



# Town of Paradise Planning Commission Special Meeting Agenda 6:00 PM – May 24, 2022

**Town of Paradise Council Chamber – 5555 Skyway, Paradise, CA**

**Planning Commission Staff:**

Susan Hartman, Community Development Director

**Planning Commission Members:**

Carissa Garrard, Chair  
Ron Lassonde, Vice Chair  
Lynn Costa, Commissioner  
Kim Morris, Commissioner  
Zeb Reynolds, Commissioner

In accordance with the Americans with Disabilities Act, if you need a special accommodation to participate, please contact Community Development Director Hartman, at 872-6291 ext. 417 at least 48 hours in advance of the meeting. Hearing assistance devices for the hearing impaired are available from the Presiding Clerk. Members of the public may address the Planning Commission on any agenda item. If you wish to address the Planning Commission on any matter on the Agenda, it is requested that you complete a "Request to Address Council/Commission" card and give it to the Presiding Clerk prior to the beginning of the Meeting. All writings or documents which are related to any item on an open session agenda and which are distributed to a majority of the Planning Commission within 72 hours of a Regular Meeting will be available for public inspection at the Town Hall in the Town Clerk or Community Development Services Department located at 5555 Skyway, at the time the subject writing or document is distributed to a majority of the subject body. Regular business hours are Monday through Thursday from 8:00 a.m. to 5:00 p.m.

## CALL TO ORDER

## PLEDGE OF ALLEGIANCE TO THE FLAG OF THE UNITED STATES OF AMERICA

## ROLL CALL

### 1. PUBLIC HEARING

#### \*\*\* PUBLIC HEARING PROCEDURE \*\*\*

- |                                   |                                |
|-----------------------------------|--------------------------------|
| A. Staff comments                 | C. Close hearing to the public |
| B. Open the hearing to the public | D. Commission discussion       |
| 1. Project applicant              | E. Motion                      |
| 2. Parties for the project        | F. Vote                        |
| 3. Parties against the project    |                                |
| 4. Rebuttals                      |                                |

**NOTE:** Pursuant to Planning Commission Resolution No. 96-001, any person may speak before the Commission regarding the matter under consideration for **a maximum of five minutes** unless granted additional time by the Chair. "In accordance with the Americans with Disabilities Act, if you need a special accommodation to participate, please contact the Community Development Dept., at 872-6291 at least 48 hours in advance of the meeting."

- 1a. 1. Conduct the duly noticed and scheduled public hearing regarding the proposed Town of Paradise Housing Element 2022 update; and,

2. Consider adopting Planning Commission Resolution No. 2022-02, thereby recommending that the Town Council take the following actions: a) Certify and adopt the proposed Initial Study and Negative Declaration document as it relates to the proposed Town of Paradise Housing Element 2022 Update, and b) Adopt the amendments to the Housing (2022-2030 Housing Element) of the 1994 Paradise General Plan known as the Town of Paradise Housing Element 2022 Update in order to make the Paradise Housing Element consistent with the RHNA and current State housing element law. (ROLL CALL VOTE)

2. ADJOURNMENT

STATE OF CALIFORNIA ) COUNTY OF BUTTE )	SS.
I declare under penalty of perjury that I am employed by the Town of Paradise in the Town Clerk's Department and that I posted this Agenda on the bulletin Board both inside and outside of Town Hall on the following date:	
<hr/>	
TOWN/ASSISTANT TOWN CLERK SIGNATURE	





**Town of Paradise**  
**Planning Commission Agenda Summary**      **Agenda Item: 1(a)**  
**Date: May 24, 2022**

**ORIGINATED BY:** Susan Hartman, Community Development  
Director – Planning & Wastewater

**REVIEWED BY:** Kevin Phillips, Town Manager

**SUBJECT:** Review the Final Revised 2022-2030 Housing Element Update and Consider Adoption of a Resolution Recommending Town Council Adoption of a Town of Paradise 2022-2030 Housing Element Update and Certification of its Associated Negative Declaration Environmental Document

**COMMISSION ACTION REQUESTED:**

1. Conduct the duly noticed and scheduled public hearing regarding the proposed Town of Paradise Housing Element 2022 update; and, 2. Consider adopting Planning Commission Resolution No. 2022-02, thereby recommending that the Town Council take the following actions: a) Certify and adopt the proposed Initial Study and Negative Declaration document as it relates to the proposed Town of Paradise Housing Element 2022 Update, and b) Adopt the amendments to the Housing (2022-2030 Housing Element) of the 1994 Paradise General Plan known as the Town of Paradise Housing Element 2022 Update in order to make the Paradise Housing Element consistent with the RHNA and current State housing element law. (ROLL CALL VOTE)

**Background:**

The Housing Element is one of seven mandatory elements that comprise a local agency's General Plan according to Section 65302(c) of the California Government Code. The Housing Element is considered to be the primary policy document for a community to guide the development, rehabilitation and preservation of its housing for all economic segments of the local population.

In February 2021, Urban Planning Partners, Inc. (UPP) was selected as the Town's consultant and began the process of reviewing the 2014-2022 Housing Element, collecting, and analyzing housing data such as population, housing and employment characteristics, the regional allocation of housing units, the characteristics of the housing market, and the housing needs of special populations to begin the preparation of the 2022-2030 Housing Element.

On December 3, 2021, the Public Draft Housing Element was made available for public review and comment with written comments being accepted through 5:00 p.m., January 4, 2022. Only grammatical corrections/typos were received from the public during that timeframe.

On January 18, 2022, the Draft Housing Element was forwarded to the State Dept of Housing & Community Development (HCD) for their initial 90-day review. A virtual meeting was conducted

with HCD staff regarding their preliminary review worksheet on March 18, 2022. As a result of that conversation, additional information was provided to HCD for their housing element review. Their final draft comments were received by staff on April 18, 2022. Two subsequent virtual meetings were held with HCD to review the comments in detail before beginning on the additional data analysis required in order to secure final certification of the Housing Element from HCD.

On April 15, 2022, the 30-day review period began for the Initial Study and Negative Declaration which was noticed in the newspaper and uploaded to the State Clearinghouse. The Initial Study & Negative Declaration covered both the Housing Element & the Safety Element Updates (still in initial review with Cal Fire). Comments were accepted until 12:00 p.m. on Monday May 16, 2022. There were no comments received from the public.

### **Analysis:**

The draft housing element letter from HCD staff, received on April 18, 2022, indicated that the draft 2022-2030 Housing Element update would meet the statutory requirements of State Housing Element law with the additional analysis and program timeframe updates requested. Therefore, a final version of the Housing Element update is being presented to the Planning Commission, incorporating those items, for consideration and a recommendation to the Town Council for its adoption. Upon adoption, the Final Housing Element will be submitted to HCD for final certification.

Attached with the staff report for your review and consideration are copies of 1) the proposed final Town of Paradise 2022-2030 Housing Element Update and 2) its related proposed Initial Study and Negative Declaration document dated April 2022. In addition, a Planning Commission Resolution and several other documents are attached for your review and consideration.

### **Financial Impact:**

There is no financial impact to the Town's General Fund to adopt a Resolution recommending Town Council adoption of the 2022-2030 Housing Element Update and associated Negative Declaration environmental document. If ultimately adopted by the Town Council, the cost associated with filing the Notice of Determination with the County Clerk for the Negative Declaration will be paid for out of the General Plan Update fund.

### **Attachments:**

- Notice of the Planning Commission meeting of May 24, 2022.
- Notice of Intent to Adopt a Negative Declaration/Initial Study for the Housing & Safety Elements.
- Planning Commission Resolution No. 2022-02.
- Initial Study and Negative Declaration environmental document.
- Final Adoption Draft of the Town of Paradise Updated 2022-2030 Housing Element.

**NOTICE OF PUBLIC HEARING  
PARADISE PLANNING COMMISSION**

**NOTICE IS HEREBY GIVEN** BY THE Paradise Planning Commission that a public hearing will be held on **May 24, 2022 at 6:00 p.m.** in the Paradise Town Council Chambers at Paradise Town Hall located at 5555 Skyway, Paradise, CA regarding the matter described below:

a. Item for which a Negative Declaration is proposed to be adopted

**Town of Paradise Housing Element Update** – The Planning Commission will hold a public hearing regarding the proposed Final Town of Paradise General Plan Housing Element update. The updated Housing Element is intended to address the housing needs of the Town of Paradise from 2022 to 2030. The State of California requires periodic updates of Housing Elements to address the necessary conditions for developing and preserving an adequate supply of housing for all income categories. The proposed Final Housing Element update analyzed the post-fire housing needs of the Town and aimed to develop goals, policies, and programs which create a more wildfire resilient housing inventory. It is the intent of Town staff to seek Town Council adoption of the updated Housing Element by June 15, 2022, and subsequently submit the adopted 2022-2030 Housing Element Update to the California State Department of Housing and Community Development for final certification.

The draft Housing Element and associated environmental document can be found online at <https://www.townofparadise.com/planning/page/housing-element-2022> or a public view copy is available at the Building Resiliency Center located at 6295 Skyway. If you challenge this project in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence delivered to the Paradise Planning Commission at, or prior to, the public hearing. For further information please contact the Planning Division at (530) 872-6291, extension 424.

Susan Hartman  
Community Development Director

## TOWN OF PARADISE

Date: April 13, 2022

### **Notice of Intent to Adopt a Negative Declaration/Initial Study for the Paradise Housing Element & Safety Element Update Projects**

NOTICE IS HEREBY GIVEN by the Planning Director that a public hearing will be held on Tuesday, May 24, 2022 at 6:00 p.m. in the Town Hall Council Chambers, 5555 Skyway, Paradise, California, regarding the following project:

<b>Lead Agency:</b>	Town of Paradise 5555 Skyway Paradise, CA 95969
<b>Project Title:</b>	<b>Town of Paradise Housing Element Update</b>
<b>Project Location:</b>	The Town of Paradise is located in north central Butte County where the western slopes of the Cascade and Sierra Nevada ranges meet. The topography in the area is composed of mostly steeper canyons from the major drainages. The Town is situated at an elevation of between 1,500 and 2,200 feet.
<b>Project Description:</b>	The Town of Paradise Housing Element update would revise the Town's Housing Element consistent with the requirements of state law.
<b>Findings/Determination:</b>	The Town has reviewed and considered the proposed project and has determined that the project will not have a significant effect on the environment, with substantial supporting evidence provided in the Initial Study. The Town hereby prepares and proposes to adopt a Negative Declaration for this project.
<b>Public Review Period:</b>	A 30-day public review period for the Negative Declaration/ Initial Study, which covers both the Housing Element & Safety Element updates, commenced on April 15, 2022 and will end on May 15, 2022 for interested individuals and public agencies to submit written comments on the document. Written comments on the Initial Study/ Negative Declaration should be sent to the attention of Susan Hartman, Community Development Director and must be received at 5555 Skyway, Paradise, CA 95969 by 12:00 PM on May 16, 2022. Copies of the Negative Declaration/Initial Study and the draft Town of Paradise Housing Element Update are available for review at the Town of Paradise Building Resiliency Center at 6295 Skyway, Paradise, CA 95969 or online at <a href="http://www.townofparadise.com/planning/page/housing-element-2022">www.townofparadise.com/planning/page/housing-element-2022</a> .

**PARADISE PLANNING COMMISSION  
RESOLUTION NO. 2022-02**

**A RESOLUTION OF THE PLANNING COMMISSION OF THE TOWN OF PARADISE  
RECOMMENDING TOWN COUNCIL ADOPTION OF THE TEXT AMENDMENT TO THE HOUSING  
ELEMENT (2022-2030 HOUSING ELEMENT) OF THE 1994 PARADISE GENERAL PLAN (Town of  
Paradise Housing Element 2022 Update)**

**WHEREAS**, on December 10, 2020, the Butte County Association of Governments (BCAG) adopted the Butte County Regional Housing Needs Plan (RHNP): December 31, 2021 – June 15, 2030, establishing a housing allocation for the Town of Paradise that needs to be incorporated and appropriately addressed within the Housing Element of the 1994 Paradise General Plan, and;

**WHEREAS**, existing State housing element law requires the Town of Paradise to amend the Housing Element of its 1994 Paradise General Plan not only to make it consistent with the RHNP but also to become consistent with changes to State housing element law adopted from 2014 to 2022; and

**WHEREAS**, it is in the best interests of the Paradise citizenry that the 1994 Paradise General Plan include a Housing Element that is updated to be consistent with the RHNP and that has been determined by the State Department of Housing and Community Development (HCD) to be in compliance with State housing element law; and

**WHEREAS**, town staff with the assistance of a planning consultant hired by the Town of Paradise has generated a proposed 1994 Paradise General Plan amendment document (Housing Element 2022 Update) that proposes adoption of the 2022-2030 Housing Element as a text amendment to the 2014-2022 Housing Element in order to make it consistent with the RHNP and in compliance with current State housing element law; and

**WHEREAS**, the proposed 2022-2030 Housing Element has been circulated for review by the public and HCD consistent with the requirements of State housing element law; and

**WHEREAS**, the Town of Paradise determined that the Housing Element Update was subject to the California Environmental Quality Act (CEQA) and circulated a Notice of Intent to Adopt a Negative Declaration for the Housing Element and an Initial Study for public review; and

**WHEREAS**, the Paradise Planning Commission has conducted a public hearing, pursuant to California planning and zoning law concerning a proposed amendment to the 2014-2022 Housing Element text of the 1994 Paradise General Plan; and

**WHEREAS**, such public hearing also included review of potential environmental impacts associated with said amendment to the Paradise General Plan, pursuant to the requirements of the California Environmental Quality Act (CEQA); and

**TOWN OF PARADISE  
PARADISE PLANNING COMMISSION  
RESOLUTION NO. 2022-02**

**WHEREAS**, California Government Code Sections 65353 and 65354 require the Planning Commission to conduct a public hearing and notify the Town Council in writing of its recommendation; and

**WHEREAS**, the Planning Commission has considered the analysis and recommendations of town staff; has considered the 2022-2030 Housing Element, as revised in response to recent comments received from the State Department of Housing and Community Development; and has considered comments made at a public hearing conducted by the Planning Commission; and on the basis thereof has determined pursuant to Government Code Section 65358 that a certain amendment to the 1994 Paradise General Plan that would replace the 2014-2022 Housing Element with the 2022-2030 Housing Element in order to attain compliance consistency with the RHNP as well as with current State housing element law is not only in the public interest but also would be internally consistent with the remainder of the Paradise General Plan.

