Project would be incremental over the eight-year planning period, and so potential impacts would not occur all at once.

c) *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

Less Than Significant. The Project is at the policy level and encourages the provision of a range of housing types and affordability levels. The Project does not include any specific development designs or proposals, nor does it grant any entitlements for development. Development of the sites identified to satisfy the RHNA would not have environmental effects which will cause substantial adverse effects on human beings either directly or indirectly. The proposed Housing Element could, instead, have positive impacts resulting from additional housing opportunities for the citizens of Paradise, and the proposed Safety Element could have positive impacts on the well-being and safety of the people and property of Paradise.

IV. LIST OF PREPARERS

Town of Paradise

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Prime Consultant

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Leslie Carmichael, Principal Planner

Meredith Rupp, Senior Planner

Alyssa Chung, Planner

Tabitha Tolsma, Assistant Planner

Additional Project Consultants

Transportation

W-Trans

Kittleson & Associates

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APPENDIX A

Technical Memorandum

April 15, 2022

Project# 26067

To: Meredith Rupp, Lynette Dias (Urban Planning Partners)
From: Mike Alston, Mike Aronson, Mike Alston (Kittelison & Associates, Inc.)
RE: Town of Paradise Housing Element DRAFT Transportation Analysis Memo

INTRODUCTION

This memorandum presents the findings of the transportation impact analysis conducted for the Paradise Housing Element and Safety Element (herein referred to as the “project”). The proposed project will establish the proposed future zoning and planned housing development for the 14,700-acre Town of Paradise (“Town”) planning area.

The potential effects of the Housing Element component are the primary focus of this analysis, as its implementation has the potential to impact physical conditions related to transportation. The Housing Element provides a blueprint to develop up to 7,179 dwelling units (DUs) town wide, with 6,837 of those units being replacement DUs for those lost in the fire, and with an expectation that up to 3,075 DUs would be constructed by 2030. The Safety Element component of the project provides a framework of policies related to increasing resiliency against disasters and minimizing risk to hazards. Such policies will not directly impact transportation and indirect impacts will be minimal.

EXISTING CONDITIONS

The Paradise planning area encompasses 14,700 acres (see Figure 1). Land use is dominated by residential and commercial uses with a limited number of industrial activities. Constraints on development include a shortage of flat, developable land, poor soils for septic tank use, and potential water supply limitations.

Paradise can be considered low density and/or rural, which has a direct impact on transportation and mobility. There are limited options for using public transit, and in many areas, it is physically difficult to walk or bike between destinations due to limitations in the pedestrian and bicycle network such as lack of sidewalks and bicycle lanes. As a result, most people drive to their destinations.

After the 2018 Camp Fire, traffic in the impacted community decreased, while traffic levels in the primary surrounding communities increased. Weekday activity between the areas impacted by the fire and neighboring areas increased due to contractors, supplies, and people commuting to temporary housing and jobs.

A description of the existing roadway, transit, bicycle, and pedestrian components of the transportation system within the Town of Paradise is provided in the following sections.

Roadway Network

The existing roadway network in the Town of Paradise is composed of a street system made up of primarily arterials and collector roads. The roadway network is also shown graphically in Figure 2. Roadway classifications provided are from the 1994 Town of Paradise General Plan.

- **Principal Arterials:** Principal arterials are generally forty to sixty-four feet in width with eighty feet of right-of-way. The primary function of principal arterials is to expedite through traffic to major traffic generators. The generators include central business districts, community shopping centers and traffic between communities and/or between freeways and “lower” arterial systems.
- **Minor arterials:** Minor arterials service inter-community traffic trips between neighborhoods or trips between a neighborhood and a higher arterial. They are normally twenty-eight to forty feet wide on sixty-foot rights-of-way.
- **Collectors:** Collectors provide some through traffic movement, carry local traffic within the local area (neighborhood), and primarily provide access to abutting land and to higher roadway classifications (minor or principal arterials). They primarily serve local traffic of a neighborhood or a commercial/industrial area.
- **Access Streets:** Access streets are designed to serve traffic that is destined for and originating from abutting land. The adjacent land is most often residential, but access streets also serve industrial and commercial areas. The Town of Paradise utilizes a great number of private streets as local streets.

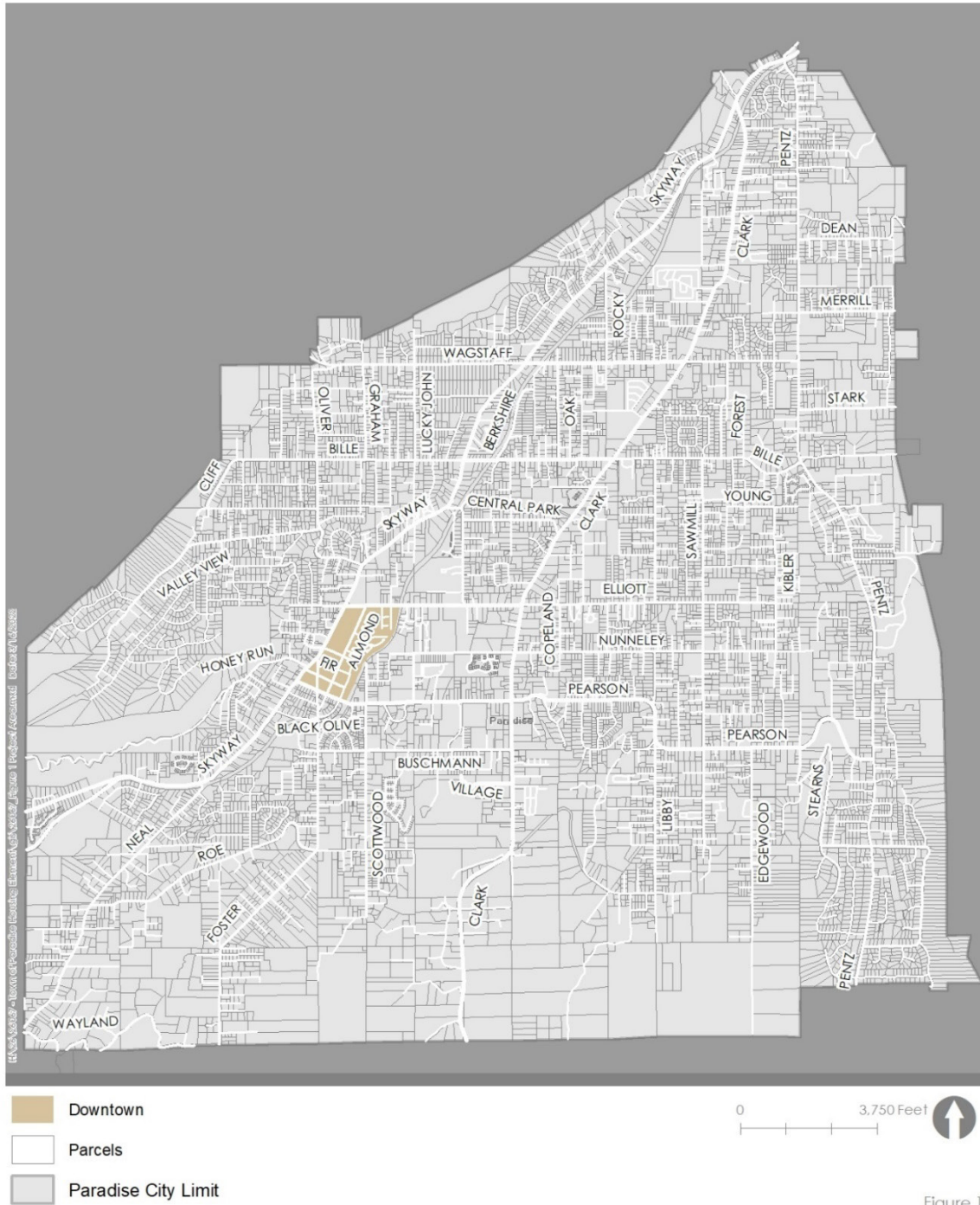


Figure 1



Paradise Housing Element Project Area

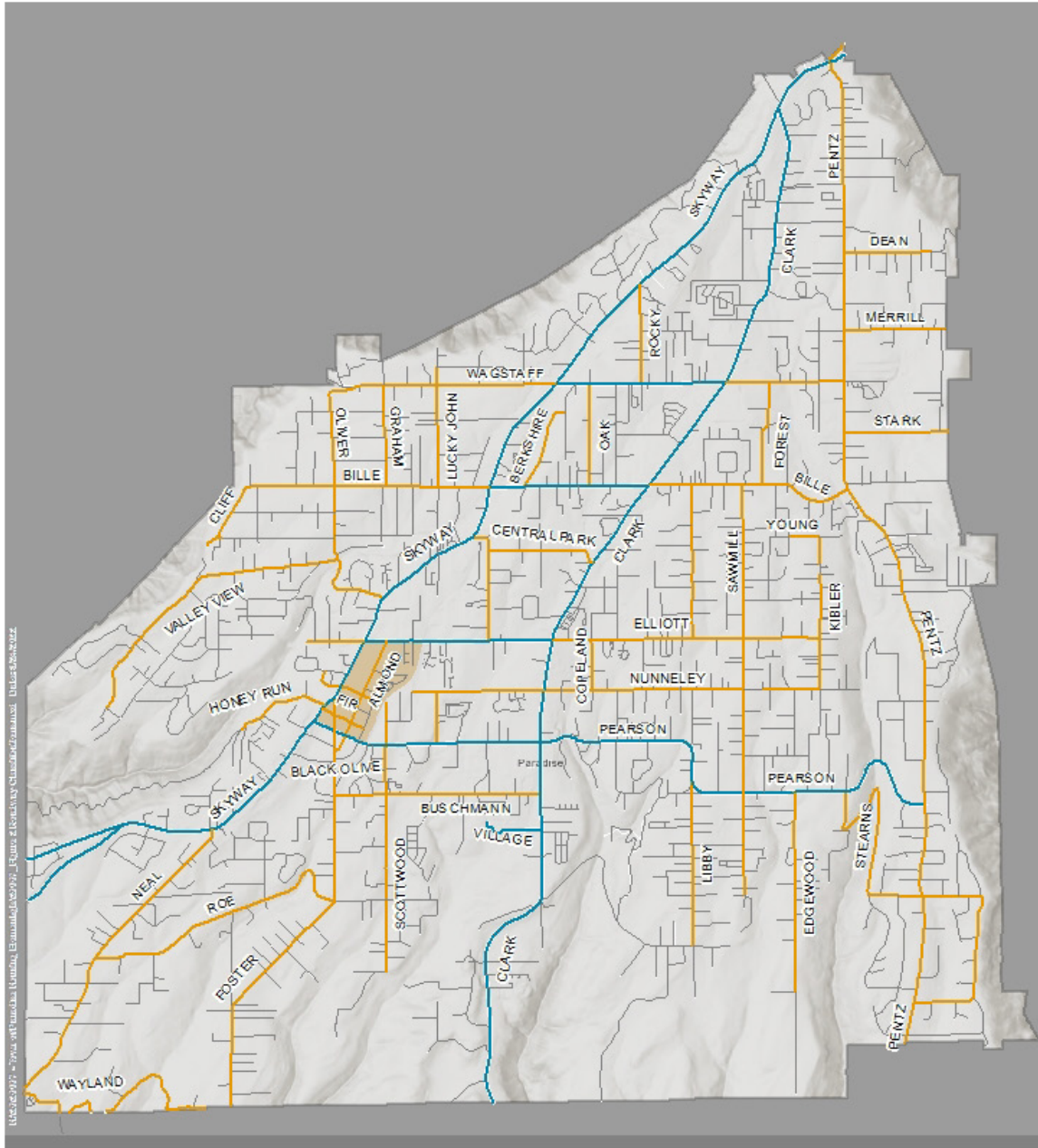


Figure 2



**Paradise Housing Element
 Transportation Analysis Memo**

Transit Facilities

The Town of Paradise is primarily served by the B-Line (Butte Regional Transit), which is Butte County's regional public transit system. Residents can use B-Line to travel locally in and between Chico, Oroville, Paradise, or communities throughout Butte County.

