

# Butte Environmental Council



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[www.becnet.org](http://www.becnet.org)

## Activities and Events

Environmental Advocacy  
Environmental Education  
Groundwater Protection  
Endangered Species Faire  
Bidwell Park Cleanups  
Chico Area Creek Cleanups  
Recycling Referrals  
Wetlands Preservation

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## Supplemental BEC Comments to Water Commission on Draft General Plan 2030 DEIR

BEC comments were submitted to the county and Water Commission on May 14, 2010 for consideration. The following are supplemental comments from BEC for the Water Commission's consideration at today's meeting. Comprehensive comments with so many errors in the DEIR and Draft General Plan make definitive comments difficult. Some details and questions have been submitted in recent e-mails, and we await the county's reply. Some policies referenced in the DEIR, for example, cannot be found in the updated draft GP. Water tables and maps in the Setting and Trends report remain incomplete and inconsistent; yet, these are referenced in the DEIR and draft GP. **Fix the inconsistencies and publish an updated DEIR, draft General Plan, Setting and Trends report, Policy Alternatives document, and General Plan Land Use map.**

Overall, the DEIR is difficult to follow. The General Plan is to a large extent a plan for urban expansion, with specific growth areas studied for change. The DEIR fails to make impacts to the environment from certain areas, those given a nod for a change in land use and zoning in the draft general plan, understandable for each of these change areas. Restated, the way the DEIR is organized makes it very difficult to understand the impact on the environment for each such area. In particular, for this comment letter to the Water Commission, the general source of sufficient water for each individual change area is not clearly indicated or studied for potential impacts to the associated environment. **Clearly show each growth area and analyze the environmental impacts for each individually.**

Overall, the need for each of the growth areas is not clearly delineated. The general plan update process is largely, to date, land owner and developer driven rather than driven by policy. This is not a new critique; we have been reassured along the way that policies would guide the process after the consideration of what land owners and developers propose; however, we do not see in the DEIR that the growth areas are called for. The DEIR fails to show that the existing residential zoning within municipalities and reasonable spheres of influence, which are not easily decipherable in the DEIR, are insufficient for population growth to 2030 and beyond. **Clearly show each SOI as it exists and each SOI as proposed and why urban growth beyond those areas is needed.**

The DEIR fails to clearly estimate the probable types of jobs available, income levels, and types of residential units that justifiably should be built to accommodate that need. Moreover, the type of housing proposed does not appear to be the type of housing that is most needed for growth. Lower income housing is needed; however, the residential uses proposed are largely for single family units that tend to be expensive and classic sprawl. This is status quo growth, not sustainable growth and not in any way relating to current best practices for sustainable uses of land, air, and water. **Clearly show in the DEIR that the areas proposed for urban expansion will meet the needs of the majority of people for the projected population growth.**

Respectfully submitted,

Robin Huffman  
Advocacy Director

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