V. GENERAL IMPACT CATEGORIES

A. SUMMARY OF SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts which cannot be avoided. Specifically, Section 15126.2(b) states:

> "*Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reason why the project is being proposed, notwithstanding their effect, should be described."*

Based on the analysis contained in this Draft EIR and the Initial Study included in Appendix A, implementation of the proposed project would result not result in significant unavoidable environmental impacts for the majority of impact areas. The project would create significant unavoidable impact to greenhouse gas emissions. Furthermore, the project would create cumulatively considerable impacts to greenhouse gas emissions.

B. GROWTH INDUCING IMPACTS OF THE PROPOSED PROJECT

Section 15126.2(d) of the CEQA Guidelines requires a discussion of the ways in which a proposed action could be growth inducing. This includes ways in which the project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Section 15126.2(d) of the CEQA Guidelines reads as follows:

> "*Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some project which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment."*

There are two types of growth-inducing impacts that a project may have: direct and indirect. To assess the potential for growth-inducing impacts, the project's characteristics that may encourage and facilitate activities that individually or cumulatively may affect the environment must be evaluated (CEQA Guidelines Section 15126.2(d)).

Direct growth-inducing impacts occur when the development of a project imposes new burdens on a community by directly inducing population growth, or by leading to the construction of additional developments in the same area. Also included in this category are projects that remove physical obstacles to population growth (such as a new road into an undeveloped area or a wastewater treatment plant with excess capacity that could allow additional development in the service area). Construction of these types of infrastructure projects cannot be considered isolated from the development they facilitate and serve. Projects that physically remove obstacles to growth, or projects that indirectly induce growth may provide a catalyst for future unrelated development in an area such as a new residential community that requires additional commercial uses to support residents.

The proposed project would add short-term employment opportunities provided during the construction phase of the project. Using a standard commercial employment rate of 1 employee/500 square feet, the proposed project is estimated to create as many as 890 new long-term jobs. The California Employment Development Department estimated that there were 6,600 unemployed persons in Butte County as of May 2016. Of this figure, an estimated 2,600 unemployed persons are in Chico. Thus, there is adequate capacity in the local labor market to fill the proposed project's new employment opportunities such that it would be unlikely that substantial growth inducement would occur.

As the proposed project includes residential development, it can be estimated that the proposed project would increase population by approximately 1,928 people through the addition of the single and multi-family units proposed. The project would create 733 units to provide housing for the growing population of the City of Chico. BCAG forecasts that an additional 7,039 dwelling units, low scenario, would be required to sustain growth by 2030. The General Plan also predicted that 16,376 additional dwelling units would be required by 2030. The project would contribute only a portion, approximately 10.4% of the BCAG prediction and 4.47% of the General Plan projection, of the predicted housing needs. As the proposed project would not exceed the City's population projections, no significant population or housing impacts would be created by the project. In addition, as the proposed project includes mixed use, commercial and office uses as well, the proposed project would not require additional development to support this new residential community. As discussed below, the proposed project would not induce growth in an area that is not already developed with infrastructure to accommodate such growth.

While the proposed project would include expand and utilize existing infrastructure, infrastructure would not be provided beyond what is necessary to serve the proposed project. As such, indirect impacts, including the extension of roads or other infrastructure, would not be anticipated to induce substantial population growth in the area that would otherwise not have occurred as rapidly or in as great a magnitude. Therefore, impacts would be less than significant and no mitigation measures are required. Further, the proposed project would be adequately served by existing public services such as fire/emergency and police services in the vicinity of the project site. Therefore, the project would not result in significant growth inducing impacts.

C. ENERGY CONSERVATION

Public Resources Code Section 21100(b)(3) and *Section 15126.4 of the CEQA Guidelines* require EIRs to describe, where relevant, the wasteful, inefficient, and unnecessary consumption of energy caused by a project. In 1975, largely in response to the oil crisis of the 1970s, the State Legislature adopted Assembly Bill (AB) 1575, which created the California Energy Commission (CEC). The statutory mission of the CEC is to forecast future energy needs, license thermal power plants of 50 megawatts or larger, develop energy technologies and renewable energy resources, plan for and direct State responses to energy emergencies, and—perhaps most importantly—promote energy efficiency through the adoption and enforcement of appliance and building energy efficiency standards. AB 1575 also amended Public Resources Code Section 21100(b)(3) to require EIRs to consider the wasteful, inefficient, and unnecessary consumption of energy caused by a project. Thereafter, the State Resources Agency created Appendix F of the CEQA Guidelines. Appendix F is an advisory document that assists EIR preparers in determining whether a project will result in the inefficient, wasteful, and unnecessary consumption of energy. For the reasons set forth below and in Section IV.P (Utilities and Service Systems), this EIR concludes that the proposed project would not result in the wasteful, inefficient, and unnecessary consumption of energy, would not cause the need for additional natural gas or electrical energy producing facilities, and, therefore, would not create a significant impact on energy resources.