B-LINE

The B-Line operates three main routes in Paradise that directly serve the area through nearby street-side bus stops. These routes run locally and are meant to connect the residents of Paradise to nearby job centers and communities in Chico, Oroville, and Magalia. They are summarized in Table 1.

Table 1: Bus Routes Serving the Area

| Route | Description | Day | Operating Times | | Frequency |
|-------|---|----------|-----------------|---------|-----------------|
| 31 | Southbound direction starts at Almond & Birch in Paradise and ends at Mitchell & Spencer in Oroville | Weekday | 6:45 AM | 5:56 PM | One bus per day |
| 40 | Westbound direction starts at Almond & Birch in Paradise and ends at the Transit Center on 2nd & Salem in Chico | Weekday | 6:00 AM | 7:26 PM | Every 2 hours |
| | | Saturday | 7:50 AM | 7:03 PM | Every 2 hours |
| | | Sunday | 9:50 AM | 6:00 PM | Every 2 hours |
| 41 | Westbound direction starts at Skyway & Colter in Magalia, travels through Paradise along Skyway to Almond & Birch, and ends at the Transit Center on 2nd & Salem in Chico | Weekday | 5:50 AM | 6:53 PM | Every 2 hours |
| | | Saturday | 9:45 AM | 6:03 PM | Every 3 hours |

Bicycle and Pedestrian Facilities

Bicycle and pedestrian facilities are important components of a transportation network. They offer non-vehicular opportunities for commute and recreational trips and provide connections to the region's transit network.

BICYCLE FACILITIES

Bicycle facilities are defined by the following four classes¹:

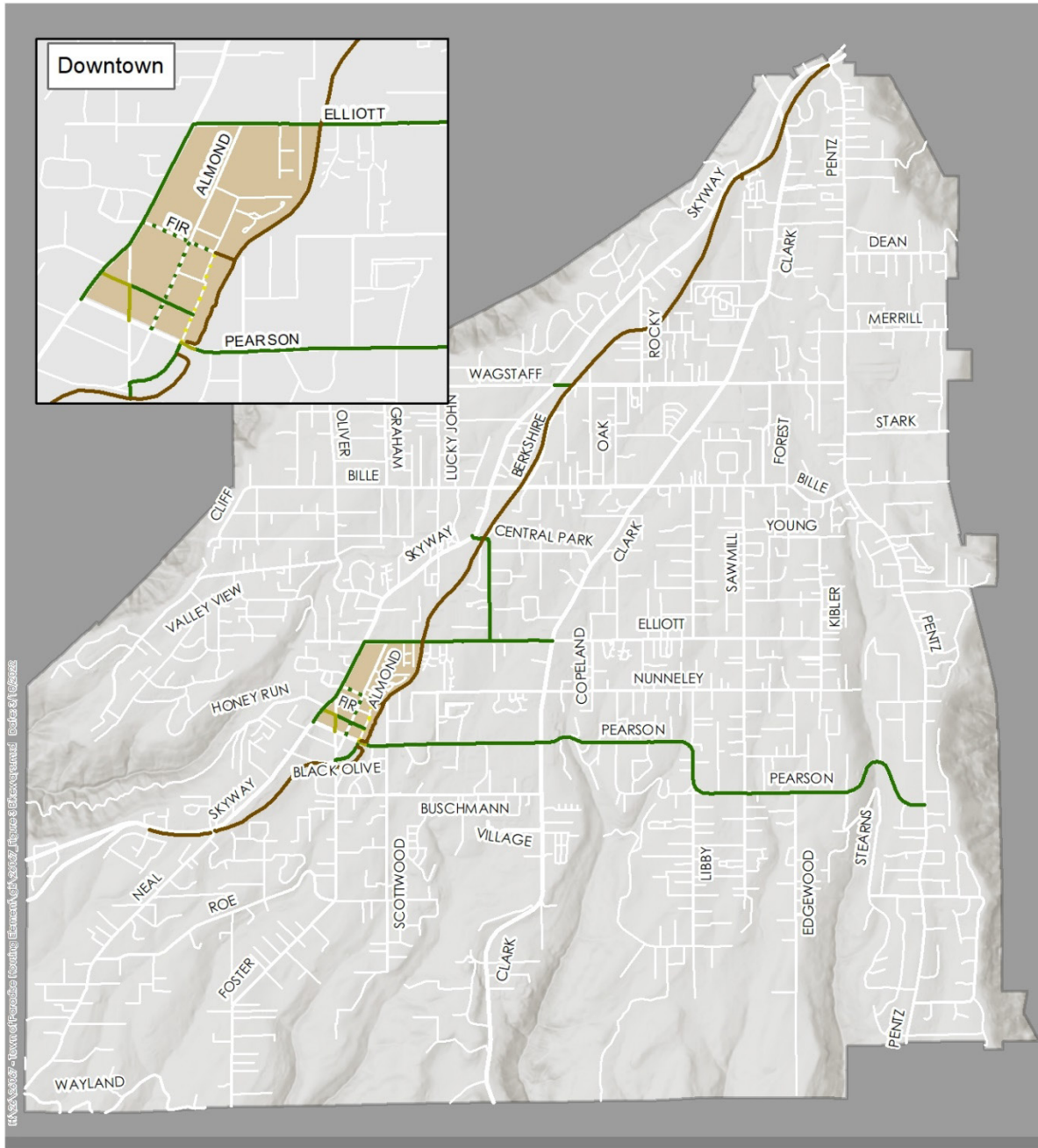
- **Class I** – Provides a completely separated facility designed for the exclusive use of bicyclists and pedestrians with crossing points minimized.
- **Class II** – Provides a restricted right-of-way designated lane for the exclusive or semi-exclusive use of bicycles with through travel by motor vehicles or pedestrians prohibited, but with vehicle parking and crossflows by pedestrians and motorists permitted.
- **Class III** – Provides a right-of-way designated by signs or permanent markings and shared with pedestrians and motorists.
- **Class IV** – Provides a restricted right-of-way designated lane for the exclusive use of bicyclists that is separated by a vertical element to provide further separation from motor vehicle traffic.

Figure 3 displays existing and planned bikeways.

PEDESTRIAN FACILITIES

There are limited pedestrian facilities in Paradise. The Yellowstone Kelly Heritage Trailway traverses through the town as a recreational path for families, joggers, hikers, and bikers alike. Sidewalks are present intermittently along some major roadways. Crosswalks are present intermittently at signalized and unsignalized intersections.

¹ As detailed in Chapter 1000 of the Highway Design Manual (Caltrans, 2015).



Existing **Planned**

— Class II Bike Lane - - - - Class II Bike Lane

— Class III Bike Route - - - - Class III Bike Route

— Class I Trail

■ Downtown 0 3,750 Feet

■ Paradise City Limit

↑

Figure 3



**Paradise Housing Element
 Existing and Planned Bikeways**

Vehicle Miles Traveled

Daily vehicle miles traveled (VMT) is a measure used to capture the relationship between land use and transportation and its effect on greenhouse gas emissions, since vehicle miles traveled is typically directly related to emissions. VMT is discussed in the Regulatory Setting section.

The BCAG travel demand model was referenced to assess the baseline and future year average household VMT per resident for the transportation analysis zones (TAZs) that comprise the Paradise planning area and Butte County. The BCAG Post-Camp Fire Model Update (Version 1.2) was used. Relevant to the Housing Element, the model outputs include regional household VMT per resident averages, which are shown for the County and the Town in Table 2.

Table 2: BCAG Travel Demand Model Daily Home-Based VMT per Resident

| Planning Area | Model Year 2020 | Model Year 2045 |
|----------------------|-----------------|-----------------|
| Butte County Average | 11.6 | 12.3 |
| Paradise | 15.8 | 17.5 |

Source: BCAG

As Table 2 demonstrates, the average VMT per resident in Paradise is 36 to 42 percent higher than the county average in baseline and future year conditions, respectively. Figure 4 and Figure 5 show the low-VMT TAZs (at least 15 percent below Butte County average) within Paradise in the Model Year 2020 and 2045 (depicted as light blue polygons). Overall, a small portion of the Town is considered “low VMT,” and most of the developable area is considered a “high VMT” area in comparison with countywide averages.