**NOW, THEREFORE, BE IT RESOLVED BY THE PARADISE PLANNING COMMISSION AS FOLLOWS:**

**SECTION 1.** The Planning Commission hereby recommends that the Town Council certify and adopt the proposed Initial Study and Negative Declaration document as it relates to the proposed Town of Paradise Housing Element 2022 Update; and

**SECTION 2.** The Planning Commission further recommends that the Town Council adopt the amendment to the Housing Element (2022-2030 Housing Element) of the 1994 Paradise General Plan known as Town of Paradise Housing Element 2022 Update in order to make the Paradise Housing Element consistent with the RHNP and current State housing element law, which amendment is set forth in Exhibit "A" attached hereto.

**PASSED AND ADOPTED** by the Planning Commission of the Town of Paradise this 24<sup>th</sup> day of May, 2022, by the following vote:

**AYES:**

**NOES:**

**ABSENT:**

**ABSTAIN:**

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Carissa Garrard, Chair

**ATTEST:**

**By:** \_\_\_\_\_  
Dina Volenski, Town Clerk

# **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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Appendix A: Technical Transportation Memorandum

Appendix B: Town VMT Policies

## 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**

<b>Income Group</b>	<b>Town of Paradise Units</b>	<b>Town of Paradise Percent</b>	<b>Butte County Units</b>	<b>Town of Paradise Percent of County RHNA</b>
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%
<b>Total</b>	<b>7,179</b>	<b>100%</b>	<b>15,506</b>	<b>46%</b>

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

**TABLE 2 TOWN OF PARADISE QUANTIFIED OBJECTIVES 2022-2030**

<b>Income Levels</b>	<b>Construction</b>	<b>Rehabilitation</b>	<b>Preservation</b>
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	-
<b>Total</b>	<b>3,020</b>	<b>55</b>	<b>-</b>

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.

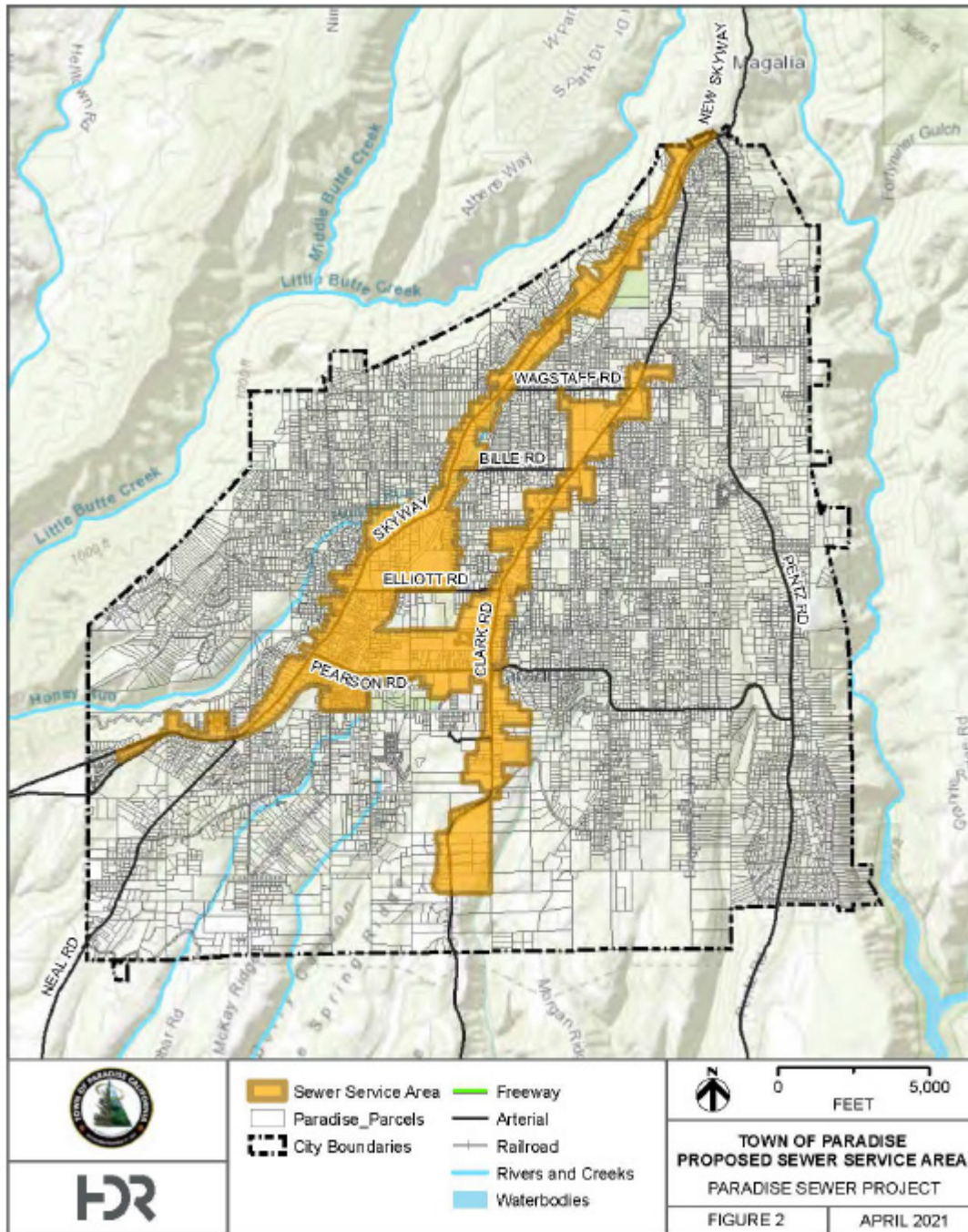
#### **12. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?**

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



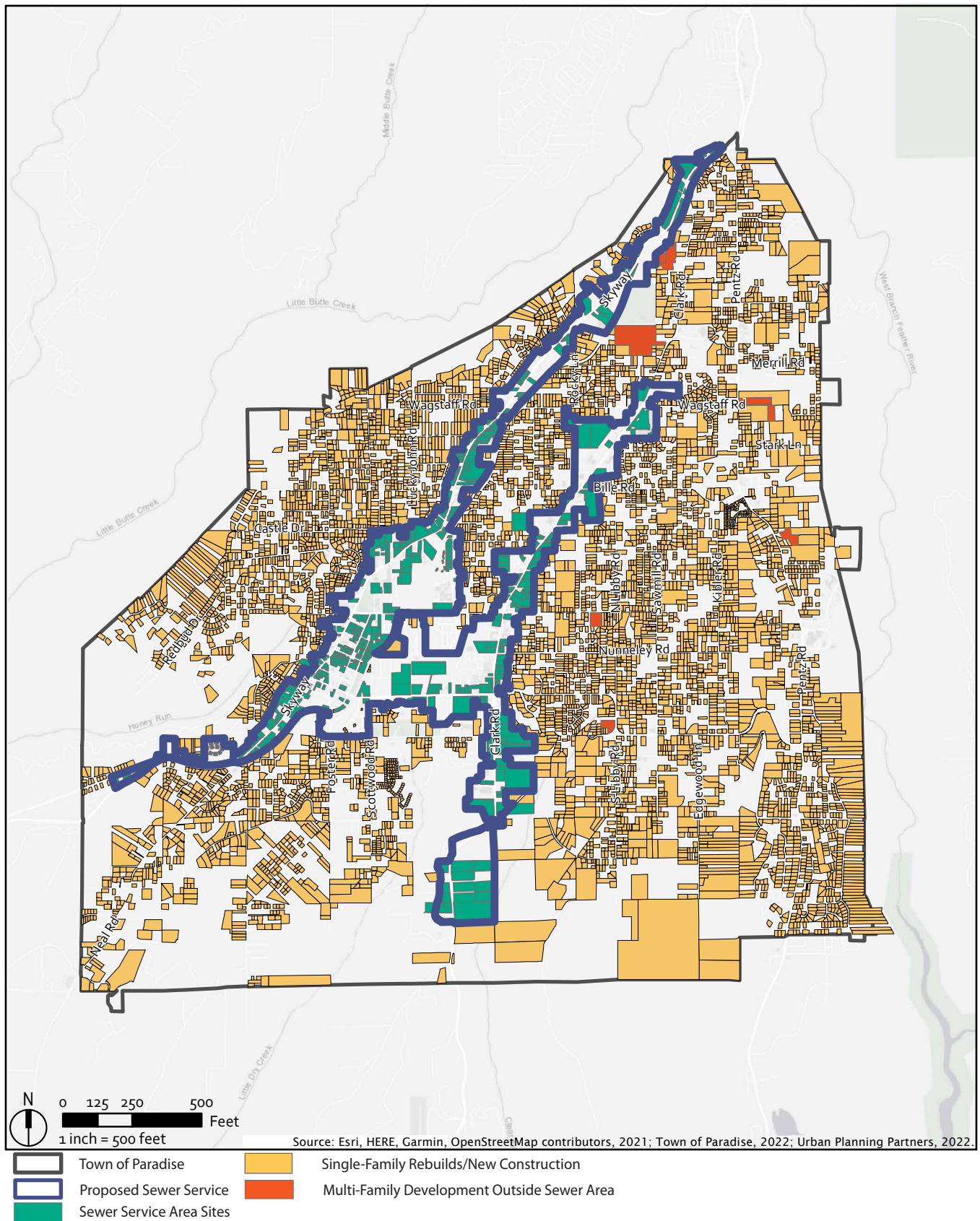


Figure 2  
Adequate Residential Sites

## 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
<b>Would the project:</b>				
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.

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## 2. Agricultural and Forestry Resources

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>Would the project:</b>				
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) <i>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?</i>				

**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.

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### 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 (PM<sub>2.5</sub>) and Ozone (O<sub>3</sub>). PM<sub>2.5</sub> 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 6<sup>th</sup> 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 fairy 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.

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## 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.<sup>1</sup>

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

<sup>1</sup> 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.

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## 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).<sup>2</sup> 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.

<sup>2</sup> 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.<sup>3</sup>

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.

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<sup>3</sup> 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

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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.<sup>4</sup> According to the California Energy Commission, carbon dioxide (CO<sub>2</sub>) emissions will be reduced by 700,000 metric tons during the three-year cycle of these energy standards.<sup>5</sup>

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.

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<sup>4</sup> 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.

