

Butte Environmental Council



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Submitted by e-mail to
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Subject: Draft Chico 2030 General Plan Update, March 31, 2010

The following comments are respectfully submitted on the following sections of the Draft Chico 2030 General Plan Updated, dated March 31, 2010.

1. Introduction
2. Sustainability Element
3. Land Use Element

Comments to other elements of the Draft General Plan will be submitted prior to the scheduled Joint Council/Commission Meetings on July 24, August 21, and September 28. Since much of the Plan has to do with accommodating expected growth, I preface my comments with a note regarding the way the expected population growth is being allocated in the county and, consequently, to Chico. I suggest that Chico reconsider the method that the Butte County Association of Governments (BCAG) uses to distribute the State's allocation to the county for accommodating the population growth it projects for Butte County each year. The current way is for BCAG to distribute the population growth equally among the municipalities and county by current population. There is another way that would have less impact on the environment. The current method induces sprawl throughout the county. Directing the majority of the population growth to Oroville should be considered as a means of the population growth having less impact on the environment. Oroville has a large area accepted for growth, and it could be planned to have the least impact on the environment while being appreciated to improve the economies of scale in Oroville for increased business opportunities, public transit, and other public services. Oroville is closer for commuters to the Sacramento area and to the Bay Area, and growth at the southern end of Butte County to the east of the best soils for agriculture and within areas there that are generally already urbanized makes better sense for more sustainable development than the approach used now. I have made the same recommendation to the County. Accompanying action items would be to approach Oroville to see whether or not they would welcome this approach, what I have referred to as "the Oroville option", and to work with BCAG in distributing the annual projected growth allocations differently.

Introduction, re: Planning Area

The text describes New Growth Areas including Special Planning Areas; in other words, Special Planning Areas are areas for growth and development (p. 1-3). The General Plan Planning Area is "other land in unincorporated Butte County which relates to the City's planning efforts." (p. 1-9). This definition needs to be clarified and expanded here and in the Glossary. Particularly vague and unnamed is the area in light yellow on the map on p. 1-12. Within the current definition the Planning Area includes the City of Chico, the Chico Sphere of Influence, plus the light yellow area. It remains undefined what the City of Chico's future intentions may be for the very large area in light yellow encircling the SOI, which extends far beyond the Green Line to west and southwest, meeting Paradise's

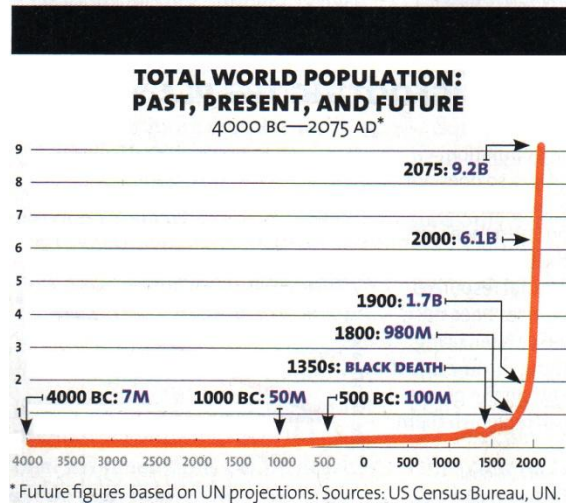
SOI to the east, etcetera. Within Special Planning Area, “planning area” means a place for growth and development into non-urbanized land; therefore, it could be concluded that the entire Chico Planning Area would mean the same.

Within the Land Use Element there is one clarifying policy (LU-1.1) and one related action item (LU-1.1.2) which both relate to coordinating planning. This is admirable, but weak. If the intention is to not prematurely grow into the area indicated by light yellow, then state that policy clearly in the Land Use Element so that other entities like Paradise and the County know that not only would consultation be desired, but also that Chico would probably not support development in the light yellow areas. Add definitions and clarity about the light yellow area to the Introduction and to the Glossary; “...relates to the City’s planning efforts” is extremely vague. The unplanned area within the “planning area” and outside the SOI needs to be defined and given more elaboration as to the reason for its inclusion in the general plan update.

Sustainability Element

Kudos for developing this element! BEC fully supports the balancing of environmental, economic, and social equity components. Within the definition of Sustainability, “future generations” could mean forever or it could mean until 2030; pick a time in the future that would satisfy being a sustainable community and at the same time clarify that this plan for sustainability is intended to mean well beyond 2030. I recommend the year 3000 as a goal to measure sustainability, but if we can make it to 2100, that would be quite an accomplishment given our current place on the exponential growth curve of the population worldwide, and the current limits of available fresh water, energy, and food. (Insert from *The Last Taboo* by Julia Whitty, May/June 2010 *Mother Jones*, p. 29) It is becoming abundantly clear to those who pay attention that these times are like no other, such that we will either change the way we live within the next decade or there will be major crashes in the environment, the economy, and in social equity in more and more communities. There are regional crashes now, including deaths by war and terrorism, disease and pollution, starvation and dehydration. With the interconnection of economies in our globalized market, Chico certainly can and needs to be looking out for its own and being an example for other communities. With the added factor of global warming affecting sustainability of our water use, planning needs to take on a far different approach than has been the status quo. The correct element is included; however, it is rather brief given the challenges.