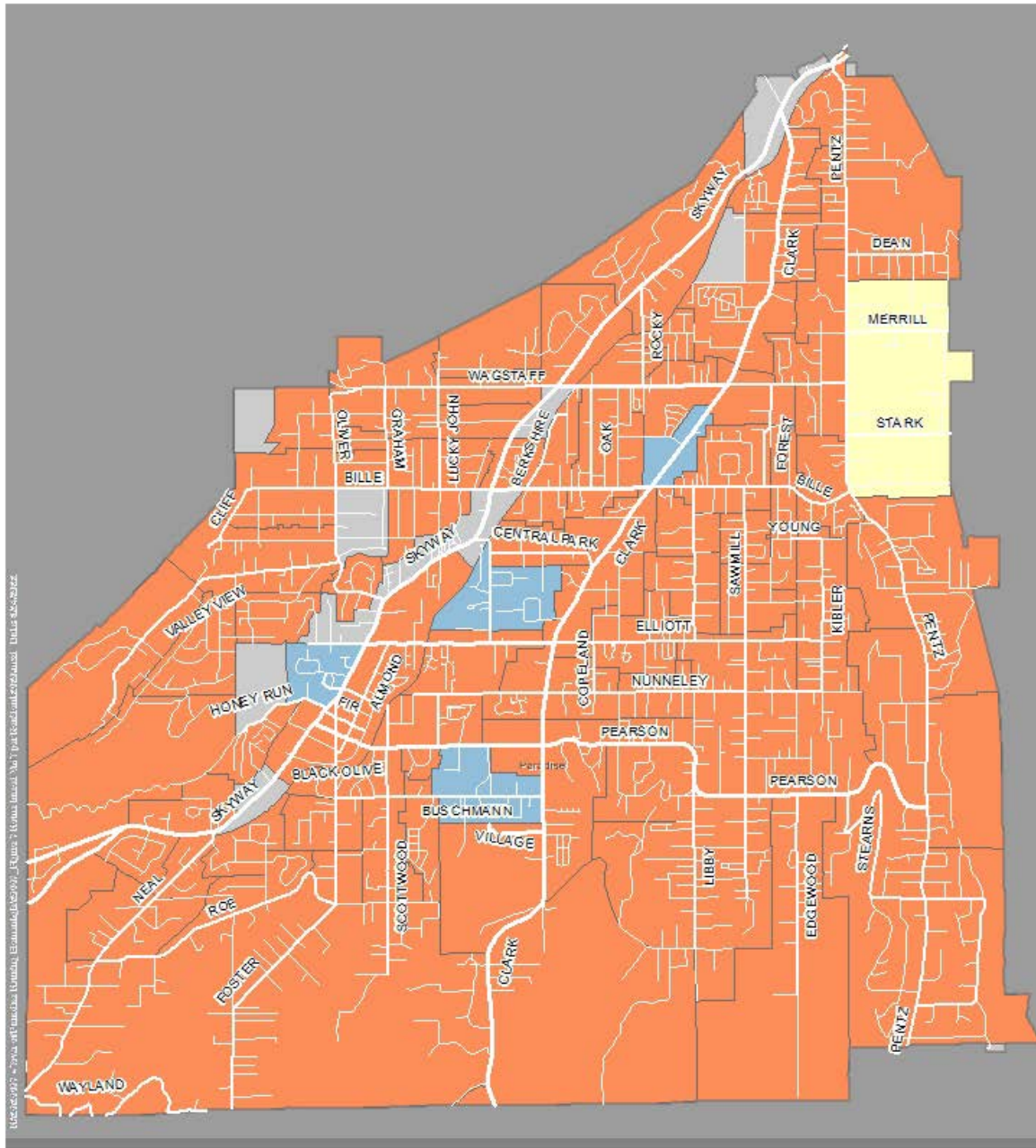
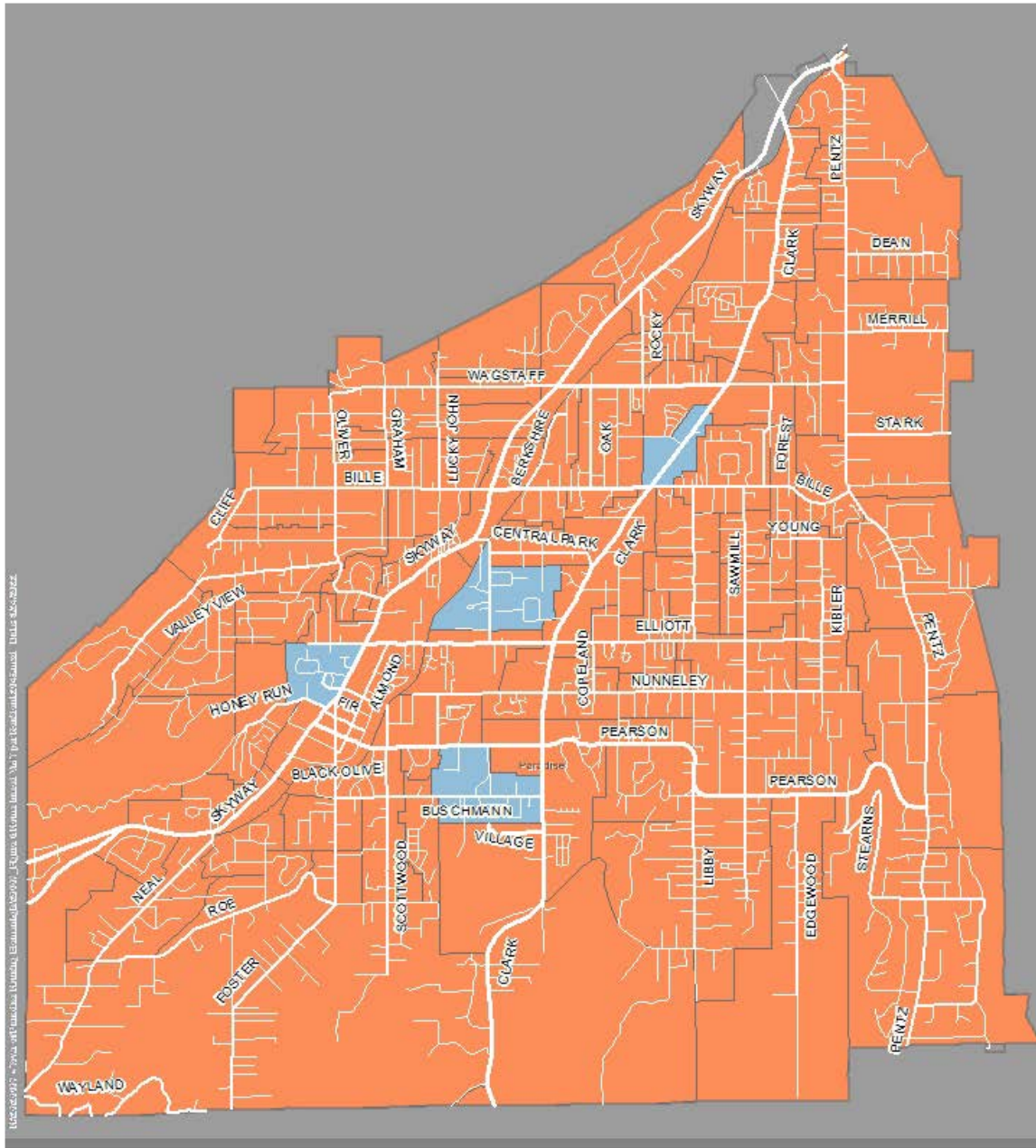


Figure 4



**Paradise Housing Element
 Home-Based VMT per Resident, 2020**



Home-Based VMT per Resident 2045 Paradise City Limit

- <85% Regional Average
- 85-100% Regional Average
- >100% Regional Average



Figure 5



Paradise Housing Element Home-Based VMT per Resident, 2045

REGULATORY SETTING

This section summarizes applicable federal, state, regional, and local plans, laws, and regulations that are relevant to this analysis. This information provides a context for the discussion related to the project's consistency with applicable policies, plans, laws, and regulations.

Federal

No federal plans, policies, regulations, or laws pertaining to transportation have been determined to be applicable to this project.

State

SENATE BILL 743

Senate Bill 743 (SB 743) was signed into law in September 2013. Senate Bill 743 (Steinberg, 2013) required changes to the CEQA Guidelines regarding the analysis of transportation impacts. Historically, CEQA transportation analyses of individual projects determined impacts in the circulation system in terms of roadway delay and/or capacity at specific locations. SB 743 changes include the elimination of auto delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts. Those proposed changes identify vehicle miles traveled (VMT) as the most appropriate metric to evaluate a project's transportation impacts. Since the bill has gone into effect, automobile delay, as measured by "level of service" and other similar metrics, no longer constitutes a significant environmental effect under CEQA. Auto-mobility (often expressed as "level of service") may continue to be a measure for planning purposes.²

In December 2018, the California Governor's Office of Planning and Research (OPR) and the State Natural Resources Agency submitted updated CEQA Guidelines to the Office of Administrative Law for final approval to implement SB 743. The Office of Administrative Law approved the updated CEQA Guidelines, thus implementing SB 743 and making VMT the primary metric used to analyze transportation impacts. The final text, final statement of reasons, and related materials are posted at <http://resources.ca.gov/ceqa>. The changes have been approved by the Office of the Administrative Law and are now in effect. For land use and transportation projects, SB 743-compliant CEQA analysis became mandatory on July 1, 2020.

² Governor's Office of Planning and Research, 2016. Technical Advisory on Evaluating Transportation Impacts in CEQA, Implementing Senate Bill 743 (Steinberg, 2013)

Regional

BUTTE COUNTY ASSOCIATION OF GOVERNMENTS

The Butte County Association of Governments (BCAG) is the federally designated Metropolitan Planning Organization (MPO) and the state designated Regional Transportation Planning Agency for Butte County. BCAG has a 10-member Board of Directors, including each of the five Butte County Supervisors and one council person from each of the five incorporated cities/town (Biggs, Chico, Gridley, Oroville, and Paradise).

6th Cycle Regional Housing Needs Plan

BCAG issued the Regional Housing Needs Allocation (RHNA) for all the jurisdictions in Butte County in its Regional Housing Needs Plan in December 2020. The allocations took into consideration the 15 factors mandated in Government Code Section 65584.04(e), including the distribution of household growth in the Regional Transportation Plan (RTP), described below, and opportunities to maximize use of transit and existing transportation infrastructure. The allocation methodology also considered the lost housing units in the Camp Fire and allocated fire rebuild units to Paradise and the Unincorporated County based on actual unit loss. The fire rebuild allocation represent 60 percent of the housing units destroyed in the Camp Fire.

Table 3 shows Paradise’s RHNA across the four income categories.

Table 3: RHNA Allocations by Income Category, Town of Paradise

| Income Level | Regular Growth | Fire Rebuild | Total |
|---------------------------------------|----------------|--------------|-------|
| Very Low Income (0-50% AMI) | 73 | 310 | 383 |
| Low Income (51-80% AMI) | 64 | 310 | 374 |
| Moderate Income (81-120% AMI) | 32 | 1,287 | 1,319 |
| Above Moderate Income (over 120% AMI) | 173 | 4,930 | 5,103 |
| Total | 342 | 6,837 | 7,179 |

Regional Transportation Plan/Sustainable Communities Strategy

As the Regional Transportation Planning Agency, BCAG published the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) in 2020 (adopted December 10, 2020)³. BCAG also prepared and certified the 2020 Regional Transportation Plan/Sustainable Communities Strategy Supplemental Environmental Impact Report (RTP/SCS SEIR)⁴ and adopted a Statement of Overriding Consideration for the significant and unavoidable impacts. The RTP/SCS is a planning document that specifies the policies, projects, and programs necessary over a 20 or more-year period to maintain, manage, and improve the region's transportation system. The RTP/SCS includes an Air Quality Conformity Analysis and a Program Environmental Impact Report (RTP/SCS EIR). The RTP/SCS is updated every four years.