<sup>5</sup> 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](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?*

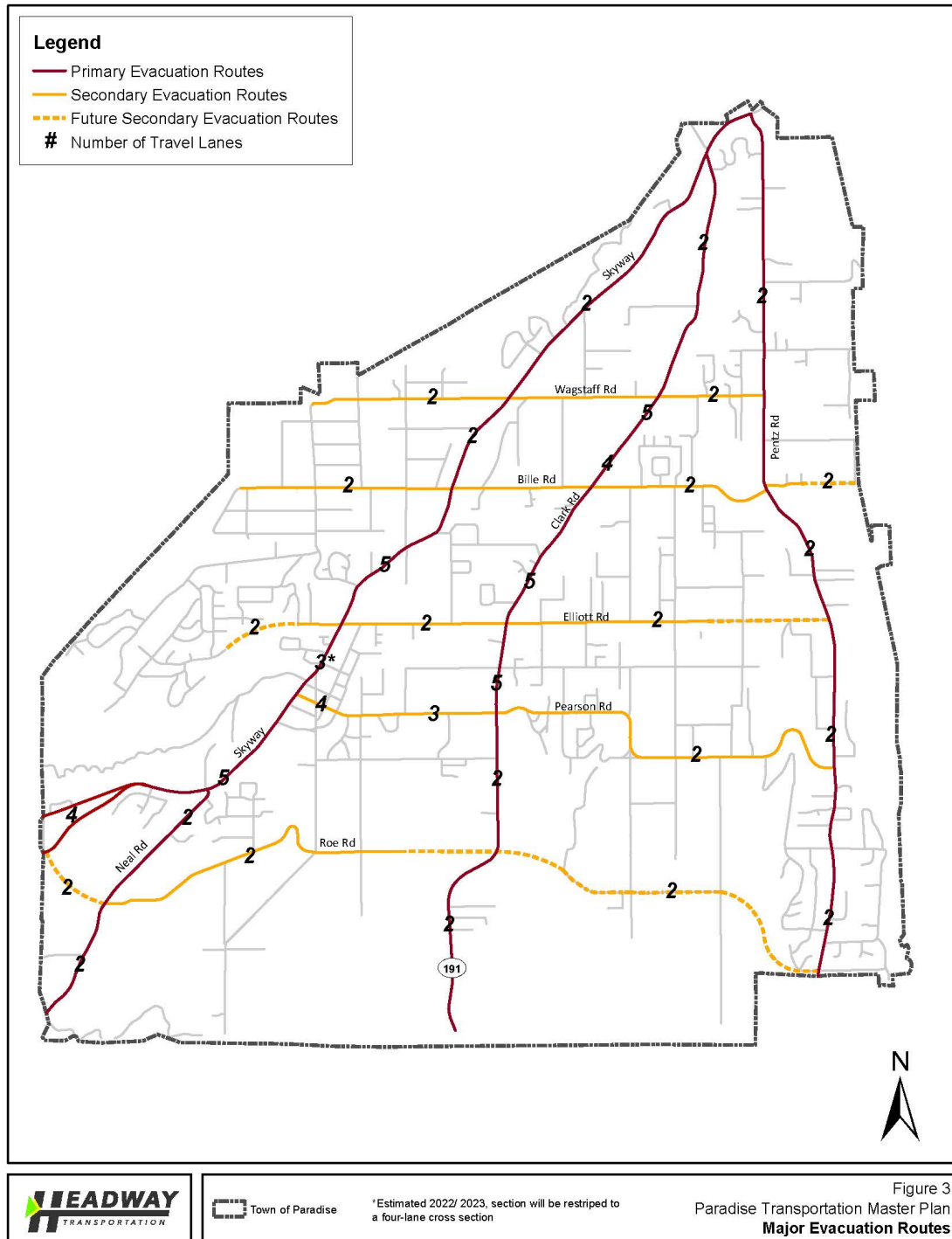
**Less Than Significant.** The Town of Paradise Emergency Operations Plan (EOP) (November 2011) addresses the Town's planned response to extraordinary emergency situations associated with natural disasters, technological incidents, and national security emergencies in or affecting the Town of Paradise. 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

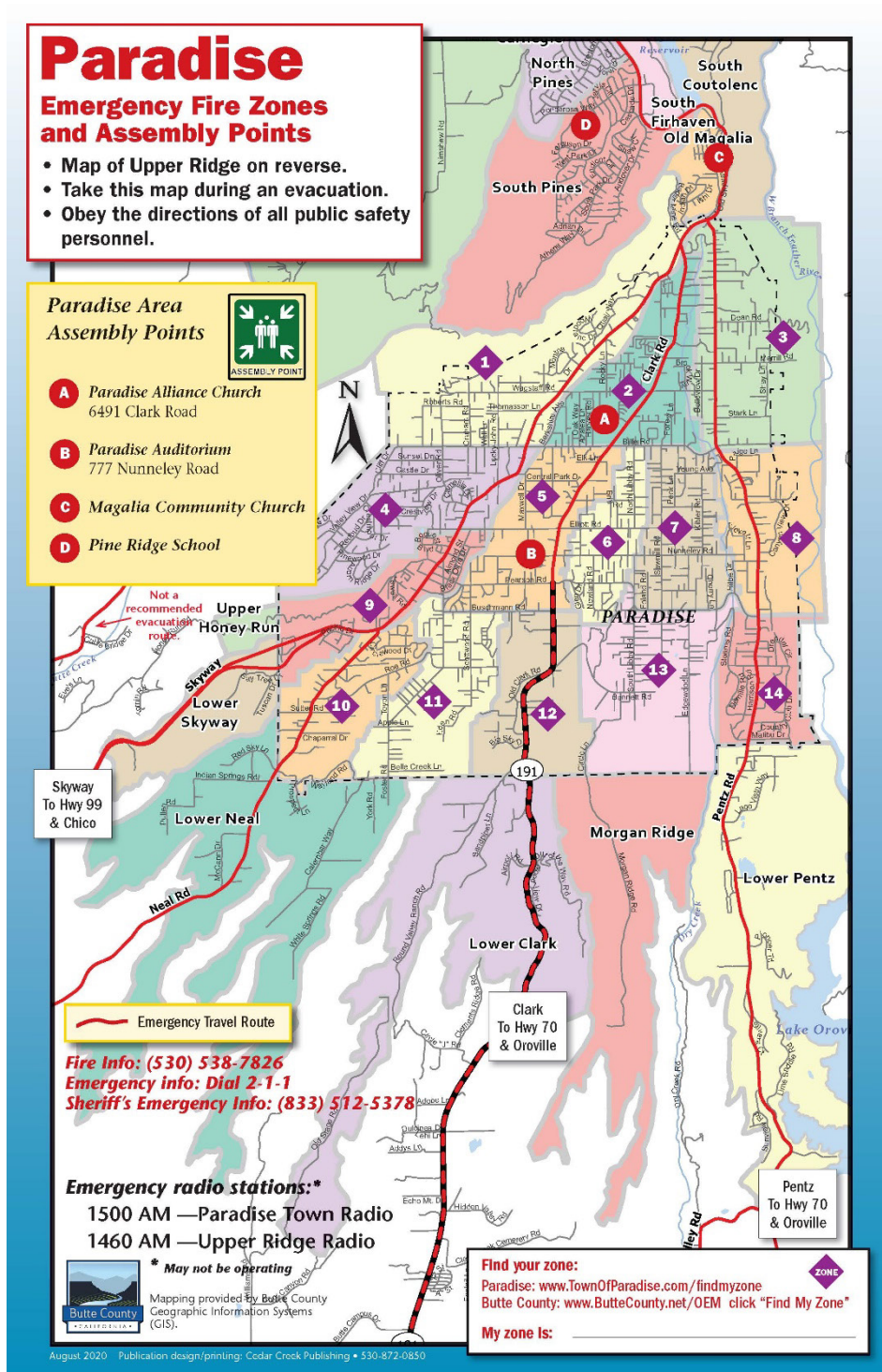
evacuation beyond the Town limits; and contraflow travel and controls during emergency events. Figure 3 shows the planned roadway improvements to repair damage from the Camp Fire and improve evacuation operations.

**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.

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## 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.

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## 11. Land Use and Planning

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>Would the project:</b>				
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.

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## 12. Mineral Resources

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>Would the project:</b>				
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.<sup>6</sup> The Project would have no impact on mineral resources.

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<sup>6</sup> 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
<b>Would the project result in:</b>				
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.

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## 14. Population and Housing

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>Would the project:</b>				
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) *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)?*

**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.

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## 15. Public Services

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>Would the project:</b>				
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) <i>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?</i>				

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.<sup>7</sup> 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.<sup>8</sup>

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

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

<sup>8</sup> 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.<sup>9</sup>

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.<sup>10</sup> 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.<sup>11</sup>

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

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

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

<sup>11</sup> 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.<sup>12</sup>

## 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

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<sup>12</sup> 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.<sup>13</sup> Therefore, impacts to other public facilities would be less than significant.

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<sup>13</sup> 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
<b>Would the project:</b>				
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.<sup>14</sup>

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<sup>14</sup> 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
<b>Would the project:</b>				
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**

<b>Planning Area</b>	<b>Model Year 2020</b>	<b>Model Year 2045</b>
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**

<b>Jurisdiction</b>	<b>2018</b>	<b>2020</b>	<b>2025</b>	<b>2030</b>	<b>2035</b>	<b>2040</b>	<b>Total Increase 2018- 2040</b>	<b>Percent Increase 2018- 2040</b>
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**

<b>Scenario</b>	<b>2030</b>
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.

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## 18. Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>Would the project:</b>				
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.<sup>15</sup> 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.

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<sup>15</sup> 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
<b>Would the project:</b>				
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"/>
a-c) <i>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,<sup>16</sup> 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.

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<sup>16</sup> 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.<sup>17</sup> 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.<sup>18</sup> 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.

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

<sup>18</sup> 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
<b>Would the project:</b>				
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.

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## 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.

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## IV. LIST OF PREPARERS

### **Town of Paradise**

Susan Hartman, Community Development Director

### **Prime Consultant**

*Urban Planning Partners, Inc.*

Lynette Dias, Principal

Curtis Banks, Principal Planner

Leslie Carmichael, Principal Planner

Meredith Rupp, Senior Planner

Alyssa Chung, Planner

Tabitha Tolsma, Assistant Planner

### **Additional Project Consultants**

*Transportation*

*W-Trans*

*Kittleson & Associates*



## V. REFERENCES

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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.

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## Roadway Network

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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.

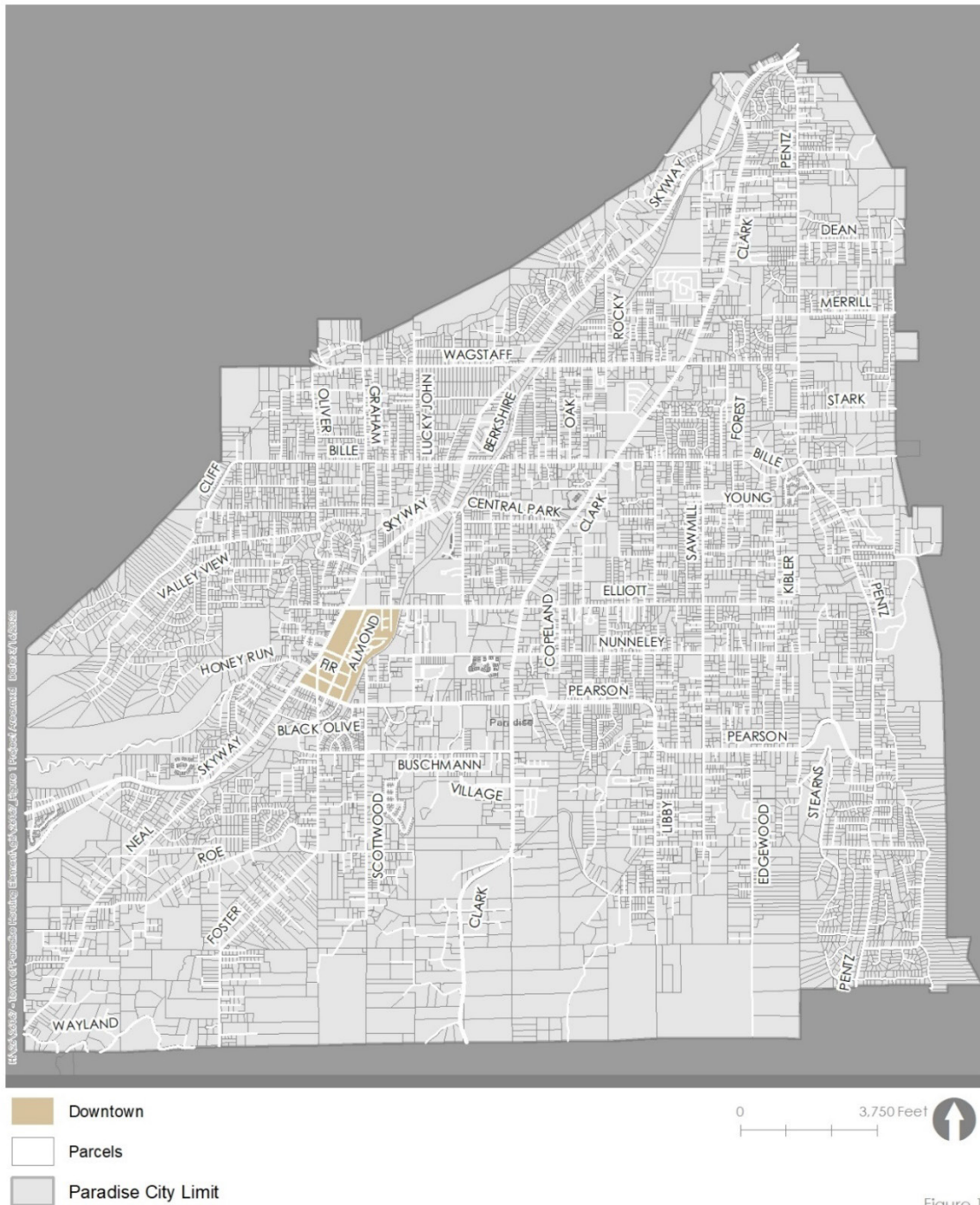
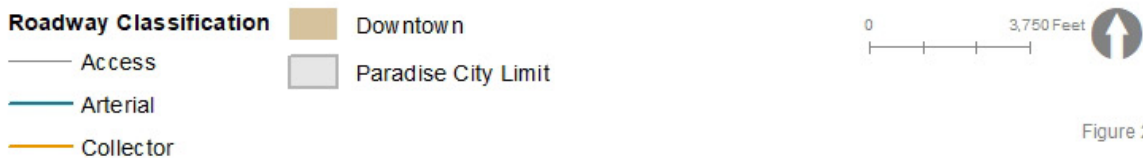


Figure 1



## Paradise Housing Element 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 classes<sup>1</sup>:

- **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.