Regulatory Setting

Federal and state agencies regulate energy use and consumption through various means and programs. At the federal level, the United States Department of Transportation, the United States Department of Energy, and the United States Environmental Protection Agency (EPA) are three federal agencies with substantial influence over energy policies and programs. Generally, federal agencies influence and regulate transportation energy consumption through establishment and enforcement of fuel economy standards for automobiles and light trucks, through funding of energy related research and development projects, and through funding for transportation infrastructure improvements. At the state level, the CPUC and the CEC are two agencies with authority over different aspects of energy. The CPUC regulates privately owned utilities in the energy, rail, telecommunications, and water fields. The CEC collects and analyzes energy-related data, prepares statewide energy policy recommendations and plans, promotes and funds energy efficiency programs, and adopts and enforces appliance and building energy efficiency standards. California is exempt under federal law from setting state fuel economy standards for new on-road motor vehicles. Some of the more relevant federal and state energy-related laws and plans are discussed below.

Federal Regulations

Energy Policy Act of 2005

Passed by Congress in July 2005, the Energy Policy Act includes a comprehensive set of provisions to address energy issues. The act includes tax incentives for the following: energy

conservation improvements in commercial and residential buildings; fossil fuel production and clean coal facilities; and construction and operation of nuclear power plants, among other things. Subsidies are also included for geothermal, wind energy, and other alternative energy producers. It directs the USDOE to study and report on alternative energy sources such as wave and tidal power, and includes funding for hydrogen research. The Act also increases the amount of ethanol required to be blended with gasoline, and extends daylight saving time (to begin earlier in spring and end later in fall) to reduce lighting requirements. It also requires the federal vehicle fleet to maximize use of alternative fuels. The Act further includes provisions for expediting construction of major energy transmission corridors, such as high-voltage power lines, and fossil fuel transmission pipelines. These are just a few examples of the provisions contained in the Act.[1]

Energy Independence and Security Act of 2007

Signed into law in December 2007, this broad energy bill included an increase in auto mileage standards, and also addressed biofuels, conservation measures, and building efficiency. The U.S. EPA administers the Corporate Average Fuel Economy (CAFE) program, which determines vehicle manufacturers' compliance with existing fuel economy standards. The bill amended the CAFE standards to mandate significant improvements in fuel efficiency (i.e., average fleet wide fuel economy of 35 miles per gallon by 2020, versus the previous standard of 27.5 mpg for passenger cars and 22.2 mpg for light trucks).[2]

Another provision includes a mandate to increase use of ethanol and other renewable fuels by 36 billion gallons by 2022, of which 21 million gallons is to include advanced biofuels, largely cellulosic ethanol, that have 50 to 60 percent lower GHG emissions. The bill also includes establishment of a new energy block grant program for use by local governments in implementing energy-efficiency initiatives, as well as a variety of green building incentives and programs, among other things.[3]

Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA)

The Intermodal Surface Transportation Efficiency Act of 1991 ("ISTEA") promoted the development of inter-modal transportation systems to maximize mobility as well as address national and local interests in air quality and energy. ISTEA contained factors that MPOs such as BCAG were required to address in developing transportation plans and programs, including some energy-related factors. To meet the new ISTEA requirements, MPOs adopted explicit policies defining the social, economic, energy, and environmental values that were to guide transportation decisions in that metropolitan area. The planning process for specific projects would then address these policies. Another requirement was to consider the consistency of transportation planning with federal, state, and local energy goals. Through this requirement,

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[1] *United States Congress, Energy Policy Act of 2005 (Public Law 109-58), passed July 29, 2005. https://www.congress.gov/bill/109th-congress/house-bill/6*

[2] *EPA. 2007. Summary of the Energy Independence and Security Act. Available online at: https://www.epa.gov/laws-regulations/summary-energy-independence-and-security-act*

[3] *Ibid*

energy consumption was expected to become a decision criterion, along with cost and other values that determine the best transportation solution.