During the 2020 RTP/SCS development, the 2018 Camp Fire in Butte County destroyed approximately 153,000 acres of property, 13,972 residences, 528 commercial buildings, and 4,293 other structures. It resulted in 85 fatalities. BCAG is responsible for developing and maintaining a regional travel model that includes estimates and projections of population, housing, land use, and travel through the RTP/SCS. The Camp Fire disrupted any ability to accurately forecast these items for the 2020 RTP/SCS. Therefore, BCAG chose to use the "best available" data at the time to complete the 2020 RTP/SCS and commission a "Post-Camp Fire Regional Population & Transportation Study" to analyze the related effects of the Camp Fire and inform the subsequent 2024 RTP/SCS.

The RTP/SCS included studying a "medium growth" scenario which included the forecasts for Paradise shown in Table 4. This forecast growth exceeds the growth associated with the project; therefore, the project's effects are consistent with the findings analyzed in the RTP/SCS.

³ 2020 *Regional Transportation Plan/Sustainable Communities Strategy, 2020-2040*. Butte County Association of Governments. December 10, 2020. <http://www.bcag.org/Planning/RTP--SCS/index.html>. Accessed January 21, 2022.

⁴ 2020 *Regional Transportation Plan/Sustainable Communities Strategy. Draft Supplemental Environmental Impact Report*. Rincon Consultants. October 2020, certified December 10, 2020. Note that a Response to Comments Document or Final EIR was not prepared as no comments were submitted on the Draft SEIR. http://www.bcag.org/documents/planning/RTP%20SCS/2020%20RTP%20SCS/SEIR/_2020%20RTP%20-%20SCS%20SEIR.pdf. Accessed January 21, 2022.

Table 4: Housing Forecasts - Total Dwelling Units 2018-2040

| Jurisdiction | 2018 | 2020 | 2025 | 2030 | 2035 | 2040 | Total Increase 2018-2040 | Percent Increase 2018-2040 |
|--------------|--------|-------|-------|-------|--------|--------|--------------------------|----------------------------|
| Paradise | 13,091 | 1,916 | 6,490 | 9,318 | 10,811 | 11,347 | -1,744 | -13% |

Note: 2018 dwelling unit count obtained from State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties, and the State, 2010-2019, with 2010 Benchmark. Sacramento, California, May 2019.

Sources: BCAG RTP/SCS

The RTP/SCS concluded that implementation of its proposed transportation improvements has the potential to interfere with achievement of VMT reductions set forth in the California Air Resource Board’s 2017 Scoping Plan; therefore, RTP/SCS impacts related to VMT would be significant and unavoidable. The RTP/SCS proposes mitigation measures that must be collaboratively developed and implemented with local agencies to achieve further VMT reductions. These include the following:

Local-Level

- Increase diversity of land uses.** This strategy focuses on the inclusion of mixed uses within projects or in consideration of the surrounding area to minimize vehicle travel in terms of both the number of trips and the length of those trips.
- Provide pedestrian network improvements.** This strategy focuses on creating a pedestrian network within the project and connecting to nearby destinations. Projects in Butte County tend to be small, so the emphasis of this strategy would likely be the construction of network improvements that connect the project site directly to nearby destinations. Alternatively, implementation could occur through an impact fee program or benefit/assessment district targeted to various areas in the county designated for improvements through local or regional plan. Implementation of this strategy may require regional or local agency coordination and may not be applicable for all individual land use development projects.
- Provide traffic calming measures and low-stress bicycle network improvements.** This strategy combines the California Air Pollution Control Officers Association (CAPCOA) research focused on traffic calming with new research on providing a low-stress bicycle network. Traffic calming creates networks with low vehicle speeds and volumes that are more conducive to walking and bicycling. Building a low-stress bicycle network produces a similar outcome. Implementation options are similar to strategy 2 above. One potential change in this strategy over time is that e-bikes (and e-scooters) could extend the effective range of travel on the bicycle network, which could enhance the effectiveness of this strategy.
- Implement car-sharing program.** This strategy reduces the need to own a vehicle or reduces the number of vehicles owned by a household by making it convenient to access a shared vehicle for those trips where vehicle use is essential. Note that implementation of this strategy would require regional or local agency implementation

and coordination and would not likely be applicable for individual development projects.

5. **Increase transit service frequency and speed.** This strategy focuses on improving transit service convenience and travel time competitiveness with driving. Given land use density in Butte County, this strategy may be limited to traditional commuter transit where trips can be pooled at the start and end locations or require new forms of demand-responsive transit service. The demand-responsive service could be provided as subsidized trips by contracting to private Transportation Network Companies (TNCs, such as Uber, Lyft, and Via) or taxi companies. Alternatively, a public transit operator could provide the subsidized service but would need to improve on traditional cost effectiveness by relying on TNC ride-hailing technology, using smaller vehicles sized to demand, and flexible driver employment terms where drivers are paid by trip versus by hour. Note that implementation of this strategy would require regional or local agency implementation, substantial changes to current transit practices, and would not likely be applicable for individual development projects.
6. **Implement subsidized or discounted transit program.** This strategy reduces the need to own a vehicle or reduces the number of vehicles owned by a household by incentivizing individuals to use transit for their daily commute. This strategy depends on the ultimate building tenants—whether residential landlords or businesses—and may require monitoring. This strategy also relies on B-Line continuing to provide similar or better service throughout the county, in terms of frequency and speed.
7. **Encourage telecommuting and alternative work schedules.** This strategy relies on effective internet access and speeds to individual project sites/buildings to provide the opportunity for telecommuting. The effectiveness of the strategy depends on the ultimate building tenants and the nature of work done by tenants' employees (can the work be done remotely in the first place?); two factors that should be considered for potential VMT reduction. Effectiveness may also be limited in more rural areas of the county with limited broadband access.
8. **Provide ride-sharing programs.** This strategy focuses on encouraging carpooling and vanpooling by project site/building tenants, which depends on the ultimate building tenants; this should be a factor in considering the potential VMT reduction.

Regional

Implementing agencies shall require project modifications during the project design and environmental review stage of project development that would reduce VMT effects. For roadway capacity expansion projects, this would include but is not limited to demand management through transportation systems management and operations (TSMO) including the use of pricing.

The Town has subsequently adopted the RTP/SCS and implemented the recommended local-level mitigation measures as Town policy.

Local

TOWN OF PARADISE 1994 GENERAL PLAN (AS AMENDED THROUGH OCTOBER 2010)

The Town of Paradise last adopted its General Plan in 1994, with amendments through 2010. It serves as the Town's guide for continued development and enhancement. The following goals, objectives, policies, and implementation measures related to transportation and circulation are applicable to the project:

Circulation Goals

- CG-1 Support cooperative and coordinated transportation planning and development activities with federal, state, regional, and local agencies in order to assure maximum coordination of effort in the Paradise region.
- CG-2 Provide safe, efficient, and effective traffic flow, both within Paradise and between Paradise and its environs.
- CG-3 Enhance and improve pedestrian and bicycle safety and use by establishing additional linkages between areas of town.
- CG-4 Provide adequate access, including access for emergency vehicles and evacuation, to all new parcels and to existing parcels when feasible.
- CG-5 Maintain and improve local and regional air quality.
- CG-6 Reduce reliance on the automobile by careful land use planning and encourage the use of non-automobile travel modes through a balanced and integrated set of land use and transportation planning policies.

Circulation Objectives

- CO-3 Assure that traffic generated by high density residential land use development will not exceed roadway capacity and level of service standards.
- CO-5 Plan and complete public street improvements to accommodate projected traffic during the planning period.
- CO-6 As necessary, revise and update both the bicycle and pedestrian and the Paradise Memorial Trailway master plans.
- CO-10 Encourage efforts to significantly reduce reliance on the private automobile during the fifteen year planning period.

Circulation Policies

- CP-1 The town shall strive to maintain a level of service (LOS) "D" or better as the standard for new and existing roadways in the Paradise planning area. LOS "D" or better should be maintained on all local streets within the town limits, and LOS "C" or better should be maintained whenever feasible.
- CP-4 New land use development shall be required to mitigate its share of the circulation impacts it creates.
- CP-5 Methods of recovering costs associated with use of roadways within the Town of Paradise by residents of the Upper Ridge should be explored, including imposition of development impact fees.
- CP-10 Safe paths for pedestrians, equestrians, and bicyclists should be provided, particularly for school children and the elderly. A sidewalk and pathway development program should be instituted for selected locations and where feasible should link with the Paradise Memorial Trailway.
- CP-12 The Town shall encourage Butte County to require development applications within the secondary planning area [Sphere of Influence] to dedicate and improve streets to town standards and to provide other transportation improvements (e.g., bus stops, park-and-ride lots).
- CP-13 Automobile dependency within Paradise should be reduced for local residents and visitors by implementing congestion management and trip reduction plan programs that decrease the number of vehicle miles travelled which, in turn, reduces air pollution and congestion and saves energy.
- CP-14 As staff and funding become available, expanded transit services for seniors and the handicapped should be promoted in accordance with the results of future studies.
- CP-15 Expand public transportation services within Paradise and between Paradise and major employment centers as feasible, based on service demand and financial constraints.
- CP-17 Whenever the LOS "D" is reached on roadways within Paradise, the town shall explore all feasible alternatives for improving traffic flow, rather than automatically implementing a road widening project.
- CP-19 As staff and resources become available, the town should strive to increase the transit opportunities for children and senior citizens in the community.

Circulation Implementation Measures

- CI-3 Establish a town wide development impact fee program, and review and update on an annual basis.
- CI-6 Identify locations for sidewalks and pathways along existing major collector and arterial roadways as well as standards for requiring sidewalks adjacent to new developments.
- CI-7 Require new development to provide a pedestrian pathway on at least one side of new public streets and new private roads (if feasible).
- CI-8 Improve shoulders of some roads to make them safer for pedestrians and bicyclists and relocate mailboxes where feasible from sidewalks.
- CI-9 Require transportation facilities such as bus stops to be incorporated into major new developments.

As listed above, the General Plan has goals, objectives, policies, and implementation measures related to maintaining mobility as measured through Level of Service (LOS). However, LOS is no longer deemed an appropriate transportation measure of environmental impact under CEQA and is therefore not relevant to this memorandum focusing on CEQA impacts.

TRANSPORTATION MASTER PLAN

The Town is currently developing its comprehensive *Transportation Master Plan* (TMP). The TMP will guide long-term transportation improvements. Key components of the TMP include:

- **Traffic needs analysis:** This analysis will recommend improvements to the roadway system serving connections to schools, parks, shopping areas, jobs, and local homes. The recommended concepts will address traffic and circulation needs for all roadway users.
- **Traffic evacuation planning:** This planning analyzes the Town's transportation network to serve traffic evacuation needs and will address pinch points, improve the backbone network, identify new connections, facilitate operations during an evacuation, and coordinate with regional partners and public safety responders.
- **Active Transportation Plan:** This plan will evaluate opportunities for walking paths, sidewalks, and bikeways and will position the Town to pursue grant funding for implementation.

Other components of the TMP include economic/redevelopment support, new roadway standards, and major projects coordination.