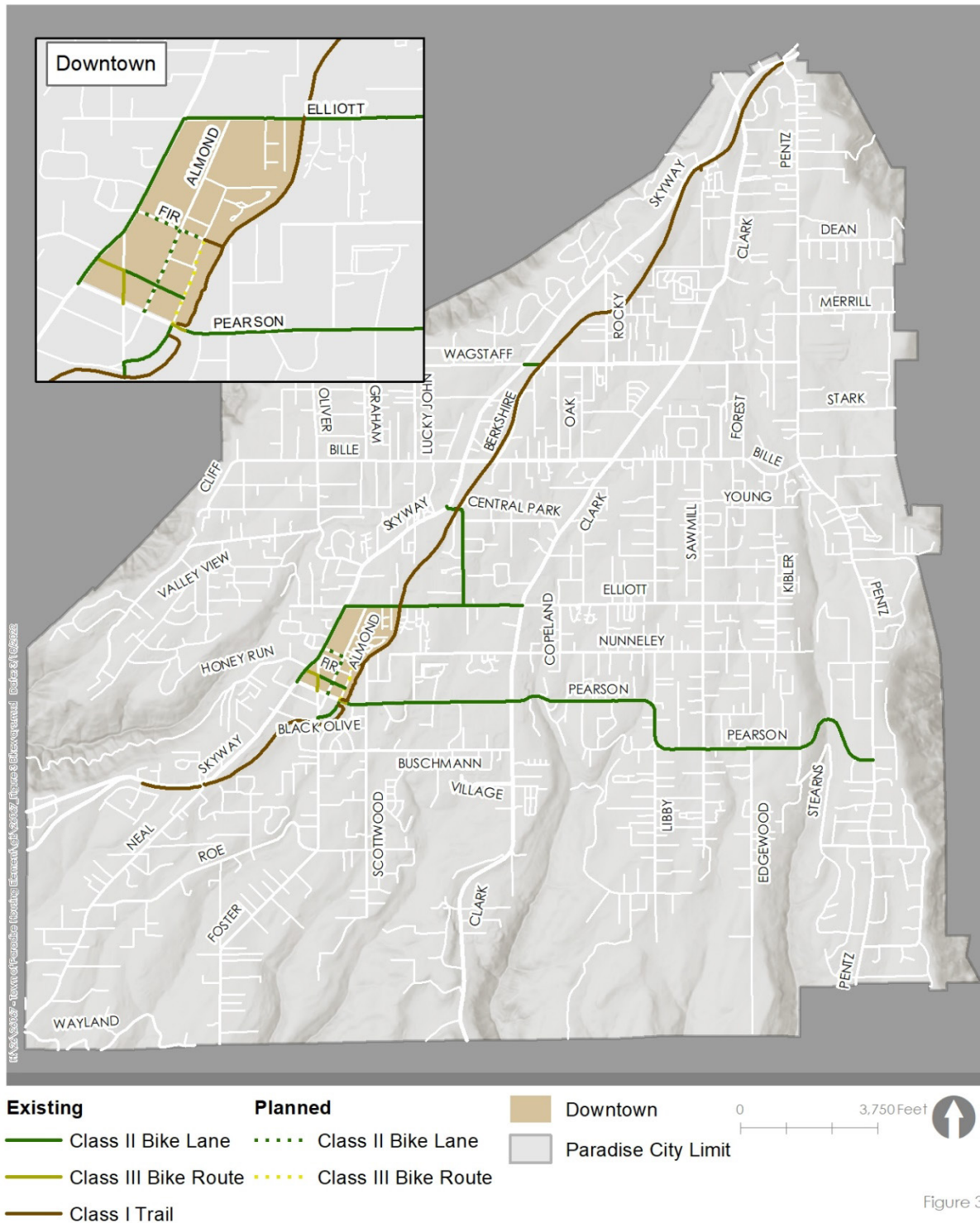
## PEDESTRIAN FACILITIES

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.

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





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## Vehicle Miles Traveled

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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.

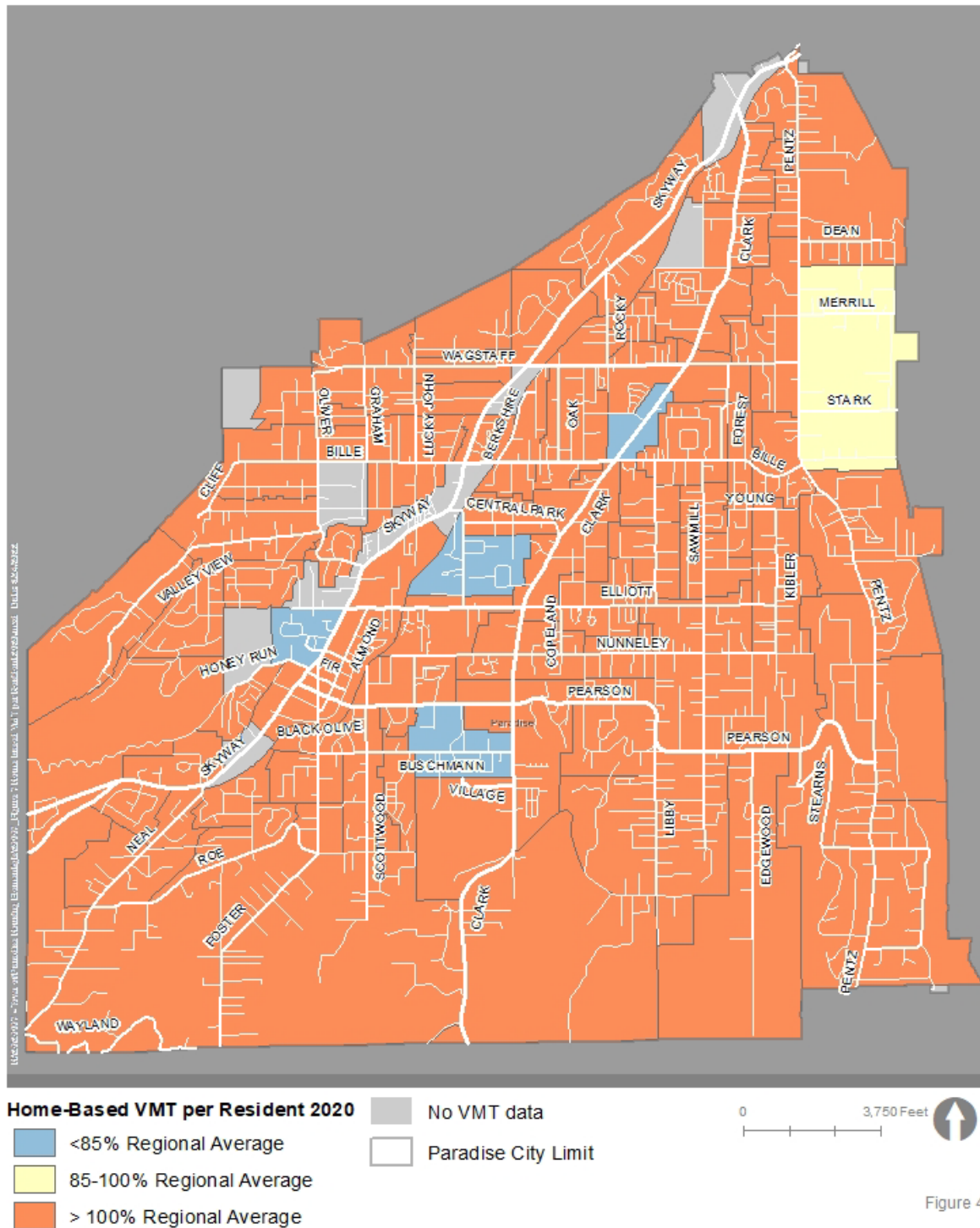
The BCAG travel demand model was referenced to assess the baseline and future year average household VMT per resident for the transportation analysis zones (TAZs) that comprise the Paradise planning area and Butte County. The BCAG Post-Camp Fire Model Update (Version 1.2) was used. Relevant to the Housing 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

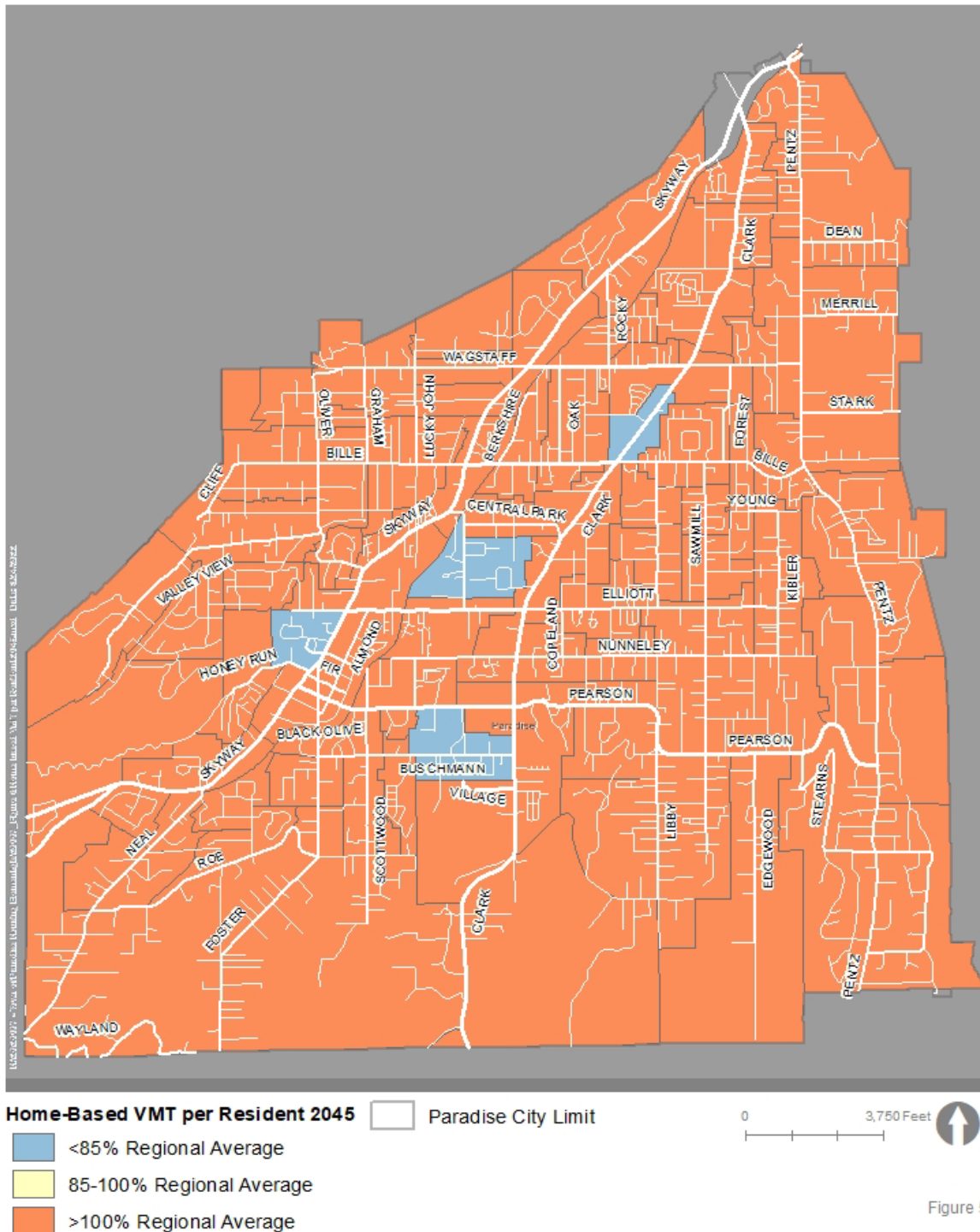
As Table 2 demonstrates, the average VMT per resident in Paradise is 36 to 42 percent higher than the county average in baseline and future year conditions, respectively. Figure 4 and Figure 5 show the low-VMT TAZs (at least 15 percent below Butte County average) within Paradise in the Model Year 2020 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.



**KITTELSON**  
 & ASSOCIATES

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





**KITTELSON**  
 & ASSOCIATES

**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.

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### Federal

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

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### State

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#### 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.<sup>2</sup>

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.

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

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## Regional

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### 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).

### 6<sup>th</sup> 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)<sup>3</sup>. BCAG also prepared and certified the 2020 Regional Transportation Plan/Sustainable Communities Strategy Supplemental Environmental Impact Report (RTP/SCS SEIR)<sup>4</sup> 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.

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<sup>3</sup> 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.

<sup>4</sup> 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](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

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 plan. 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 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.
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 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.