Transportation Equity Act for the 21st Century

The Transportation Equity Act for the 21st Century ("TEA-21") was signed into law in 1998 and builds upon the initiatives established in the ISTEA legislation discussed above. TEA-21 authorizes highway, highway safety, transit, and other efficient surface transportation programs. TEA-21 continues the program structure established for highways and transit under ISTEA, such as flexibility in the use of funds, emphasis on measures to improve the environment, and focus on a strong planning process as the foundation of good transportation decisions. TEA-21 also provides for investment in research and its application to maximize the performance of the transportation system through, for example, deployment of Intelligent Transportation Systems, to help improve operations and management of transportation systems and vehicle safety.

State Regulations

Energy Action Plan

In 2003, the three key energy agencies in California— the CEC, the California Power Authority ("CPA"), and the CPUC— jointly adopted an Energy Action Plan ("EAP") that listed goals for California's energy future and set forth a commitment to achieve these goals through specific actions. In 2005, the CPUC and the CEC jointly prepared the EAP II to identify the further actions necessary to meet California's future energy needs. EAP II describes the priority sequence for actions to address increasing energy needs, also known as "loading order." The loading order identifies energy efficiency and demand response as the state's preferred means of meeting growing energy needs. After cost-effective efficiency and demand response, the state is to rely on renewable sources of power and distributed generation, such as combined heat and power applications. To the extent that efficiency, demand response, renewable resources, and distributed generation are unable to satisfy increasing energy and capacity needs, the EAP II supports the use of clean and efficient fossil-fired generation. The plan recognizes that concurrent improvements are required to the bulk electricity transmission grid and distribution facility infrastructure to support growing demand centers and the interconnection of new generation, both on the utility and customer side of the meter. The EAP II identifies key actions to be taken in all of these areas in order to meet the state's growing energy requirements. The plan recommendations are implemented by the governor through executive orders, by the legislature through new statutes, and by the responsible state agencies through regulations and programs. Progress on EAP II implementation is reported in successive biennial updates of the plan.[4]

[4] *State of California, Energy Commission and Public Utilities Commission, "Energy Action Plan II – Implementation Roadmap for Energy Policies," September 21, 2005. http://www.energy.ca.gov/energy_action_plan/2005-09-21_EAP2_FINAL.PDF*

Title 24 (California Energy Code)

The California Energy Code (Title 24, Part 6, of the California Code of Regulations, California's Energy Efficiency Standards for Residential and Nonresidential Buildings), provides energy conservation standards for all new and renovated commercial and residential buildings constructed in California. The provisions of the California Energy Code apply to the building envelope, space-conditioning systems, and water-heating and lighting systems of buildings and appliances; they also give guidance on construction techniques to maximize energy conservation. Minimum efficiency standards are given for a variety of building elements, including appliances; water and space heating and cooling equipment; and insulation for doors, pipes, walls, and ceilings. The CEC adopted the 2005 changes to Building Efficiency Standards, which emphasized saving energy at peak periods and seasons, and improving the quality of installation of energy-efficiency measures. It is estimated that implementation of the 2005 Title 24 standards have resulted in an increased energy savings of 8.5 percent relative to the previous Title 24 standards. Compliance with Title 24 standards is verified and enforced through the local building permit process.[5] The 2008 Title 24 Standards, which had an effective date beginning August 1, 2009, include added provisions that require, for example, "cool roofs" on commercial buildings; increased efficiency in heating, ventilating, and air conditioning systems; and increased use of skylights and more efficient lighting systems.[6] Title 24 Standards were further updated with the 2013 Building Energy Efficiency Standards, which are estimated to lead to 25 percent less energy consumption for residential buildings and 30 percent savings for nonresidential buildings over 2008 Energy Standards. 2013 standards, which updated codes for lighting, space heating and cooling, ventilation, and water heating, took effect on July 1st 2014.

California Green Building Standards Code

All new construction must adhere to the California Green Building Standards Code (CCR, Title 24, Part 11) in place at the time of construction. As an example, the 2013 Title 24 California Green Building Standards, referred to as CALGreen:

- Sets a threshold of a 20 percent reduction in indoor water use and includes voluntary goals for reductions of 30 percent, 35 percent and 40 percent.
- Requires separate meters for indoor and outdoor water use at nonresidential buildings; and at those sites, irrigation systems for larger landscaped areas must be moisture-sensing.
- Calls for 50 percent of construction waste to be diverted from the landfills and lists higher, voluntary diversion amounts of 65 percent to 75 percent for new homes, and 80 percent for commercial construction.