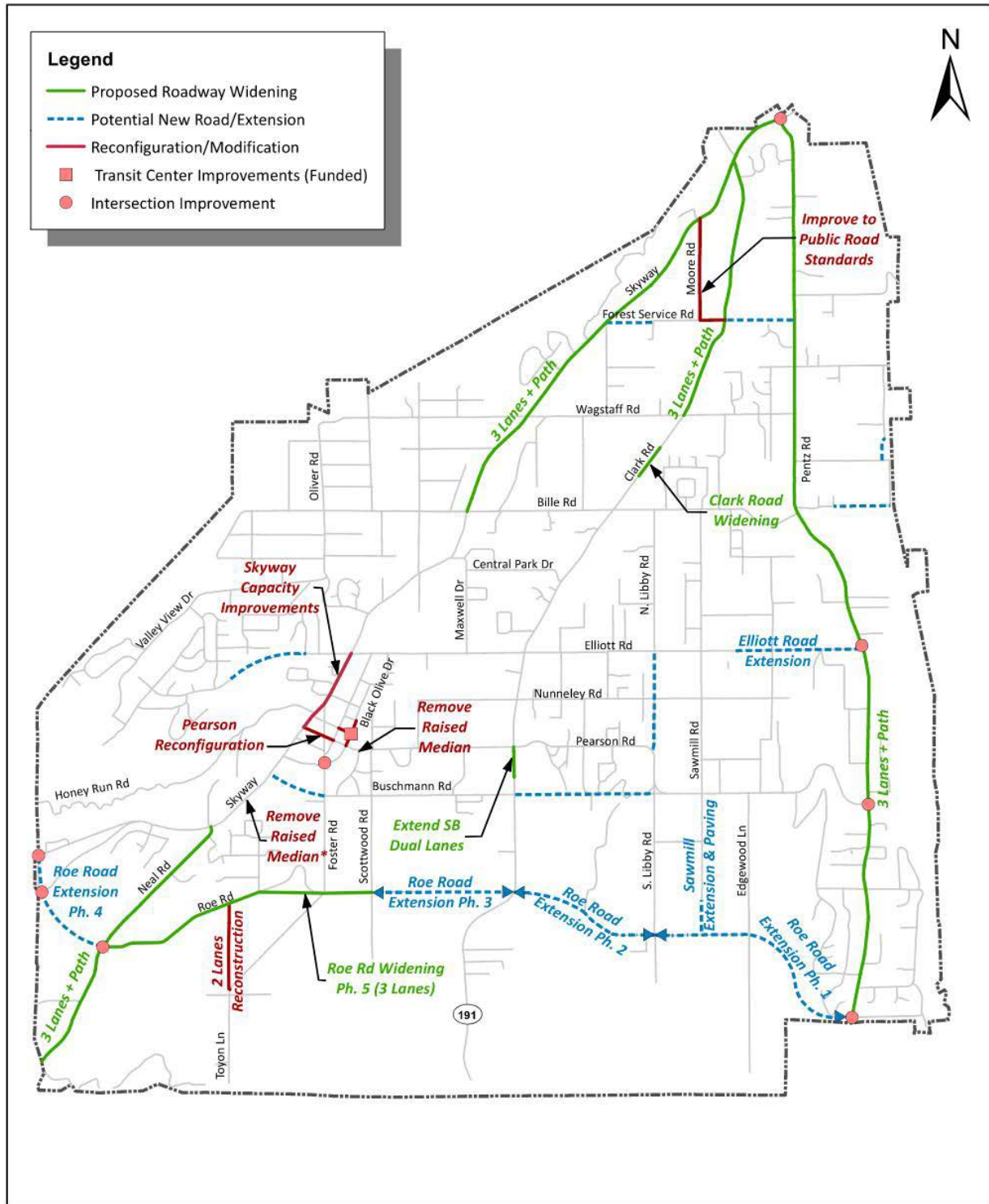
As part of the evacuation planning, the Town is determining major and secondary evacuation routes, potential areas of congestion, and opportunities for roadway extensions and connections on dead-end streets for additional routes and increased evacuation capacity. Figure 6 shows identified draft proposed roadway modifications, which include:

- Roadway widening, particularly downtown Skyway between Elliott Road and Pearson Road

- Roadway widening plus a multiuse path for emergency response along segments of Skyway, Clark Road, and Pentz Road.
- Roadway extensions including Roe Road and Elliot Road
- Intersection modifications

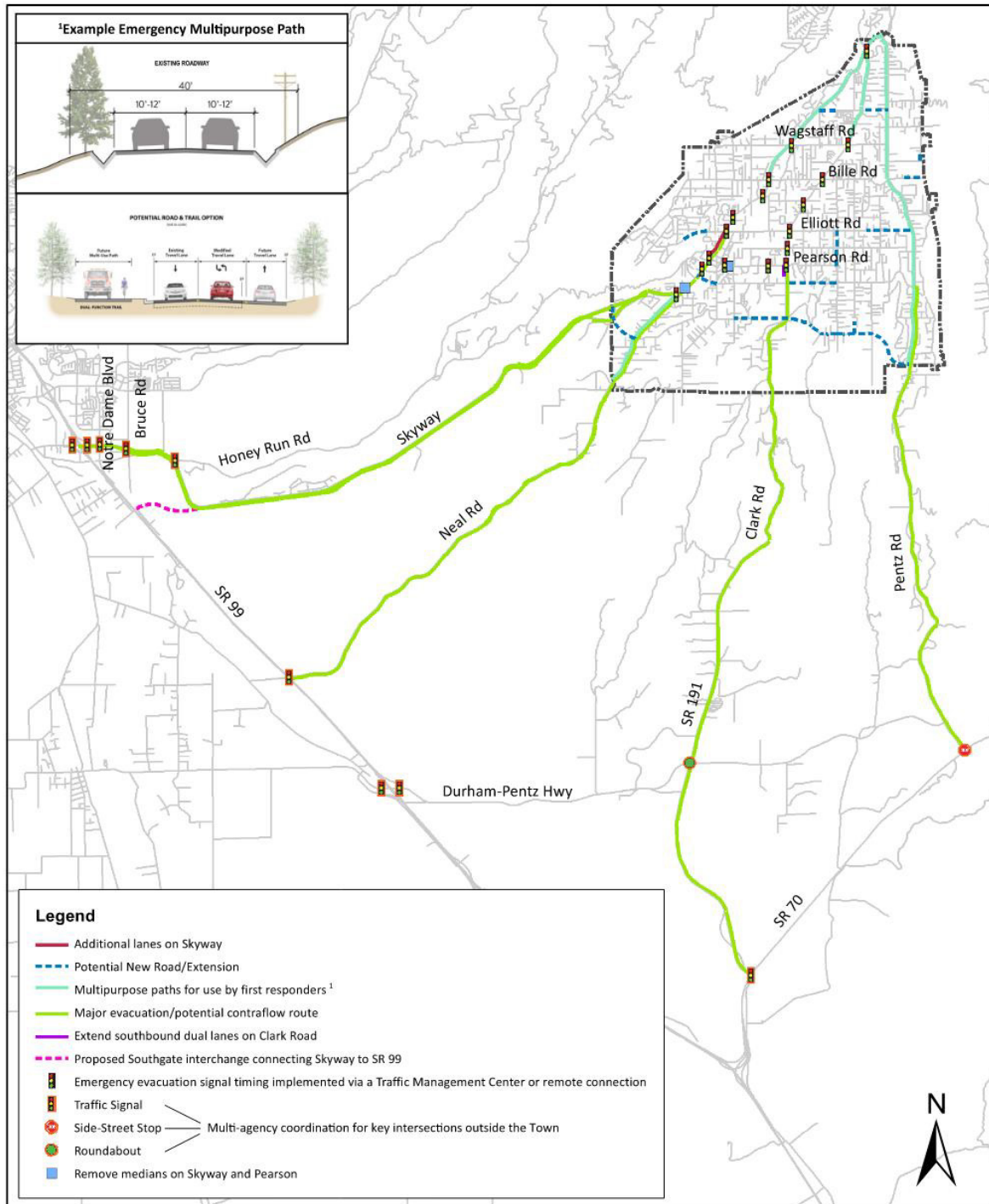
Figure 7 and Figure 8 show proposed evacuation routes and modifications to serve those routes.

Figure 6: DRAFT Roadway Modifications as Part of Paradise TMP



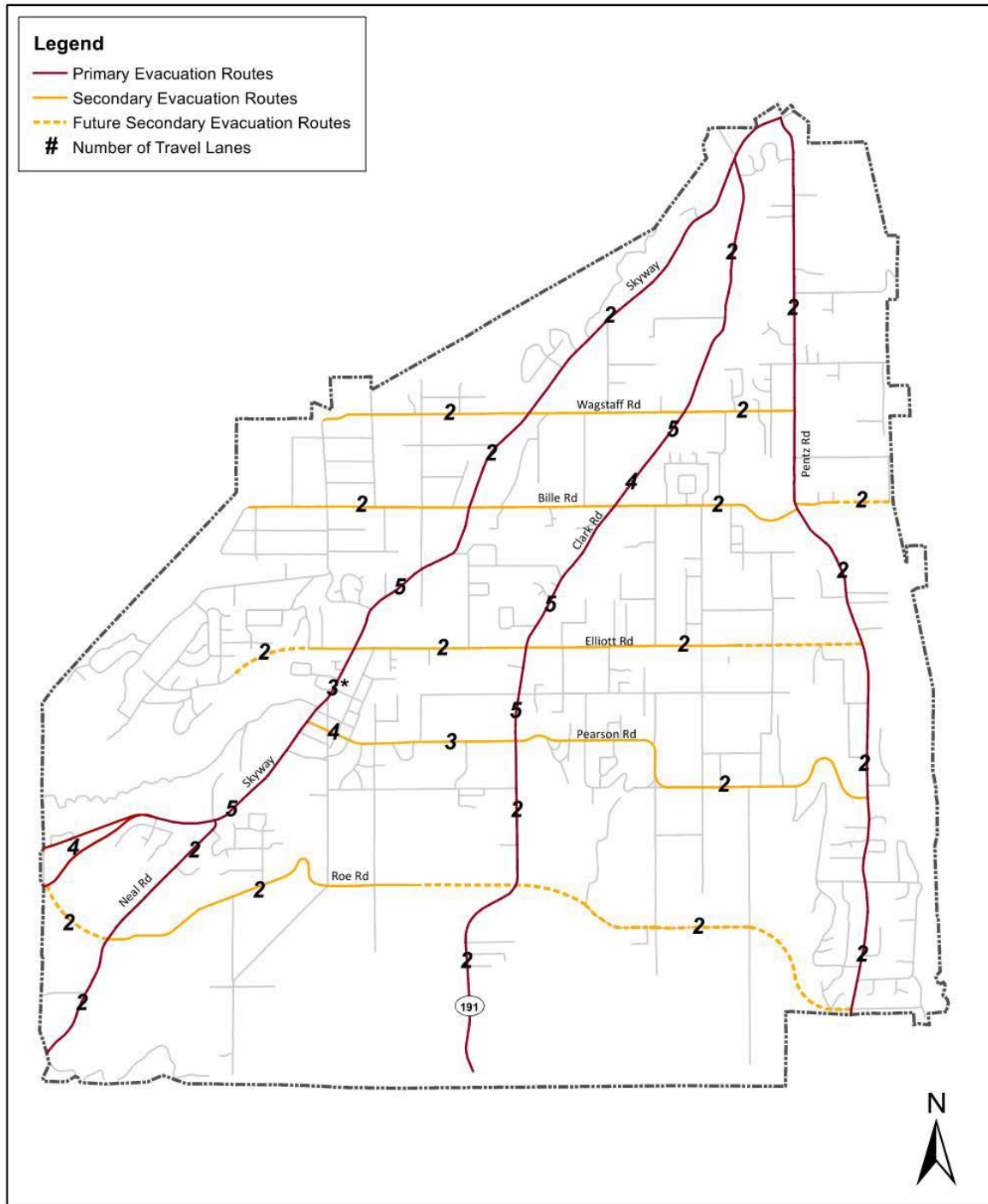
Source: Headway Transportation, Town of Paradise