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## Local

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### **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.

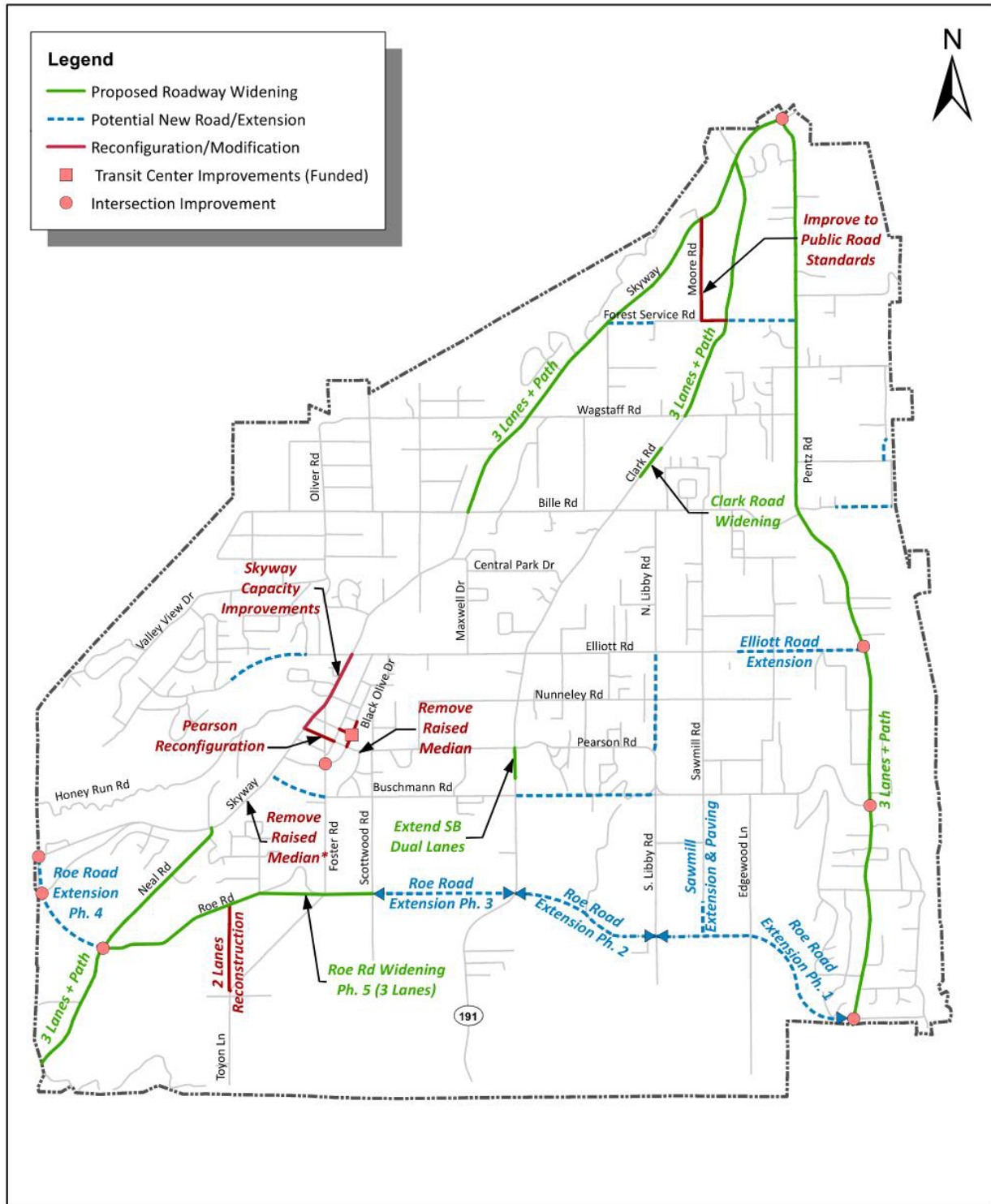
As part of the evacuation planning, the Town is determining major and secondary evacuation routes, potential areas of congestion, and opportunities for roadway extensions and connections on dead-end streets for additional routes and increased evacuation capacity. Figure 6 shows identified draft proposed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

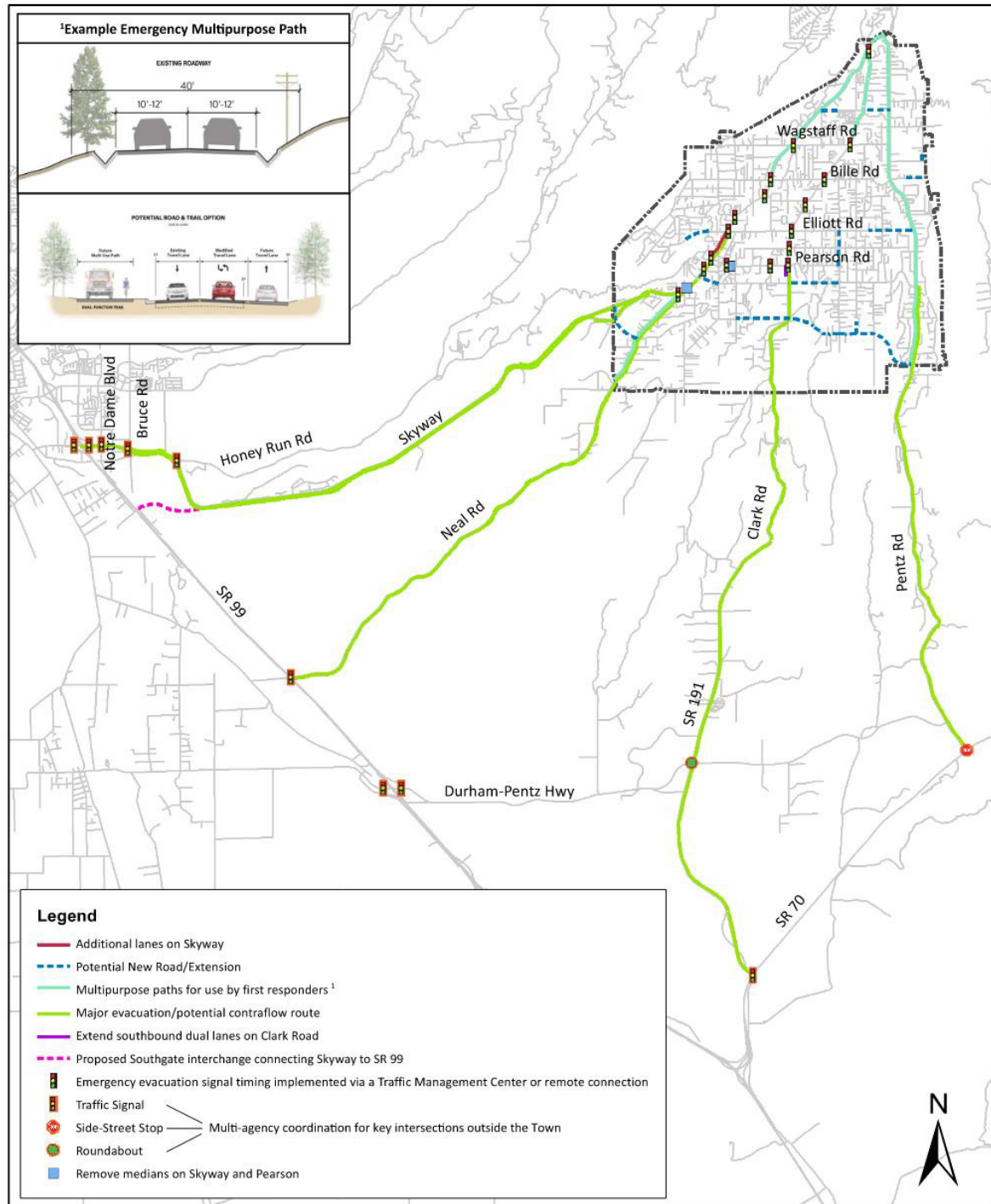
Figure 7 and Figure 8 show proposed evacuation routes and modifications to serve those routes.

**Figure 6: DRAFT Roadway Modifications as Part of Paradise TMP**



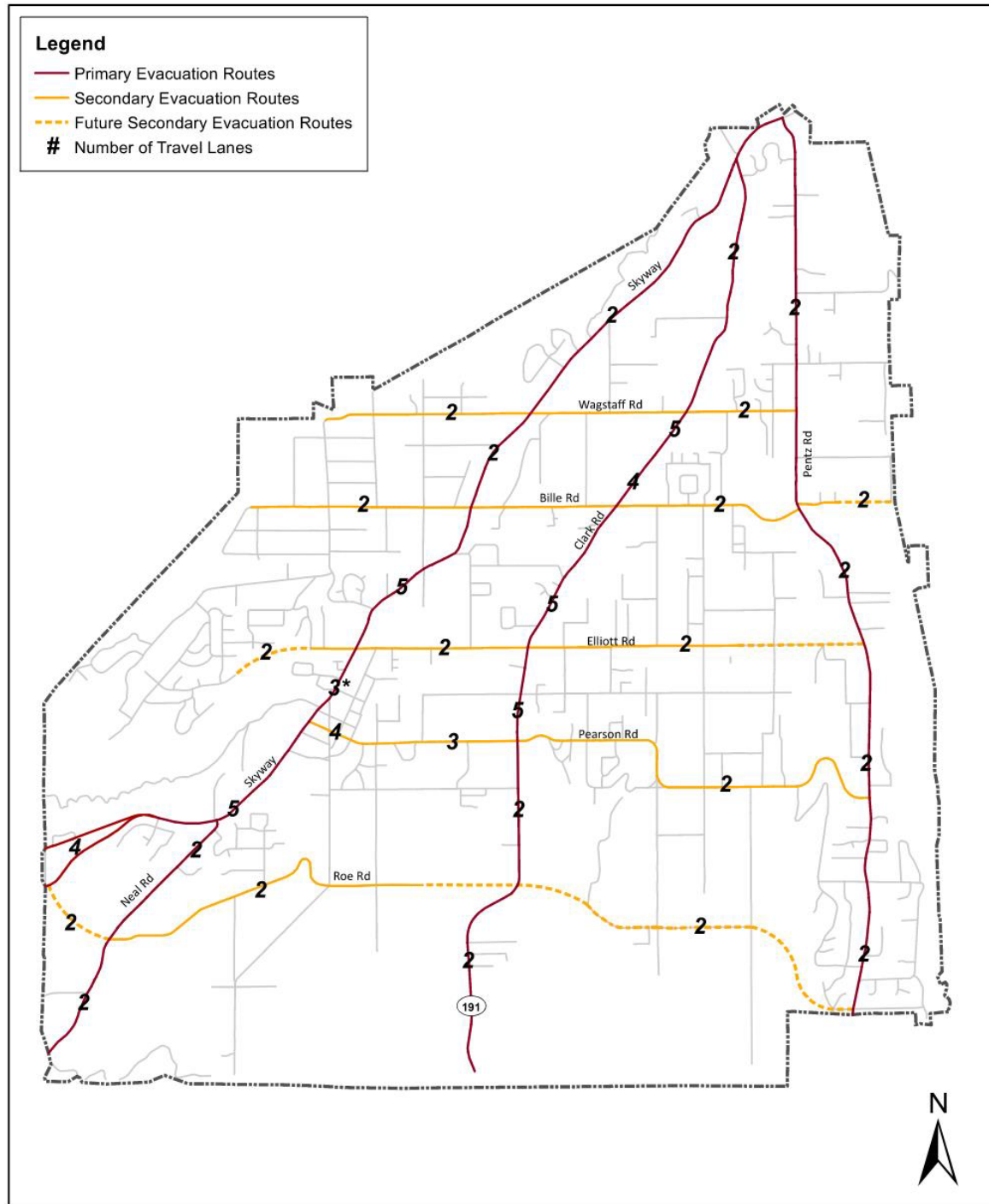
Source: Headway Transportation, Town of Paradise

**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.

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### CEQA Significance Criteria

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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:<sup>5</sup>

- 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.