[5] *California Energy Commission (2016) Web site (Building Efficiency Standards), http://www.energy.ca.gov/title24*
[6] *Ibid.*

- Mandates inspections of energy systems -- such as the heat furnace, air condition and mechanical equipment -- for nonresidential buildings that are larger than 10,000 square feet to "ensure that all are working at their maximum capacity according to design efficiencies."
- Requires that paint, carpet, vinyl flooring, particle board and other interior finish materials be low-emitting in terms of pollutants.

Senate Bill X1 2

SB X1 2, enacting the California Renewable Energy Resources Act, expands the Renewable Portfolio Standard by establishing a goal of 20 percent of the total electricity sold to retail customers in California per year from renewable sources by December 31, 2013, and 33 percent by December 31, 2020, and in subsequent years. Under the bill, a renewable electrical generation facility is one that uses biomass, solar thermal, photovoltaic, wind, geothermal, fuel cells using renewable fuels, small hydroelectric generation of 30 megawatts or less, digester gas, municipal solid waste conversion, landfill gas, ocean wave, ocean thermal, or tidal current, and that meets other specified requirements with respect to its location. In addition to the retail sellers covered by SB 107, SB X1 2 adds local publicly owned electric utilities to the Renewable Portfolio Standard. The CPUC has established the quantity of electricity products from eligible renewable energy resources to be procured by retail sellers in order to achieve targets of 20 percent by December 31, 2013; 25 percent by December 31, 2016; and 33 percent by December 31, 2020. The Act also requires that the governing boards for local publicly owned electric utilities establish the same targets, and the governing boards are responsible for ensuring compliance with these targets. The CPUC is responsible for enforcement of the Renewable Portfolio Standard for retail sellers, while the CEC and California Air Resources Board (CARB) will enforce the requirements for local publicly owned electric utilities.

Executive Order S-3-05

EO S-3-05 was signed by the Governor on June 1, 2005. EO S-3-05 established the following statewide emission reduction targets:

- Reduce GHG emissions to 2000 levels by 2010,
- Reduce GHG emissions to 1990 levels by 2020, and
- Reduce GHG emissions to 80 percent below 1990 levels by 2050.

EO S-3-05 created a Climate Action Team (CAT) headed by Cal EPA and including several other state agencies. The CAT is tasked by EO S-3-05 with implementing the global warming emission reduction programs identified in the Climate Action Plan and to report on the progress made toward meeting the emission reduction targets established in the EO.

The first report to the Governor and the Legislature was released in March 2006 and will be issued bi-annually thereafter. The 2006 CAT report to the Governor contains recommendations and strategies to help ensure the targets in EO S-3-05 are met (Cal EPA, 2006). Subsequent CAT reports discussed the progress and supplemental recommendations to ensure the targets

of EO S-3-05. The 2010 CAT Report to the Governor and the Legislature was issued in December 2010.[7]

Executive Order B-30-15

EO B-30-15 was signed by the Governor on April 29, 2015. EO B-30-15 established a California GHG reduction target of 40 percent below 1990 levels by 2030. This intermediate GHG emissions reduction target will make it possible to meet the ultimate GHG emissions reduction target of 80 percent below 1990 levels by 2050, as established in EO S-3-05.

California Global Warming Solutions Act of 2006

In September 2006, the governor signed AB 32, the Global Warming Solutions Act of 2006, which mandates that California's GHG emissions be reduced to 1990 levels by 2020. The act directs the California EPA to work with state agencies to implement a cap on GHG emissions (primarily carbon dioxide) from stationary sources of such as electric power generation facilities, and industrial, commercial, and waste-disposal sectors. Since carbon dioxide emissions are directly proportional to fossil fuel consumption, the cap on emissions is expected to have the incidental effect of forcing a reduction in fossil fuel consumption from these stationary sources. Specifically, AB 32 directs the California EPA to work with other state agencies to accomplish the following: 1) promulgate and implement GHG emissions cap for the electric power, industrial, and commercial sectors through regulations in an economically efficient manner; 2) institute a schedule of greenhouse gas reductions; 3) develop an enforcement mechanism for reducing GHG; 4) establish a program to track and report GHG emissions.[8]

Senate Bill 350

SB 350, the Clean Energy and Pollution Reduction Act, was signed by the Governor on October 7, 2015 requiring the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased to 50% by December 31, 2030. This bill would require the State Energy Resources Conservation and Development Commission to establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas final end uses of retail customers by January 1, 2030. The bill would require the Public Utilities Commission to establish efficiency targets for electrical and gas corporations consistent with this goal. The bill would require local publicly owned electric utilities to establish annual targets for energy efficiency savings and demand reduction consistent with this goal.