Figure 7: DRAFT Planned Evacuation Modifications



Source: Headway Transportation, Town of Paradise

Figure 8: Paradise Major Evacuation Routes



Source: Headway Transportation, Town of Paradise

TRANSPORTATION ANALYSIS

This transportation analysis assesses how the study area's transportation system would operate with the implementation of the proposed project. This analysis includes effects that would result in significant impacts under the California Environmental Quality Act (CEQA) guidelines.

CEQA Significance Criteria

The project's impact is not considered to be significant unless it would:

- a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
- b. Conflict or be inconsistent with CEQA Guideline section 15064.3, subdivision (b).
- c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- d. Result in inadequate emergency access.

Significance criteria "b" is related to the implementation of vehicle miles traveled (VMT) as the primary performance metric. The following criterion is used to assess a significant impact related to VMT consistent with considerations presented in the BCAG SB 743 Implementation study dated June 2021:⁵

- A proposed residential project in an area exceeding a level of 15 percent below existing regional average home-based VMT per resident (also referred to as 85 percent threshold) would result in a significant VMT impact. Home-based VMT per resident includes all automobile (i.e., passenger cars and light-duty trucks) vehicle-trips that start or end at the home but excludes non-home-based trips made by residents elsewhere in the transportation network.

The baseline for comparison is the 2020 model base year which is based on 2020 land use levels, but more "typical" pre-COVID travel patterns.

VMT Analysis

As described in the Existing Conditions section, the BCAG travel demand model was referenced to assess the baseline and future year average household VMT per resident for the TAZs that comprise the Paradise planning area and Butte County. The table demonstrating comparative

⁵ BCAG SB 743 Implementation, Fehr & Peers. June 2021. <http://www.bcag.org/Planning/SB-743-Implementation-Study/index.html>. Accessed January 21, 2022.

VMT is recreated in Table 5, with the addition of the level that would represent 15 percent below the countywide average.

Table 5: BCAG Travel Demand Model Daily Home-Based VMT per Resident

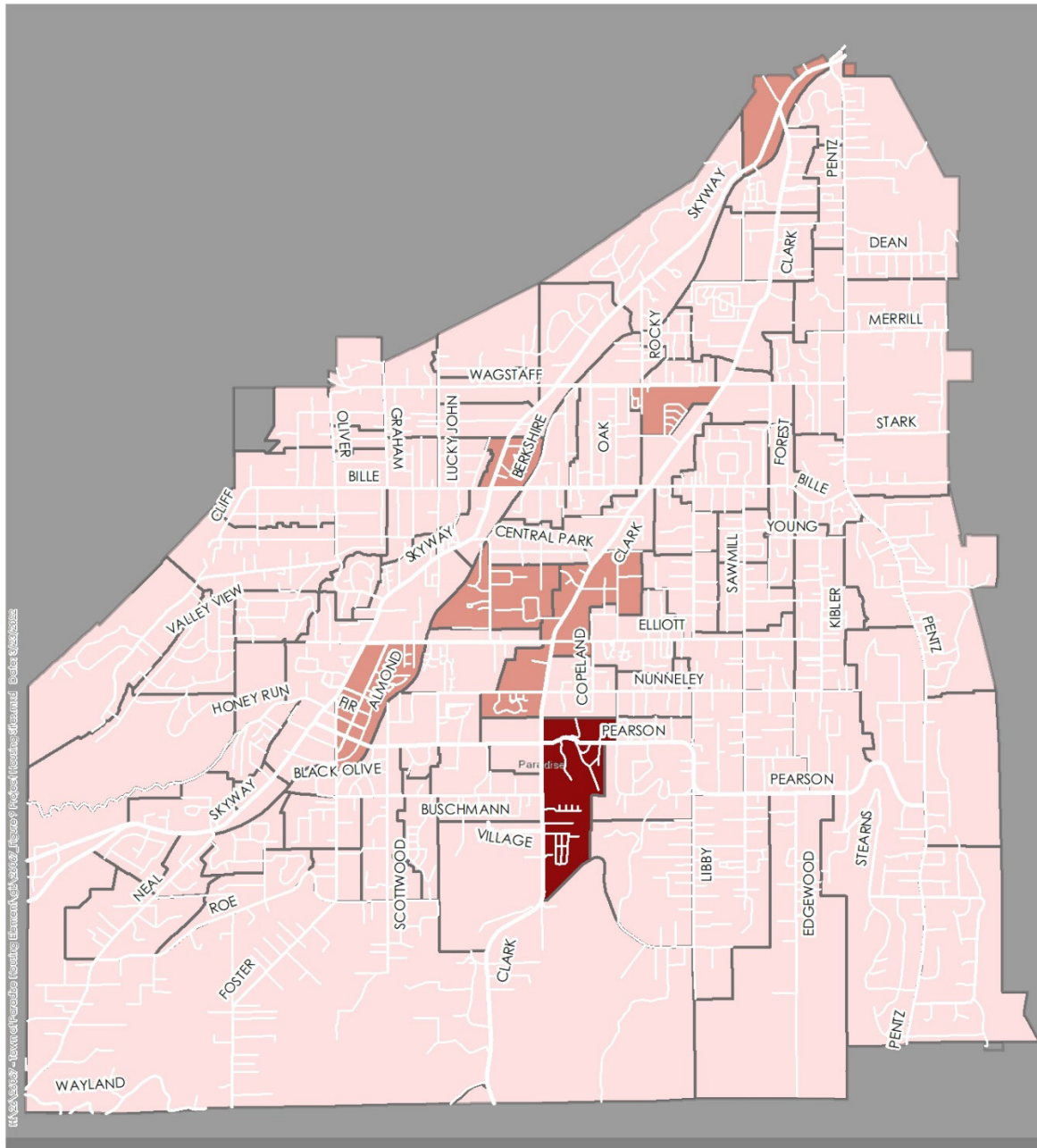
| Planning Area | Model Year 2020 | Model Year 2045 |
|---|-----------------|-----------------|
| Butte County Average (Resulting 85% Threshold) | 11.6 | 12.3 |
| Level at 15% Below County Average | 9.9 | 10.5 |
| Paradise | 15.8 | 17.5 |

Source: BCAG

As Table 5 demonstrates, the average VMT per resident in Paradise is 60 or more percent higher than the impact threshold of 15 percent below existing regional average home-based VMT per resident. The SB 743 guidelines also allow for comparison of VMT values within the Town. For the project to result in VMT below the 15% reduction threshold, proposed residential development would need to be concentrated in low-VMT areas within the Town.

The approximate locations of planned dwelling units for the housing element were compared to model outputs at a screening level to assess whether the Housing Element may, in aggregate, be building in low VMT areas and therefore result in less-than-significant VMT impacts.

Figure 9, compared against Figure 4 and Figure 5, demonstrates that the proposed residential development is not concentrated in low-VMT areas and therefore would more contribute to more residential development in high VMT areas.



Paradise City Limit Apprximate Share of Total Residential DUs

| | |
|-----------|-------------|
| 0% - 2.5% | 5.1% - 7.5% |
| 2.6% - 5% | 7.6% - 10% |

0 3,750 Feet

Figure 9



**Paradise Housing Element
 Project Sites**

CEQA PROJECT IMPACTS AND PROPOSED MITIGATIONS

THRESHOLD: WOULD THE PROJECT CONFLICT WITH A PROGRAM, PLAN, ORDINANCE OR POLICY ADDRESSING THE CIRCULATION SYSTEM, INCLUDING TRANSIT, ROADWAY, BICYCLE, AND PEDESTRIAN FACILITIES?

Impact TRANS-1 **The proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. This would be considered a less-than-significant impact.**

Development associated with the proposed project would increase the residential density within the Town of Paradise, comprised largely of reconstructing dwelling units destroyed by the 2018 Camp Fire. No components of the proposed project conflict with the General Plan goals, objectives, policies, and implementation measures previously described. Similarly, no aspect of the planned increase in housing development and residential density conflicts with existing or planned bicycle facilities, rail facilities, or transit service. Additionally, development that occurs as part of the project (Housing Element implementation) will comply with the policies adopted by the Town as part of its adoption of the RTP/SCS. Policies in the RTP/SCS will promote future residential development to align with existing regional programs, plans, ordinances, and policies:

- **Provide pedestrian network improvements.** Network improvements that connect individual sites to existing networks and nearby destinations would improve opportunities for walking in Paradise.
- **Provide traffic calming measures and low-stress bicycle network improvements.** Providing low-stress bicycle infrastructure that connects areas of proposed development to existing and planned networks would improve opportunities for biking in Paradise.
- **Implement subsidized or discounted transit program.** Whether implemented on a project-by-project basis or programmatically with applicability to future residents, subsidized transit would improve opportunities for people to take transit to, from, and within Paradise.

No mitigation measures would be required. This conclusion is consistent with the RTP/SCS Impact T-1 finding.

THRESHOLD: WOULD THE PROJECT CONFLICT OR BE INCONSISTENT WITH CEQA GUIDELINES SECTION 15064.3, SUBDIVISION (B) - A PROPOSED RESIDENTIAL PROJECT IN AN AREA EXCEEDING A LEVEL OF 15% BELOW EXISTING REGIONAL AVERAGE HOME-BASED VMT PER RESIDENT?

Impact TRANS-2 **Implementation of the project would conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) - A proposed residential project in an area exceeding a level of 15% below existing regional average home-based VMT per resident. This would be considered a significant impact.**

As described in the VMT Analysis section and shown in Figure 9, the majority of proposed residential development under the project would be located in areas in which residents on average generate at least 85% of the regional daily residential vehicle miles traveled on a per resident basis ("high VMT areas"). Therefore, the project would conflict with CEQA guidelines and regional VMT reduction goals consistent with the findings of the RTP/SCS EIR.