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### VMT Analysis

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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

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<sup>5</sup> 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

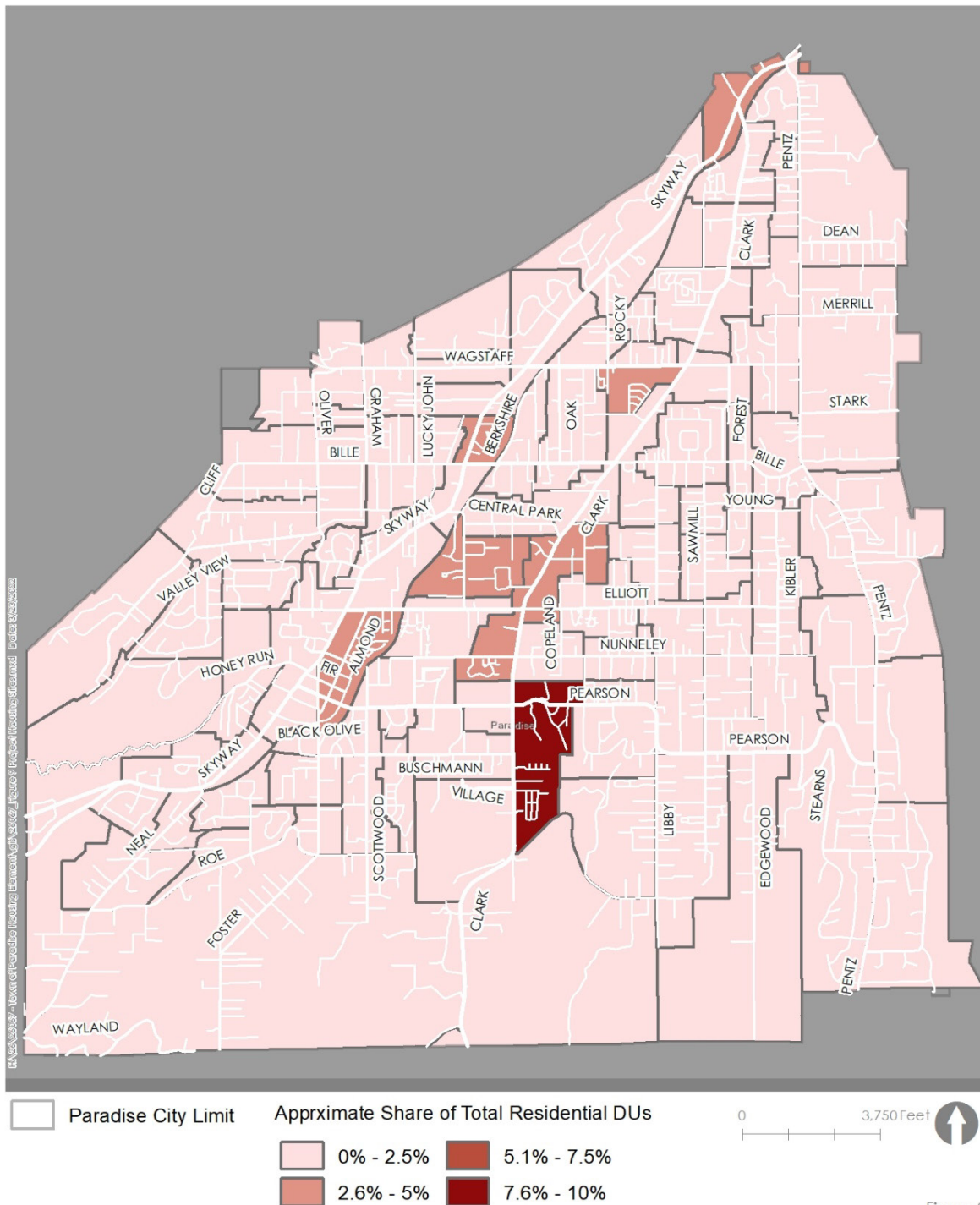
Source: BCAG

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.





**KITTELSON**  
 & ASSOCIATES

**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.

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**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)?**

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**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.

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#### THRESHOLD: WOULD THE PROJECT RESULT IN INADEQUATE EMERGENCY ACCESS?

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**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 <sup>1</sup>	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
<b>Total VMT per Capita</b>	<b>20.7</b>	<b>19.5</b>	<b>20.0</b>

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

<sup>1</sup> 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 12<sup>th</sup> 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.



# Town of Paradise

## 2022-2030 Housing Element Update



Prepared for:  
Town of Paradise

HCD Revisions Draft  
May 2022

URBAN  
PLANNING  
PARTNERS  
INC.





# Town of Paradise

## 2022-2030 Housing Element Update

Prepared for:

Town of Paradise

HCD Revisions Draft

May 2022

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## CHAPTER 1 | INTRODUCTION

The Town of Paradise has traditionally been known as a small rural town on the outskirts of Chico. As the population of the state continues to grow and pressure on resources increases, Paradise is concerned with providing adequate housing opportunities while maintaining a high standard of living for all citizens in the community. Recognizing the importance of providing adequate housing, the State has mandated a housing element in every general plan since 1969. This Housing Element (2022–2030) was created in compliance with State general plan law pertaining to housing elements and was adopted on [Placeholder], 2022.

Meeting the housing needs of Paradise’s residents and the Town’s share of regional housing needs is an important goal for the Town, and the 6th Cycle Housing Element update comes at a critical time for the Town. In 2018, Paradise and some surrounding areas in Butte County faced one of the most destructive wildfires in California history. The number of people drawn to the region over the past 30 years has steadily increased, but the fire caused an enormous housing shortage. 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. The rebuild process is an integral part of this Housing Element to ensure that housing of various types and sizes is created for residents across all income levels, ages, and abilities to have a place to call home.

Per State law, the Housing Element has two main purposes:

1. To provide an assessment of both current and future housing needs and constraints in meeting these needs; and
2. To provide a strategy that establishes housing goals, policies, and programs.

The 2022-2030 Housing Element Update provides a roadmap for how to meet the Town’s growth and housing challenges, identifies what the existing housing conditions and community needs are, reiterates goals, and creates a plan for more housing. Since the last Housing Element update in 2014, dozens of statewide housing bills have passed, with goals ranging from addressing segregation, to design standards, and resiliency. This Housing Element will include goals, policies, and programs that guide the community to meet these new requirements and rebuild safely, fairly, and consistently with the Town’s character.

## 1. INTRODUCTION

Broad-based community participation is essential to preparing an implementable and locally meaningful housing policy and action program, especially in the context of rebuilding what was lost in the fire. The programs included in this document evolved through collaborative workshops with local residents and representatives of agencies that provide housing and other social service assistance to town, county, and regional residents, as well as analysis of local population characteristics, households, housing stock, and economic conditions.

## CONTENTS

Consistent with State law, this Housing Element consists of the following major components:

- **Housing Needs Assessment [Chapter 2].** The Housing Needs Assessment chapter includes an analysis of population and employment trends, the Town's fair share of regional housing needs, household characteristics, and the condition of the housing stock.
- **Constraints [Chapter 3].** The Constraints chapter reviews governmental constraints, including land use controls, fees, and processing requirements, as well as non-governmental constraints, such as construction costs, availability of land and financing, physical environmental conditions, and units at risk of conversion, that may impede the development, preservation, and maintenance of housing.
- **Resources [Chapter 4].** The Resources chapter identifies resources available for the production and maintenance of housing, including an inventory of land suitable for residential development and discussion of federal, State, and local financial resources and programs available to address the Town's housing goals.
- **Effectiveness of the Previous Housing Element [Chapter 5].** The Effectiveness of the Previous Housing Element chapter evaluates implementation of the 2014–2022 Housing Element in order to determine the effectiveness of the previous Housing Element, the Town's progress in implementing the

previous Housing Element, and the appropriateness of the housing goals, objectives, and policies.

- **Housing Goals, Policies, and Programs [Chapter 6].** This chapter identifies the Town's housing goals and provides policies and programs to address the Town's housing needs.
- **Community Participation [Chapter 7].** The Community Participation chapter describes how the Town engaged the public, including town residents, businesspeople, and interested parties, including housing and special needs advocates.

## RELATIONSHIP TO OTHER ELEMENTS

State law requires that "the general plan and elements and parts thereof comprise an integrated, internally consistent, and compatible statement of policies." The purpose of requiring internal consistency is to avoid policy conflict and provide a clear policy guide for the future maintenance, improvement, and development of housing in the town. All elements of the General Plan have been reviewed for consistency in coordination with this update to the Housing Element. In addition, the Town reviews the General Plan elements for consistency annually in order to prepare the General Plan annual report. Town staff conducts the consistency review which is reviewed by the Planning Commission and the Town Council prior to submitting the annual report to HCD and the Office of Planning and Research (OPR).

### PARADISE GENERAL PLAN UPDATE

The Town of Paradise's current General Plan was adopted in 1994 and last amended in 2008. The Town is preparing to undertake a General Plan update, and this Housing Element is the first Element that will be updated in conjunction with the update. It will be followed by the Safety Element. Elements are like chapters of the General Plan.

## GENERAL PLAN POLICIES

In accordance with the Government Code and various environmental laws, the General Plan sets forth policies related to safety, open space, conservation, and energy. These policies seek to protect and preserve important values of the community but tend to conflict with the ability to develop certain land for housing. Such conflicts can be considered a constraint. Some of the General Plan policies that could serve as a constraint to housing development are presented below.

**Safety Element:** Policy provisions in the General Plan minimize risks to life and property from various natural hazards. Policies SP-10 and SP-11, for example, prohibit structures within a potential floodway, and Policy SP-17 prohibits building on slopes in excess of 30 percent. These policies constrain development, but this constraint is necessary to protect the town's citizens.

**Open Space:** The General Plan includes a policy that seeks to minimize impacts to scenic areas. Policy OCEP-5 encourages locating new structures outside of scenic view corridors. This policy constrains development in scenic areas but is consistent with environmental standards throughout California.

**Conservation:** Several policies provide for the protection and conservation of resources that are important to the community. For instance, Policy OCEP-13 protects large trees of historic and/or cultural significance, and Policies OCEP-15 through OCEP-17 seek to preserve natural habitat areas, fisheries, and deer migration areas. Policy OCEP-21 protects the viewsheds along the Skyway, and Policies OCEP-24 and OCEP-26 both protect significantly important streams and riparian areas. Policy OCEP-32 protects significantly important agricultural and timber areas. These policies constrain development in numerous areas, but they are consistent with environmental standards throughout California.

**Energy:** The General Plan includes a policy that seeks to conserve energy. Policy OCEP-39 states that multi-family residential uses should be located near shopping areas, medical offices, and collector streets to promote pedestrian travel and the use of the bus system. This policy constrains development of multi-family units, but it is consistent with good planning practice and environmental standards throughout California.

## 1. INTRODUCTION

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## CHAPTER 2 | HOUSING NEEDS ASSESSMENT

To successfully plan for housing needs, the demographic and socioeconomic variables of the community must be assessed. This chapter discusses the components of housing needs, which include population characteristics, household characteristics, employment, and housing stock conditions.

Paradise is much different today than it was in 2014 (when the Housing Element was last updated). The 2018 Camp Fire is the primary driver of demographic change and the residents' current housing needs. According to the *Camp Fire Regional Economic Impact Analysis*, The Camp Fire destroyed an estimated 95 percent of the town's structures and between 2018 and 2020, the town's population dropped by approximately 21,600 residents, an 82 percent decline.

The timing of the fire and the subsequent decline in population make collection of demographic and socioeconomic data challenging. The three-year and five-year American Community Survey (ACS) data do not reflect impacts of the fire. Therefore, data from the US Census and ACS are supplemented by the Town of Paradise Local Census Survey 2021 conducted by the Rural Community Assistance Corporation (RCAC) in Spring and Summer 2021. Additional sources referenced include the California Department of Finance (DOF), Butte County Association of Governments (BCAG), the US Department of Housing and Urban Development (HUD), various Town documents, and other sources.

Unless otherwise specified, the data in this chapter is specific to the Town of Paradise. This document summarizes the Housing Needs Assessment. A full assessment can be found in the Appendix A.

### CAMP FIRE CONTEXT

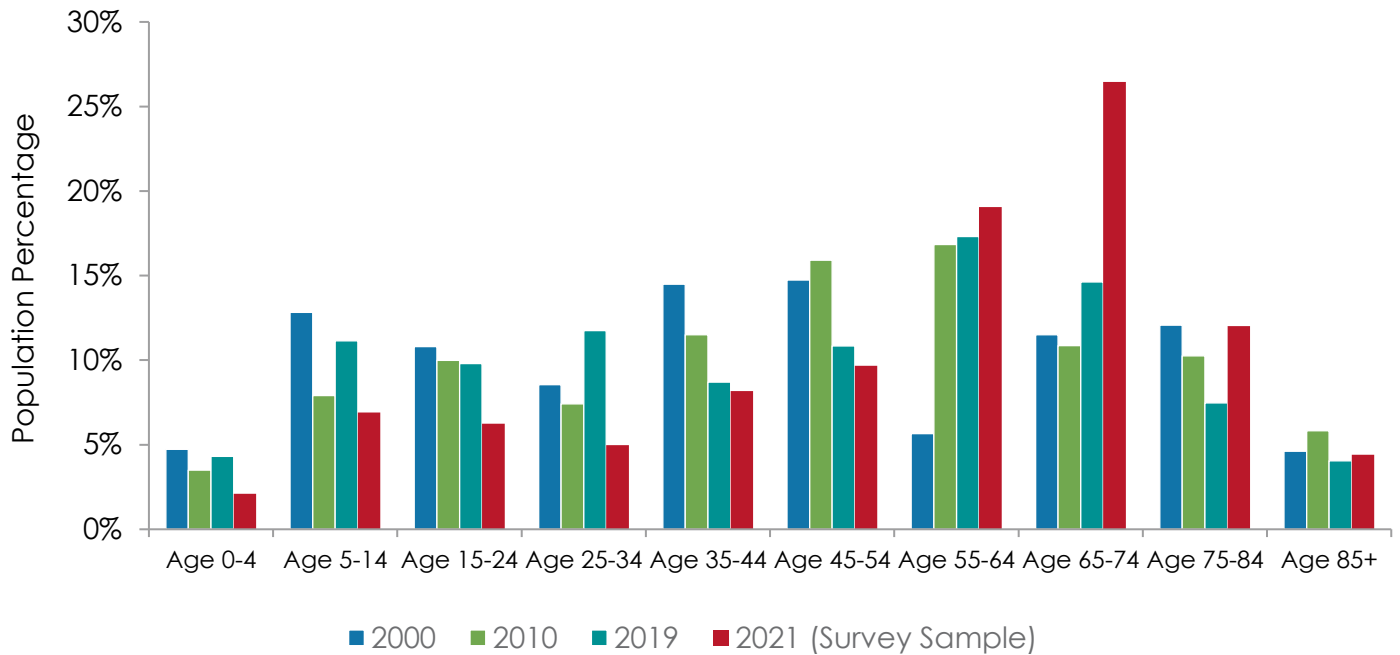
In 2018, Paradise and some surrounding areas in Butte County faced one of the most destructive wildfires in California history, resulting in the loss of 85 lives, nearly 19,000 structures, the burning of more than 150,000 acres over two weeks, and \$9 billion in insurance claims. The number of people drawn to the region over the past 30 years had steadily increased year by year, but the fire caused an enormous housing shortage. The rebuild process is an integral part of this Housing Element to ensure that housing of various types and sizes is created for residents across all income levels, ages, and abilities to have a place to call home.