Senate Bill 32

SB 32, the Global Warming Solutions Act, provides an update to the California Global Warming Solutions Act of 2006 and would require the state board to ensure that statewide greenhouse gas emissions are reduced to 40% below the 1990 level by 2030.

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[7] *Cal EPA. 2010. Climate Action Team Report to Governor Schwarzenegger and the California Legislature. December 2010. Available online at: http://climatechange.ca.gov/climate_action_team/reports/index.html#2006.*

[8] *Assembly Bill 32, Passed August 31, 2006, http://www.arb.ca.gov/cc/docs/ab32text.pdf.*

Local Regulations

In addition to the federal and state regulations and guidelines, the following is a synopsis of local regulations and goals relative to reducing or avoiding significant impacts on energy use.

City of Chico General Plan

Mayor's Climate Protection Agreement (2006) - In 2006, Chico's Mayor signed the U.S. Conference of Mayor's Climate Protection Agreement, adding Chico to a group of over 600 cities united in pledging to reduce greenhouse gas emissions. This milestone led to the creation of the Sustainability Task Force, a committee that provides input to the City Council on sustainability issues. An early effort of the Task Force was to conduct an inventory of greenhouse gases.

Greenhouse Gas Emissions Inventory (2008) - The Greenhouse Gas Emissions Inventory measured the amount of heat-trapping gases that the community released to the atmosphere in the baseline year 2005. By quantifying emissions, this inventory established a benchmark against which emissions reductions can be measured. The inventory will be updated to measure emission changes over time, which helps guide the management of reduction strategies and policies. Also in 2008, the City Council approved a specific greenhouse gas emissions reduction target of 25 percent below 2005 levels by the year 2020.

Chico Climate Action Plan (2011) - The City will maintain a Climate Action Plan (CAP) that identifies programs and actions to reduce greenhouse gas emissions to meet the Council's greenhouse gas reduction goal. Specifically, the CAP identifies the sources of greenhouse gas emissions and the sectors such as transportation, energy, and waste to be targeted for emissions reductions, and it provides emission reduction goals and strategies with an associated timeline and budget.

Energy Requirements of the Proposed Project

Short-term construction and long-term operational energy consumption are discussed below.

Short-Term Construction

The United States Environmental Protection Agency (EPA) regulates nonroad diesel engines that power both mobile equipment (e.g., bulldozers, scrapers, front end loaders, etc.) and stationary equipment (e.g., generators, pumps, compressors, etc.). The EPA has no formal fuel economy standards for nonroad (e.g., construction) diesel engines but does regulate diesel emissions, which indirectly affects fuel economy. In 1994, EPA adopted the first set of emission standards ("Tier 1") for all new nonroad diesel engines greater than 37 kilowatts (kW [50 horsepower]). The Tier 1 standards were phased in for different engine sizes between 1996 and 2000, reducing nitrogen oxide (NOx) emissions from these engines by 30 percent. Subsequently, the EPA adopted more stringent emission standards for NOx, hydrocarbons, and particulate matter from new nonroad diesel engines. This program included the first set of standards for nonroad diesel engines less than 37 kW. It also phased in more stringent "Tier 2" emission standards from 2001 to 2006 for all engine sizes and added yet more stringent "Tier 3"

standards for engines between 37 and 560 kW (50 and 750 horsepower) from 2006 to 2008. These standards further reduced nonroad diesel engine emissions by 60 percent for NOx and 40 percent for particulate matter (PM) from Tier 1 emission levels. In 2004, EPA issued the Clean Air Nonroad Diesel Rule. This rule cut emissions from nonroad diesel engines by more than 90 percent, and was phased in between 2008 and 2014. These emission standards are intended to promote advanced clean technologies for nonroad diesel engines that improve fuel combustion, but they also result in slight decreases in fuel economy.