As described above, BCAG certified the RTP/SCS SEIR and adopted a statement of overriding considerations for the significant and unavoidable impacts. The Town of Paradise subsequently relied on the BCAG's EIR and adopted the updated RTP/SCS and also adopted findings of overriding consideration. The finding that implementation of the project would result in a significant VMT impact is consistent with the findings of the RTP/SCS EIR. As part of adopting the RTP/SCS, the Town committed to the policies in the plan as well as the local-level mitigation measures from the EIR, as a result, the following mitigation measures are applicable to the project:

1. Increase diversity of land uses.
2. Provide pedestrian network improvements.
3. Provide traffic calming measures and low-stress bicycle network improvements.
4. Implement car-sharing program.
5. Increase transit service frequency and speed.
6. Implement subsidized or discounted transit program.
7. Encourage telecommuting and alternative work schedules.
8. Provide ride-sharing programs.

On April 12, 2022, the Town adopted the VMT policies based upon the BCAG required mitigation measures for air quality and transportation as Resolution 2022-24. Therefore, some subsequent residential projects that may have resulted in an impact would be reduced to less than significant. Programmatically however, that cannot be guaranteed. Therefore, this impact would remain significant and unavoidable consistent with the findings of the RTP/SCS Impact T-2 finding and no additional mitigation is needed.

THRESHOLD: WOULD THE PROJECT SUBSTANTIALLY INCREASE HAZARDS DUE TO A GEOMETRIC DESIGN FEATURE (E.G., SHARP CURVES OR DANGEROUS INTERSECTIONS) OR INCOMPATIBLE USES (E.G., FARM EQUIPMENT)?

Impact TRANS-3 Implementation of the project would not substantially increase hazards due to a geometric design feature or incompatible uses. This would be considered a less-than-significant impact.

The project designates future feasible sites for residential development and is proposing to increase the amount and density of residential land uses. The Housing Element includes programs to rezone land within the Town's planned Sewer Service Area. A Sewer Service Overlay Zoning District would be established with implementation of the project that would apply only when the sewer is implemented. Most notably, the Sewer Service Overlay Zone would increase the allowed residential density in the Community Facilities (C-F) zone from 1 dwelling unit per acre to 20 dwelling units per acre. Other changes would be less substantial, and the project

identifies residential development sites only where adjacent land uses are compatible. Therefore, the project would not introduce incompatible land uses.

The Safety Element also contains programs and policies related to updating the transportation network, but it does not propose new roadway design features. Rather, any future residential development covered in this project would be subject to local development review to include a review of design features and would be required to comply with all local and state design guidelines. Two policies from the Safety Element related to emergency access are included below:

- **Implement other circulation improvements in the Transportation Master Plan that will provide benefits for emergency preparedness, response, and evacuation.** The Town will include emergency vehicle access requirements in the Paradise Municipal Code subdivision and zoning ordinances, Town-adopted road standards, and Town-adopted current California Fire Codes. Through the development review process and in accordance with the Butte County Community Wildfire Protection Plan, adequate roads shall be required to be constructed and/or improved for emergency vehicle access, particularly in high wildland fire hazard areas.
- **Continue to limit the densities of development on parcels that do not have adequate emergency access.** At a minimum, the Town will not approve any discretionary permit or project that requests an increase of existing residential density on parcels that are served access by either an existing or resultant cul-de-sac exceeding a maximum length of 1,800 lineal feet. The Town will look to the Transportation Master Plan and Board of Forestry for guidance on potentially developing more stringent access requirements. New development will be assessed on a project basis to ensure that new land uses will not cause emergency responses times to fall below acceptable levels. The Town will strive to maintain an overall fire insurance (ISO) rating of three or better, and an emergency fire response within five minutes for 90 percent of all emergency incidents within the Town Limits.

For the reasons above, the project is not anticipated to cause a substantial increase in hazards due to design features or incompatible uses. No mitigation measures would be required. This conclusion is consistent with the RTP/SCS Impact T-3 finding.

THRESHOLD: WOULD THE PROJECT RESULT IN INADEQUATE EMERGENCY ACCESS?

Impact TRANS-4 Implementation of the project would not result in inadequate emergency access. This would be considered a less-than-significant impact.

As individual residential projects designated in this project come online, the Town will coordinate with individual projects to ensure that emergency routes are not blocked and remain available during construction.

There are no other components of the project that would have the potential to impact emergency access. No mitigation measures would be required. This conclusion is consistent with the RTP/SCS T-4 finding.

APPENDIX B

EXHIBIT "A"

**TOWN OF PARADISE
RESOLUTION NO. 2022-24**

**A RESOLUTION OF THE TOWN COUNCIL OF THE TOWN OF PARADISE ADOPTING CEQA
FINDING, ADOPTING THE TOWN OF PARADISE'S STATEMENT OF OVERRIDING
CONSIDERATIONS, AND THEREAFTER APPROVING ITS VMT POLICIES**

WHEREAS, the Town of Paradise is a member of BCAG and participated in the preparation and adoption of the 2020 update of the Butte County Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS); and

WHEREAS, as the Town recovers from the Camp Fire, it needs to adopt policies and procedures to anticipate and mitigate environmental issues which may arise from the return of its population, as well as to be in compliance with current environmental rules and regulations; and

WHEREAS, the Town has pending projects which require the initial adoption of such policies, specifically including but not limited to the adoption of the updated Housing Element; and

WHEREAS, the Butte County Association of Governments (BCAG) is the designated Metropolitan Planning Organization (MPO) comprised of six member agencies: Butte County, the cities of Biggs, Chico, Gridley, Oroville, and the Town of Paradise; and

WHEREAS, BCAG is the agency responsible for maintaining a continuing, cooperative, and comprehensive transportation planning process which will result in a Regional Transportation Plan and Sustainable Communities Strategy pursuant to 23 U.S.C. 134(a) and (g), 49 U.S.C. §5303(f); 23 C.F.R. §450, and 49 C.F.R. §613; and

WHEREAS, BCAG was the Lead Agency in preparing the Regional Transportation Plan and Sustainable Communities Strategy and its supporting Supplemental program EIR in compliance with the California Environmental Quality Act (CEQA) [Cal. Pub. Res. Code § 21000 et seq.]; and

WHEREAS, BCAG determined that a Supplemental program EIR (SEIR) consistent with CEQA Guidelines Section 15163 and pursuant to CEQA Guidelines Section 15168(a) was appropriate to assess the environmental impact of the 2020 Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS) for the Butte County region and thereafter that SEIR was circulated, reviewed and certified on or about December 10, 2020; and

WHEREAS, BCAG was the Lead Agency in preparing the Regional Transportation Plan and Sustainable Communities Strategy and its supporting Supplemental EIR in compliance with the California Environmental Quality Act (CEQA) [Cal. Pub. Res. Code § 21000 et seq.]; and

WHEREAS, pursuant to Guidelines Section 15152 (2), use of the SEIR is appropriate for subsequent and narrower projects such as policies of a lesser scope and specific for the adoption of the VMT policies, which is the project here; and

WHEREAS, pursuant to Guidelines Section 15168(c), later activities in the program covered by the SEIR now must be examined by the Town to determine whether an additional environmental document must be prepared for its adoption of the VMT policies, and if the agency finds that there are no effects that were not examined in the program EIR, the environmental review for the project may tier from the SEIR pursuant to Guidelines Section 15162; and

WHEREAS, the Town has examined the adoption of the VMT policies and finds that their adoption is within the scope of the SEIR based upon the provisions of the BCAG SEIR as referenced in this resolution and the Town's adoption of the specific mitigation measures set out in the SEIR and consistency of the policies with the general plan and allowable land uses.

WHEREAS, because the Town is adopting the required VMT analysis and mitigation measures (Measure T-1) set out in the SEIR, tiering from that program EIR not only is appropriate but is required under Public Resources Code Section 21093 and 21094, which provide that to avoid repetition, wasted time and speculation, certain projects are intended to be tiered and overall impacts need not be reassessed, but the CEQA analysis may be based upon their tier 1 SEIR; and

WHEREAS, the adoption of the Town VMT policies is consistent with the provisions of the SEIR and is required by them; and

WHEREAS, the adoption of the Town VMT policies is consistent with the Town General Plan and zoning ordinance; and

WHEREAS, the adoption of the Town VMT policies does not make changes to existing or create new information necessitating additional environmental review at this time, and the application of the policies to each specific project will be reviewed with that project; and

WHEREAS, it is appropriate for the Town to tier the environmental review for the adoption of the policies from the information in the SEIR; and

WHEREAS, no Mitigation and Monitoring Plan is needed as the adoption of the policies constitute such a mitigation and monitoring plan; and

WHEREAS, pursuant to CEQA Guidelines Section 15093(b), where the decision of the public agency may cause the occurrence of significant effects which are identified in an EIR but

which cannot be avoided or substantially lessened, even with mitigation, the agency must issue a Statement of Overriding Considerations setting forth the specific reasons to support its actions based on the Final EIR or other information in the record; and

WHEREAS, the Town cites the following BCAG analysis that explains the basis for the State of Overriding Considerations:

Impact T-2 IMPLEMENTATION OF PROPOSED TRANSPORTATION IMPROVEMENTS UNDER THE 2020 RTP/SCS HAVE THE POTENTIAL TO INTERFERE WITH ACHIEVEMENT OF THE VMT REDUCTIONS SET FORTH IN CARB'S 2017 SCOPING PLAN. IMPACTS WOULD BE GREATER THAN THE 2016 RTP/SCS AND SIGNIFICANT AND UNAVOIDABLE.

The 2020 RTP/SCS is based on planned population and employment growth in Butte County, consistent with the General Plans of Butte County and the Cities of Biggs, Chico, Gridley, Oroville, and Paradise. In addition, since the BCAG travel demand forecasting model is used for the analysis of the 2020 RTP/SCS, regional employment and population forecasts and the corresponding transportation system of the 2020 RTP/SCS are also incorporated.

Table 4.9-1 provides estimates of total VMT generated for Butte County for each analyzed scenario. As shown in Table 4.9-1 compared to 2018 baseline conditions, the total VMT in Butte County would increase in 2040 regardless of the potential implementation of the 2020 RTP/SCS. This increase is due to regional population growth that would occur in the County independent of policy and land use decisions by BCAG. As compared to the 2040 No Project scenario, the 2020 RTP/SCS would decrease the total VMT in the region by approximately 14 percent.