Divide the goals by the three Es of sustainability, and address each separately. Have as an economic goal to better understand and eventually to apply no growth economics (a.k.a. steady state economics) rather than the current “gospel of consumption” for a community to survive economically. Economists of all theoretical persuasions have recognized the limits of growth. (See, for example, *Nothing Grows Forever: Why do we keep pretending the economy will?* by Clive Thompson, in May/June 2010 *Mother Jones*)



Chico needs to have a goal of better understanding what economic sustainability looks like stated within the sustainability element.

Nearly missing in the Sustainability Element as an environmental goal with associated policies and action items is the sustainability of fresh water sources. Policy SUS-4.2 addresses water efficient landscaping, with a singular action item of installing drought tolerant landscaping in new City facilities...; however, there is no action item to retrofit existing City facilities or encourage the same for the myriad lawns in established neighborhoods.

In Goal SUS-5, non-renewable resource consumption is vague. Is this only about energy? If so, state it as such. There needs to be a goal and associated policies and action items specifically related to water.

One goal should be to remain on groundwater and not to become dependent on importing water from the Oroville Reservoir. Putting the infrastructure in place will be expensive, and it is unnecessary. Other methods are available and should be used first, despite the State's use-it-or-lose-it approach regarding the Table A allocation of water. The state is also after groundwater, and a stated goal should be to keep the Tuscan aquifer as a naturally recharging system, sustainably used, and protected from overuse locally or statewide. Already, the Tuscan is overused. Any new development will contribute to this overuse unless Chico changes the way it uses water. There are many known strategies to better use and reuse water; name them in the Sustainability Element under water goals, policies, and action items.

Under Policy SUS-7.2, community gardens are supported in appropriate locations. Every lawn in the city could be an appropriate location, and yet there is no goal, policy, and action item to encourage the conversion of lawns to gardens. Another goal needed is the conversion of lawns to permaculture designs or other types of design that use less water and chemicals.

Additions about water use and water quality are needed in the sustainability element. The Sustainability Task Force should continue to be consulted to help improve this element.

Land Use

BEC supports the maintenance of the Green Line. Chico and the county have as a goal finding a way, through the public process, to further solidify the preservation and improvement of lands available to agriculture, in balance with preservation of lands for the environment; state this as a goal in the Sustainability Element and reinforce it in the Land Use Element in tangible ways. Growth "out" should not appear on the Land Use Diagram (Fig. LU01), where sprawl is apparent. Filling the SOI with Special Planning Areas is an improvement to past planning practices, but it is not enough to attain the vision of compact urban form. Redevelopment using the mixed use concept is the way to accommodate growth and achieve sustainability. There are plenty of units of single family homes already built or zoned in the Chico SOI. Growth must include more of the other types of residential units for Chico to attain sustainable development. Address the Oroville option for Butte County in the Chico 2030 General Plan.

The process appears to be sympathetic to developers proposing projects in the outskirts of the city, where land is cheaper and termed "scab land" by some. The plan and process appear also to be fearful of what the county may approve should Chico not sprawl. Nevertheless, there should be no compromise in the general plan for the future Chico that

is envisioned, one where the projected economics favors public and multi-modal transportation, where the current “energy crisis” becomes a disaster unless alternate forms of transportation become feasible in Chico and elsewhere before the crisis peaks. Land use planning to 2030 should not further any sprawl at all, by the City of Chico or by Butte County. Chico and Butte County must be clearly united on this in their general plan updates.

The Land Use Development Assumptions listed in Appendix D appear to be based on the status quo continuing; what if the way development has occurred in the past is not the way it will happen in the next 20 years? In some ways it could since the assumptions are used as a template for growth; however, if growth is to be different by design for the projected health, safety, and welfare of citizens, past assumptions should not inform future growth. The Land Use tables are appreciated; however, they appear to be based on past assumptions about growth and growth practices that should be updated according to the stated vision on page 3-1, without, that is, the last sentence in the vision paragraph about new neighborhoods. Omit that sentence, or change the word “new” to “redeveloped” neighborhoods in that sentence.

In Policy LU-1.3, omit the last phrase, “and allowing expansion into Special Planning Areas”, or add “that are in non-urbanized areas”.

Goal LU-6 and associated policy and action items are not needed, especially regarding housing, given the alternative approaches stated in this letter. There is no projected need to 2030 in or around Chico to rezone any land for additional single family housing.

Underused and abandoned retail and industrial spaces in Chico are heavy, and there is no acceptable evidence given that there is a projected need to 2030 to rezone any land for such purposes.

As you know, developers may at any time go forward to the staff and to the Council to be considered for a change to the General Plan; there is no need to accommodate any sprawl in the Chico 2030 General Plan. There is good reason to follow the stated vision, minus “new neighborhoods”. Again, “redeveloped neighborhoods” is more the vision.

Re-synthesize the Land Use element goals, policies, and action items to match the vision so stated. BEC supports strengthening the General Plan language, as needed throughout the plan with “must” and “shall”, to best follow the vision set forth for a truly sustainable Chico Planning Area to at least the year 2100. Where “encourage” is used (such as I have stated above) in goals, it should be followed up with stronger language in associated policy and action items.

Respectfully submitted,



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Advocacy Director