The proposed project would entail short-term construction activities that would consume energy, primarily in the form of diesel fuel (e.g., mobile construction equipment) and electricity (e.g., power tools). Construction activities would be subject to applicable regulations such as anti-idling measures, limits on duration of activities, and the use of alternative fuels, thereby reducing energy consumption.

There are no unusual project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in other parts of the State. Therefore, it is expected that construction fuel consumption associated with the proposed project would not be any more inefficient, wasteful, or unnecessary than at other construction sites in the region.

Long-Term Operations

Transportation Energy Demand

Vehicle fuel efficiency is regulated at the federal level. Pursuant to the Federal Energy Policy and Conservation Act of 1975, the National Highway Traffic Safety Administration (NHTSA) is responsible for establishing additional vehicle standards and for revising existing standards. As of December 2014, NHTSA indicated that the fuel economy of passenger vehicles averaged 34.2 miles per gallon and light trucks averaged 26.2 miles per gallon. The proposed development is projected to generate approximately 6,054 gross daily trips for residential land uses and 23,566 gross daily trips for commercial land uses. The population of the project area is estimated to be 139,713 by the year 2030 according to the 2030 General Plan. The proposed project is generally consistent with the General Plan as the designations for the site would still permit, residential, commercial, and open space uses. Although the project proposes to reconfigure the location of these designations, the only land use designation that would be removed would be the existing Office Mixed Use that would be replaced with Commercial Mixed Use. Therefore, the proposed project is consistent with regional growth projections in the area based on land use designations, including increased vehicle trips, and would not constitute an unnecessary or wasteful source of energy consumption.

Building Energy Demand

Pacific Gas and Electric Company (PG&E) provides electricity to all or parts of 47 counties that comprise Northern California, including the City of Chico. PG&E obtains electricity from a variety of sources including its own generation plants and purchased power from outside

sources. The project can promote building energy efficiency through compliance with energy efficiency standards and energy efficiency measures that exceed required standards.

As discussed in Section IV.P (Utility and Service Systems), the proposed project is estimated to consume 13,210,337 kWh of electricity and 40,216,000 cubic feet of natural gas on an annual basis, less than a 0.02% increase of PG&E's annual usage. All new development would be subject to the latest adopted edition of the Title 24 energy efficiency standards, which are among the most stringent in the United States. As such, the proposed project would not result in the unnecessary, wasteful, or inefficient use of energy.

D. SIGNIFICANT IRREVERSIBLE CHANGES TO THE ENVIRONMENT

Section 15126.2(c) of the CEQA Guidelines states that significant irreversible environmental changes associated with a proposed project shall be discussed, including the following:

- *Uses of nonrenewable resources during the initial and continued phases of the project that may be irreversible because a large commitment of such resources makes removal or nonuse thereafter unlikely;*
- *Primary impacts and, particularly, secondary impacts (such as highway improvement that provides access to a previously inaccessible area), which generally commit future generations to similar uses; and*
- *Irreversible damage that could result from environmental accidents associated with the project.*

The project would permanently occupy the primary scenic vista of the Sierra Nevada foothills available from Bruce Road and would commit future generations to a close up view of the project. See Section IV.B (Aesthetics) for an in-depth discussion regarding impacts to Aesthetics.

Construction of the proposed project would require the use of nonrenewable resources (i.e., wood, metals, sand, gravel, fossil fuels) for building materials and to fuel construction vehicles and equipment. Subsequent use and maintenance of the project would also require the long-term consumption of these nonrenewable resources at reduced levels.

The project would use common cleaning and maintenance materials, which would be shipped, stored, used and disposed of in accordance with applicable regulations. Otherwise, the proposed project would not involve the routine use, transport, or disposal of hazardous materials. During project construction the project would be required to follow all applicable requirements to ensure safe use, storage and disposal of any hazardous materials or wastes that could be used. For these reasons, the project would not result in any significant hazards to the public or the environment through the routine transport, use or disposal of hazardous materials, or through upset or accident conditions. See Section IV.H (Hazards and Hazardous Materials) for an in-depth discussion regarding impacts for Hazards and Hazardous Materials.

Implementation of the project would increase the amount of activity on the site, which would increase the likelihood of environmental accidents, such as fire on the site. However, federal and state safety regulations, as well as local compliance monitoring by the City of Chico Fire Department would limit the potential for irreversible environmental damage caused by fire.