The overall County data provided as part of Section 4.9 *Transportation and Circulation* includes information from Paradise. For example, maps on Figure 4.9-1 include roadways in Paradise and Section 4.9.1 indicates Bus Route 31 between Paradise and Oroville has been suspended as a result of the Camp Fire. The supplemental analysis regarding the Camp Fire provided along with the 2020 RTP/SCS indicates that the fire has caused increased trips as people travel to jobs from relocated homes and as equipment and building supplies come into Paradise. While Table 4.9-1 provides estimates of total VMT for Butte County, the results of that analysis are correct for Paradise.

Table 4.9-1 Total Vehicle Miles Traveled – Butte County

| Variable | Baseline (2018) | 2040 No Project | 2040 Plus Project |
|-----------------------------|-----------------|-----------------|-------------------|
| Total VMT ¹ | 4,705,417 | 6,216,655 | 5,332,327 |
| % Change from Baseline | N/A | 32.1% | 13.3% |
| % Change from No Project | N/A | N/A | -14.2% |
| Population | 227,621 | 319,342 | 265,964 |
| Total VMT per Capita | 20.7 | 19.5 | 20.0 |

| | | |
|---------------------------------|--------------|--------------|
| % Change from Baseline | -5.8% | -3.4% |
| % Change from No Project | | 2.5% |

¹ Includes total VMT for Butte County, excluding external-to-external trips. Estimates and forecasts from 2020 RTP/SCS BCAG travel demand forecasting model.

Source: Appendix D

VMT per capita is a proxy for the SB 375 metric of GHG based on VMT within Butte County. While total VMT is lower with implementation of the 2020 RTP/SCS when compared to the No Project scenario, VMT per capita is higher in the 2020 RTP/SCS scenario as compared to the No Project scenario. Total VMT is higher, while VMT per capita is lower because the No Project scenario estimate is based on the adopted 2016 RTP/SCS and includes a much higher population as result of decreased growth projected by the California Department of Finance and losses associated with the Camp Fire for the 2020 RTP/SCS. As a result, the forecast assumed more development and more dense development, including in the Paradise area than is analyzed in the 2020 RTP/SCS. The 2020 RTP/SCS assumes both lower population and lower population density with rebuilding in Paradise, which results in higher VMT per capita even with lower total VMT. Compared to baseline 2018 conditions, VMT per capita is around three percent lower with implementation of the 2020 RTP/SCS.

The VMT per capita decline indicates that the projected land use and planned transportation improvements assumed in the 2020 RTP/SCS would effectively work together to improve system efficiency, as compared to 2018 baseline conditions.

Notwithstanding past and projected progress on VMT reductions in the BCAG region, recent progress reports on the state’s climate goals suggest that additional VMT reductions are required. Both in its target resetting process and in its 2018 progress report pursuant to SB 150, CARB noted:

- The regional 2035 GHG emissions reduction targets under SB 375 are not adequate to fully meet the goals of the state’s 2017 Climate Change Scoping Plan: The Strategy for Achieving California’s 2030 Greenhouse Gas Target. As CARB noted, “An RTP/SCS that meets the applicable SB 375 targets alone will not produce the GHG emissions reductions necessary to meet state climate goals in 2030 nor in 2050.” CARB identified a 6 percent gap between the 19 percent emissions reductions targets set for the regions (over a base year of 2005) and the 25 percent reductions required to meet the Scoping Plan goal.
- Much greater reductions in VMT will be required to meet the state climate goals for 2030 and 2050. CARB concluded that a 14.3 percent reduction in daily VMT per capita and a 16.8 percent reduction in light-duty VMT per capita (over current conditions; 2015-2018) was needed to meet these goals.

- California – at the state, regional, and local levels – has not yet gone far enough in making the systemic and structural changes to how we build and invest in communities that are needed to meet state climate goals. It will take collaboration among all these levels of government to achieve the state’s climate goals because the MPOs do not have the land use authority or resources to meet this challenge alone.

The 2020 RTP/SCS’s proposed three percent reduction in total VMT per capita by 2040 would not support achievement of the 14.3 percent identified by CARB statewide. As a result, the potential of the 2020 RTP/SCS land use pattern and transportation improvements to substantially interfere with achievement of the VMT reductions set forth in CARB’s 2017 Scoping Plan (as part of the regional strategy) is considered potentially significant.

With implementation of Mitigation Measure T-1, this impact would be reduced to less than significant for some projects, although additional state policy actions and funding would be required to close the gap at the state level. For projects proposing to streamline environmental review, lead agencies must conduct project-level analysis for each project to analyze whether, based on substantial evidence in the record, the proposed mitigation would reduce the impact to less than significant. However, BCAG cannot require Butte County and the cities of Biggs, Chico, Gridley, Oroville, and Paradise to adopt these mitigation measures, and it is ultimately the responsibility of these agencies to determine and adopt project-specific mitigation. Therefore, Impact 4.9-2 remains significant and unavoidable.

WHEREAS, the Town therefore adopts its own Notice/Statement of Overriding Considerations, as follows:

The Town of Paradise hereby finds that mitigation measures have been identified in the BCAG SEIR which are implemented by the Town’s VMT Policies will reduce the Project’s incremental contribution to the following significant cumulative impacts, but not to a less than significant level:

- Impact T-2; Mitigation Measure T-1

The Town adopts and makes this statement of overriding considerations concerning the Project’s unavoidable significant impacts to explain why the project’s benefits override and outweigh its unavoidable impacts.

The adoption of the VMT policies will still result in significant and unavoidable impacts because achievement of the vehicle miles traveled reductions set forth by the state cannot be accomplished as a result of the decreased population growth within Paradise and changed travel patterns per capita as a result of the Camp Fire, as well as overall state policies and related requirements as explained above.

Each benefit set forth below constitutes an overriding consideration warranting approval of the VMT Policies, independent of the other benefits, despite each and every unavoidable impact.

- a. The implementation of the VMT Policies will assist with transportation and projects that will provide for a comprehensive transportation system that assist the Town in recovering from the Camp Fire.
- b. The VMT Policies will assist in improving transportation mobility and accessibility in the county.
- c. The VMT Policies will assist in improve air quality by reducing emissions of ozone precursors.
- d. The VMT Policies will assist in setting policies that contribute to a reduction in greenhouse gas (GHG) emissions from passenger vehicles and light trucks as projects are implemented post-Camp Fire.
- e. Adoption of the VMT Policies at this time will allow their inclusion in projects going forward as the Town recovers from the Camp Fire.

NOW, THEREFORE, BE IT RESOLVED BY THE TOWN COUNCIL OF THE TOWN OF PARADISE that:

1. The Recitals set out above are true and correct.
2. The adoption of the Town's VMT Policies was completed in compliance with the California Environmental Quality Act.
3. The Town Council has reviewed and considered the information contained in this Resolution and the attachments to it.
4. The findings reflect the Town Council's independent judgment and analysis.
5. Based on and incorporating all of the foregoing recitals and findings supported by substantial evidence in the record and set forth in the "Findings and Statement of Overriding Considerations," included here, the Town Council hereby tiers its environmental review from the BCAG Final SEIR for the 2020 RTP/SCS and instructs staff to file a Notice of Determination.
6. The Town Council hereby approves the Town's VMT Policies in the form set out on Exhibit "B" and attached and incorporated by reference.
7. This Resolution shall be effective immediately.

PASSED AND ADOPTED by the Town Council of the Town of Paradise this 12th day of April 2022
by the following vote:

AYES: Greg Bolin, Steve "Woody" Culleton, Jody Jones, Rose Tryon and
Steve Crowder, Mayor
NOES: None
ABSENT: None
ABSTAIN: None




Steve Crowder, Mayor

ATTEST: *April 13, 2022*



Dina Volenski, Town Clerk

APPROVED AS TO FORM:


Scott E. Huber, Town Attorney

EXHIBIT "B"
Town of Paradise VMT Policies

The Town of Paradise will develop and implement the following policies as provided by the BCAG 2020 RTP/SCS and set out in the Final Supplemental EIR for that project (SEIR). Such policies will be implemented after the date of adoption as applicable in public and private projects in order to try to reach compliance with BCAG goals and with statewide VMT requirements. As these strategies are included in projects, any possible environmental impacts will be analyzed with the environmental review for that project.

- 1. Increase diversity of land uses** – Staff will encourage the inclusion of mixed uses within the Town to minimize vehicle travel in terms of both the number of trips and the length of those trips. For example, as service businesses return to the Town, they may be located within walking distance of residential areas. Staff will advise potential developers of existing laws and regulation which promote diversity of land uses.
- 2. Provide pedestrian network improvements** – This strategy follows upon the diversity of land uses by encouraging the creation of a pedestrian network connecting to nearby commercial destinations. This is particularly appropriate to connect proposed multifamily projects to nearby service businesses.
- 3. Provide traffic calming measures and low-stress bicycle network improvements** – Traffic calming creates networks with low vehicle speeds and volumes that are more conducive to walking and bicycling. This includes identified bicycle lanes and parking that also are appropriate for e-bikes.
- 4. Implement car-sharing program** – This strategy reduces the need to own a vehicle or reduces the number of vehicles owned by a household by making it convenient to access a shared vehicle for those trips where vehicle use is essential. Note that implementation of this strategy would require regional or local agency implementation and coordination and would not likely be applicable for individual development projects.
- 5. Increase transit service frequency and speed** – This strategy focuses on improving transit service convenience and travel time competitiveness with driving. Given land use density in the Town, this strategy may be limited to traditional commuter transit where trips can be pooled at the start and end locations or require new forms of demand-responsive transit service. The demand-responsive service could be provided as subsidized trips by contracting to private Transportation Network Companies (TNCs, such as Uber, Lyft, and Via) or taxi companies. Alternatively, a public transit operator could provide the subsidized service but would need to improve on traditional cost effectiveness by relying on TNC ride-hailing technology, using smaller vehicles sized to demand, and flexible driver employment terms where drivers are paid by trip versus by hour. Note that implementation of this strategy would require regional or local agency implementation, substantial changes to current transit practices, and would not likely be applicable for individual development projects.
- 6. Implement subsidized or discounted transit program** – This strategy reduces the need to own a vehicle or reduces the number of vehicles owned by a household by incentivizing individuals to use transit for their daily commute. This strategy depends on the ultimate building tenants – whether residential landlords or businesses – and may require monitoring. This strategy also relies

on B-Line continuing to provide similar or better service throughout the county, in terms of frequency and speed.

7. **Encourage telecommuting and alternative work schedules** – This strategy relies on effective internet access and speeds to individual project sites/buildings to provide the opportunity for telecommuting. The effectiveness of the strategy depends on the ultimate building tenants and the nature of work done by tenants' employees (can the work be done remotely in the first place?); two factors that should be considered for potential VMT reduction. This strategy relies on the Town continuing to move forward towards the installation of town wide broadband infrastructure as reported in the 2021 Paradise Broadband Feasibility Study.
8. **Provide ride-sharing programs** – This strategy focuses on encouraging carpooling and vanpooling by project site/building tenants, which depends on the ultimate building tenants; this should be a factor in considering the potential VMT reduction.