### SUMMARY OF KEY FACTS

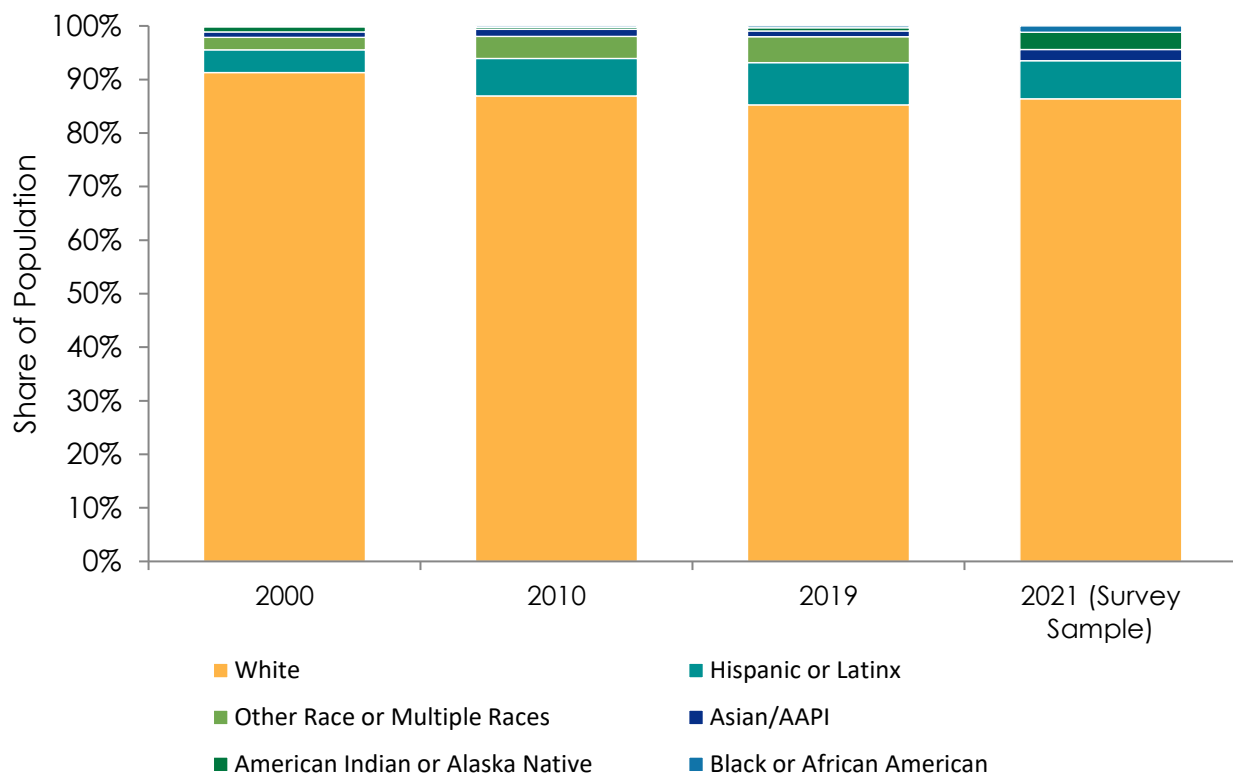
Appendix A provides a detailed analysis of housing needs. Key points from the report are below.

- **Population** – Generally, the population of Paradise has 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 the County. However, the 2018 Camp Fire led to a population decrease of approximately 21,600 residents, leaving the Town with only 4,631 residents.
- **Age** – Respondents of the Town of Paradise Local Census Survey imply that the percentage of the population aged over 65 has increased significantly since the Camp Fire, while the proportion of all other age groups have decreased.
- **Race/Ethnicity** – Since 2000, the percentage of residents in Paradise identifying as White has decreased but remains the vast majority. The percentage of residents of all other races and ethnicities has *increased*, estimated to be 14 percent compared to 9 percent in 2000. In absolute terms, the Hispanic or Latinx population increased the most, from 4 percent of the population in 2000 to an estimated 7 percent in 2021.
- **Employment** – Historically, the highest percentage of jobs in Paradise and Butte County have been in Health & Educational Services at 31 percent and 26 percent, respectively. Between 2002 and 2015, the number of jobs in Paradise increased by 17 percent, and then dropped again by 7 percent between 2015 and 2018. After the 2018 Camp Fire, we expect that many jobs, especially related to the hospital, were lost or moved elsewhere in the County.
- **Number of Homes** – Paradise’s housing stock in 2015 was made up of 69 percent single-family detached homes, 16 percent manufactured homes, and 9 percent multi-family homes with 2 to 4 units. Until the Camp Fire, growth in each category had remained consistent. The Camp Fire led to significant decreases in all housing stock, from 13,091 in 2018 to 1,720 in 2019. Multi-family homes with 2 to 4 units saw the least change and increased as a percentage of housing. In the beginning of 2020, the housing stock consisted of a 68 percent single-family detached homes (-1 percent), 22 percent multi-family homes with 2 to 4 units (up 13 percent from pre-Fire), 8 percent multi-family homes with five or more units (up 5 percent from pre-Fire), 2 percent single-family attached homes, and 1 percent manufactured homes on permanent foundations (which is the sharpest decline in percentage at -16 percent).
- **Home Prices** – Census Data reports that the largest proportion of homes in Paradise are valued between \$250,000 and \$500,000. Since the last housing element in 2014 the typical home value in Paradise according to Zillow has increased 33 percent from \$227,634 to \$303,128 as of December 2020.
- **Housing Type** – 87 percent of households in permanent “stick-built” homes are homeowners, while 90 percent of households in manufactured homes are homeowners, and a slightly lower 83 percent of those living in temporary housing structures are homeowners. This data is complicated by the fact that many households are waiting for their permanent homes to be rebuilt, so they’re living in temporary shelter but do own property in Paradise.
- **Displacement** – The meaning of displacement has a unique definition in Paradise due to the widespread displacement of residents caused by the 2018 Camp Fire, which displaced 13,314 households. Of those who moved census tracts, 38 percent (2,148 households) were senior-led households. According to a report written by Next 10 and UC Berkeley’s Center for Community Innovation, *Rebuilding for a Resilient Recovery: Planning in California’s Wildland Urban Interface*, low-income households represented 41 percent of households that relocated, compared to 50 percent of households that stayed, indicating that lower-income households were less likely to move.

## 2. HOUSING NEEDS ASSESSMENT



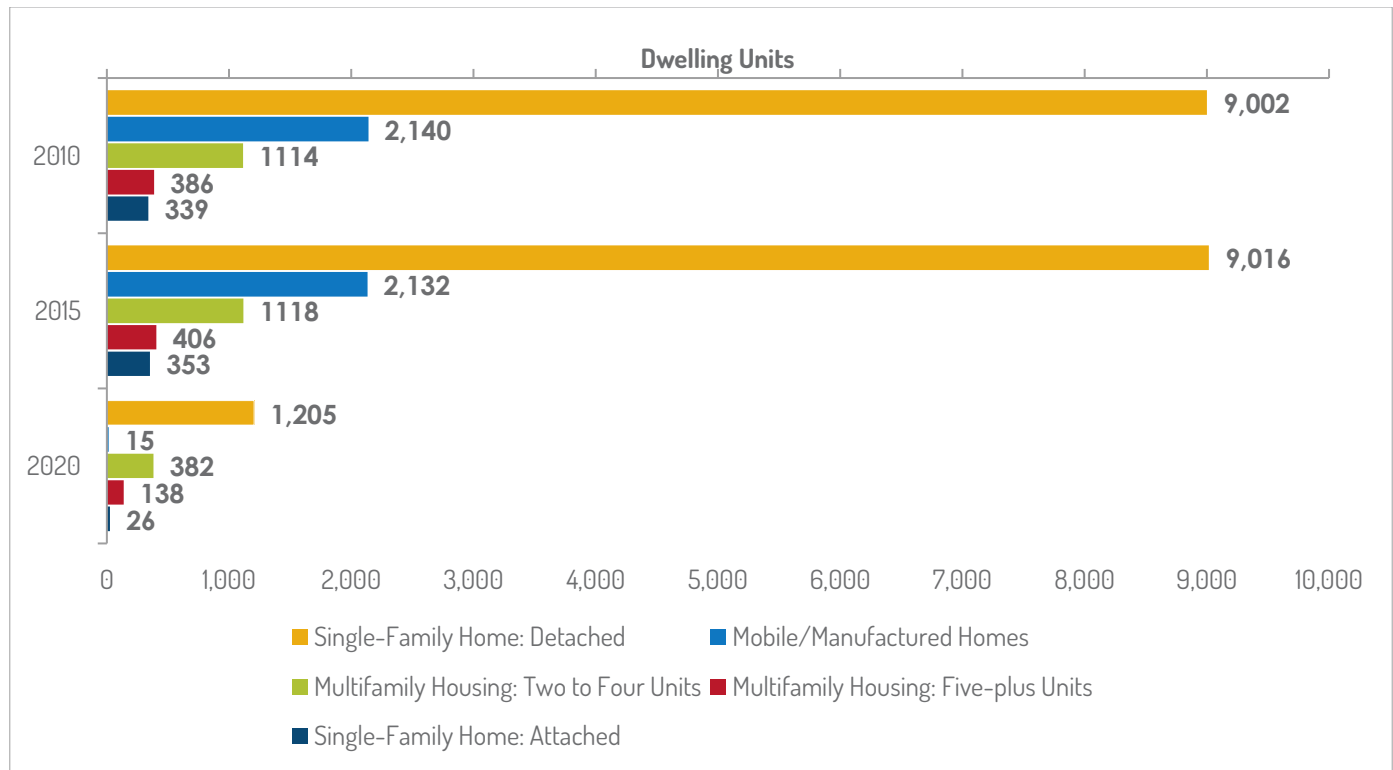
Source: U.S. Census Bureau, Census 2000 SF1, Table P12; U.S. Census Bureau, Census 2010 SF1, Table P12; U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B01001; Town of Paradise Local Census Survey 2021.



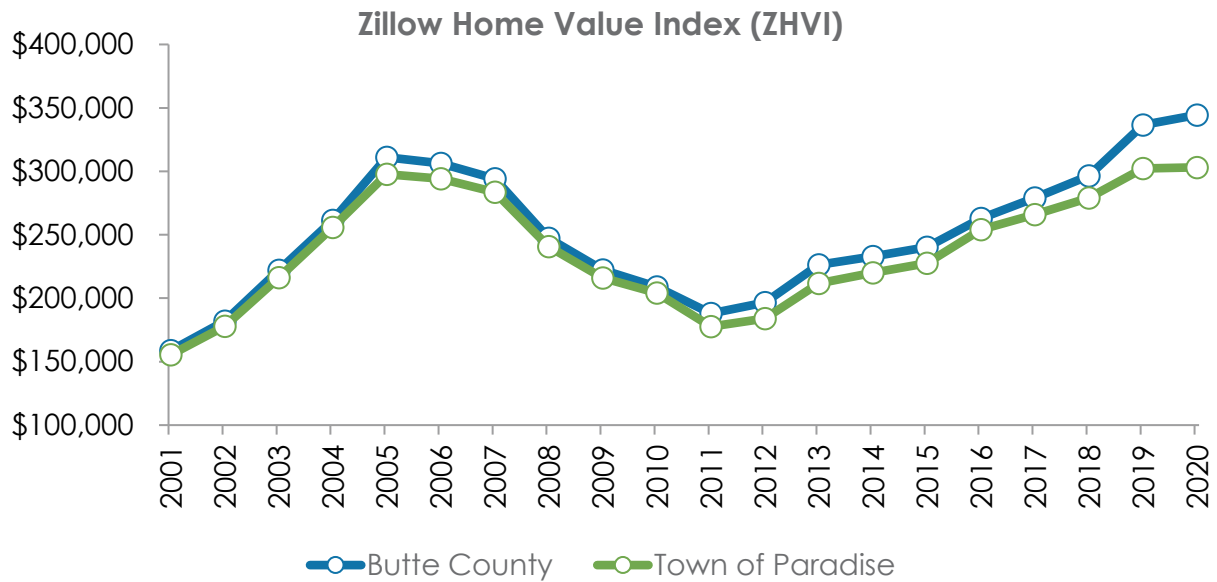
Source: U.S. Census Bureau, Census 2000, Table P004; U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B03002; Town of Paradise Local Census Survey 2021.



## 2. HOUSING NEEDS ASSESSMENT



Source: California Department of Finance, E-5 series.



Source: Zillow, Zillow Home Value Index (ZHVI).

- **Overpayment** – 52 percent of renters spend 30 percent to 50 percent of their income on housing compared to 25 percent of those that own. Additionally, 22 percent of renters spend 50 percent or more of their income on housing, compared to 10 percent of owners who are severely cost-burdened (meaning they spend more than 30 percent of monthly income on housing costs). Of the Extremely Low-Income households, 61 percent are cost-burdened and 36 percent spend over half of their income on housing. For Moderate or Above Moderate income, just 4 percent are severely cost-burdened, and 82 percent with Moderate or Above Moderate income spend less than 30 percent of their income on housing.
- **Special Housing Needs** – Some population groups may have special housing needs that require specific program responses, and these groups may experience barriers to accessing stable housing due to their specific housing circumstances. In Paradise, 18 percent of people have a disability of any kind. Additionally, 17 percent of households with five or more people are very low-income, earning less than 50 percent of the area median income (AMI). In Paradise, there are at least 93 persons with disabilities, 33 of which are under 18 and between 60 and 71 of which are adults over the age of 18.

## AFFIRMATIVELY FURTHERING FAIR HOUSING

In 2018, California legislators introduced Assembly Bill (AB) 686 to try to ameliorate issues brought about by historic patterns of segregation that have led to neighborhoods with concentrated poverty and poor housing stock, limited access to opportunity, unsafe environmental conditions, underfunded schools, dilapidated infrastructure, and other disproportionately experienced problems throughout the state. AB 686 defines Affirmatively Furthering Fair Housing as “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.”

Specifically, these meaningful actions must aim to accomplish the following:

- Address significant disparities in housing needs and in access to opportunity;
- Replace segregated living patterns with truly integrated and balanced living patterns;
- Transform racially and ethnically concentrated areas of poverty into areas of opportunity; and
- Foster and maintain compliance with civil rights and fair housing laws.

AB 686 also creates new housing element requirements due to be revised starting in January of 2021, including (1) outreach to community stakeholders in the housing element public participation process, (2) an assessment of fair housing practices, (3) an analysis of the relationship between available sites and areas of high or low resources, and (4) concrete actions and programs to affirmatively further fair housing. California Government Code Section 65583 (10)(A)(ii) requires an analysis of areas of segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs, including displacement risk.

In Paradise, Census data that is normally used to identify fair housing issues is outdated. Census data were collected prior to the 2018 Camp Fire and do not reflect the on-the-ground reality that renters and homeowners are facing since the fire and its destruction throughout the Town. Instead, to examine fair housing issues for the required assessment of fair housing practices, we used the Town of Paradise 2021 Local Census data and interviews with representatives of impacted groups, such as those who lost their homes and developmentally disabled adults, which also addresses the first component of the new Housing Element requirements: outreach. As discussed in Chapter 7: Community Participation, in addition to the standard public hearing process, interviews were conducted with eight stakeholder groups in an effort to reach all segments of the community.

A full Affirmatively Furthering Fair Housing Report is included in Appendix B and summarized here.

## 2. HOUSING NEEDS ASSESSMENT

- There are no public housing buildings in Paradise post-fire and not very many households who utilize Housing Choice Vouchers, but those who are appear evenly spread throughout the Town and surrounding areas, despite some clustering in areas where multi-family units are more prevalent.
- Complaints about housing discrimination in the Town have not been an issue, but the Town is being proactive about adding fair housing programming and resources to its website and working with local organizations who provide these services.

The Paradise Ridge was established as a permanent settlement during the gold rush era and has transformed over time from mining to subsistence farming, to logging and agriculture, to modest retail trade. Today, it is primarily a residential community. The discovery of gold led to a predominantly Anglo settlement, which remains the main demographic of the population that exists in the Town today.<sup>1</sup> However, according to observations from Town staff, the rebuilding process after the 2018 Camp Fire has led to the population becoming more diverse. It is important to ensure that enough housing will be available for those who are helping rebuild the Town.

- In the rebuilding completed to date, Town staff have reported that all new housing has been evenly dispersed in size and type. There are no single neighborhoods are areas of town where BIPOC populations are concentrated. As the town continues to rebuild, it is anticipated that multi-family buildings will continue to be located downtown near services and bus transit, especially with the proposed sewer that will allow denser projects in this area of town. This could lead to trends of continued diversity in this area.
- Paradise is primarily made up of a White, English-speaking population and therefore does

not experience segregation in terms of race or languages spoken within the town. However, there have been slight increases in the non-White population in recent years before the fire and according to local town staff active in rebuilding. There is the potential for some economic segregation as Town staff have identified pockets of wealth on the eastern and western edges of town and the sewer project is intended to accommodate the majority of future multi-family housing. However, the market rate rents in Paradise are sometimes equivalent to low-income (80 percent AMI) rents and manufactured housing continues to be a source of affordable housing in Paradise that is dispersed throughout the town. As the town continues to rebuild and change, fair housing programs will work to facilitate greater integration.

- According to the California Tax Credit Allocation Committee (TCAC) Opportunity Area Map, the majority of Paradise is considered moderate or low resource areas. High resource areas, which are concentrated in the northeast portion of the Town, are areas with high index scores for a variety of educational, environmental, and economic indicators. Some of the indicators identified by TCAC include high levels of employment and close proximity to jobs, access to effective educational opportunities for both children and adults, low concentration of poverty, and low levels of environmental pollutants, among others. However, this data was collected prior to the 2018 Camp Fire and does not reflect the reality of the Town today.
- The Town's overall access to opportunity was very affected by the 2018 Camp Fire and the subsequent closure of some of the Town's major employers. The remoteness of Paradise from major employment centers and lack of effective transit are major factors keeping more

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<sup>1</sup> McDonald, Lois. (2000). *"This Paradise We Call Home."* Gold Nugget Museum.

of Paradise from being a high resource area before and after the Camp Fire. There do not appear to be disparities in the types of housing being rebuilt in various areas, other than the lack of rental housing generally. Due to the rural nature of the Town, a lack of sidewalks and public transportation also cause unique challenges for persons with disabilities.

- While there are no technically defined Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) in Butte County, TCAC identifies some areas in Chico and around the City of Oroville as areas experiencing high segregation and poverty. There are no such areas in Paradise, but some amount of poverty concentration is expected in the remaining affordable developments in the Town. There is no single neighborhood or area of town where people of color are concentrated.
- Seniors, low-income households, and renters were disproportionately affected and displaced by the Camp Fire, and that many people are eager to come back to Paradise and miss their home. This sentiment was expressed especially through interviews with the California Vocations Inc. (CVI), a non-profit organization dedicated to providing residential and vocational support to developmentally disabled adults. CVI representatives shared that they often hear “I want to go back home.” However, there are few units to come back to after the fire’s destruction. CVI clients do not understand this. In addition to the lack of housing, the presence of services, especially medical services, is one issue impacting if or when past residents with a developmental disability may return.
- As discussed in the Paradise Safety Element, Paradise is at very high risk for future wildfire. Research has shown that renters, and especially

low-income renters, are often disproportionately exposed to environmental hazards and housing tenure is a decisive factor in a society’s vulnerability to disaster.<sup>2</sup> Housing tenure is such an important factor in disaster recovery because renters do not control the housing units in which they live. Renters are more likely to be displaced post-disaster because they do not determine if or when their housing unit will be rebuilt, there are fewer financial resources to rebuild rental housing than for homeowners, and renters are more likely to live in multi-family buildings that can take longer to rebuild post-disaster than a single-family home. Furthermore, renters do not control vegetation management and other fire risk reduction measures, or the ability to add resilience investments on the property where they live. Finally, rental prices increase as rental housing supply decrease.

- Nearly all rental housing was destroyed in the fire. According to data from Urban Footprint, approximately 75 percent of parcels developed with multi-family housing and approximately 88 percent of all multi-family dwelling units were destroyed in the fire. The destruction included some of the Town’s only deed-restricted affordable housing projects. One affordable project, Paradise Gardens III, is prioritized to be rebuilt and is expected to be completed in the next few years and another, Paradise Community Village, is actively under reconstruction. The Cypress Acres Convalescent Hospital, however, is the third project in the town with federal assistance that was destroyed, and it is not anticipated to rebuild. The Town has issued a certificate of occupancy for 242 units in multi-family buildings since the Camp Fire, all of which are rental housing units.<sup>3</sup> These 242 units represent approximately 32

<sup>2</sup> Lee & Van Zandt, 2018. Social Vulnerability to Disasters: A Review of the Evidence.

<sup>3</sup> Hartman, Susan, Community Development Director, Town of Paradise. 2021. Personal communication with Urban

Planning Partners, October 26. Updated based on permit counts as of December 29, 2021.

## 2. HOUSING NEEDS ASSESSMENT

percent of the approximately 750 multi-family units lost in the fire, according to data from Urban Footprint.

- In addition to the availability of housing that is affordable, the lower incomes of the residents of Paradise (\$49,270), when compared to the average Californian (\$71,228), have implications regarding where those displaced by the Camp Fire will be able to relocate.<sup>4</sup> If the cost of rebuilding is too high, former Paradise residents may permanently move out of the state in search of cheaper housing options.

Information on access to job opportunities, overcrowding, displacement, and other disproportionate housing needs are summarized above and found in detail in Appendix A: Housing Needs.

Due to all the forces and findings described above, it is important that the Town of Paradise prioritize rebuilding rental housing and providing financial assistance for renters to return to the community. Chapter 6: Housing Element Goals, Policies and Programs describes the Town's goals and efforts to rebuild, conserve existing stock and affordability, and provide adequate housing for all persons. This 2022-2030's Housing Element goals, in tandem with the Safety Element, work to affirmatively further fair housing in Paradise. Specifically, the policies listed below seek to foster an inclusive community, further housing choice, and address racial and economic disparities by increasing the availability and diversity of housing, prioritizing multi-family housing in areas near services, enforcing fair housing laws, and establishing programs to house special needs groups (e.g., seniors, individuals with disabilities, large families, the unhoused).

- HP-1. The Town will encourage a full range of housing types, including both lower- and higher-density housing, at rents and sales prices suitable for

a range of household incomes, including extremely low, very low, low, and moderate.

- HP-2. The General Plan will identify lands most suitable for multi-family development and safeguard this type of use on these sites.
- HP-6. The Town will encourage the production and availability of new affordable housing through a variety of measures including the density bonus program and second unit development, providing incentives such as expedited processing, relaxed zoning restrictions where appropriate, support for funding applications, and Community Development Block Grant (CDBG) funds when available.
- HP-8. The Town will encourage providers to give priority to the very low- and low-income housing developments pursuant to Government Code Section 65589.7. The Town will also provide a copy of the 2022–2030 Housing Element to local water providers upon its adoption. Should a public sewer system, such as an off-site clustered system or alternative wastewater treatment system, be developed and made available, the Town will provide its operator with a copy of the Housing Element and encourage the operator to give priority to very low- and low-income housing developments pursuant to Government Code Section 65589.7.
- HP-9. The Town will pursue county, State, and federal programs and funding sources that provide housing opportunities for low- and moderate-income households.
- HP-10. In accordance with applicable federal and State laws, the Town will promote equal housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, or color.
- HP-12. The Town will pursue the development of tiny home villages to be used as affordable housing.

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<sup>4</sup> Perry, Noel et al. (2021). "Rebuilding for a Resilient Recovery: Planning in California's Wildland Urban Interface." *Next10 and Center for Community Innovation. UC Berkeley.*

Retrieved from: <https://www.next10.org/sites/default/files/2021-06/Next10-Rebuilding-Resilient.pdf>.

- HP-15. The Town will design and implement housing programs that maximize access to the market, such as housing rehabilitation, including replacement housing, and down payment assistance for first-time homebuyers.
- HP-17. New housing and rehabilitated housing will be constructed in accordance with design standards and Town-adopted Building Code requirements that will ensure the safety and integrity of each housing unit.
- HP-18. The Town will continue to provide a revolving loan fund for housing rehabilitation and down payment assistance programs.
- HP-19. The Town will support the continuance and expansion of the Housing Authority's rental assistance program.
- HP-20. The Town will regulate conversion of housing stock that, by its nature, is affordable to residents of modest means, such as apartments and mobile homes, to either market-rate, for-sale, or nonresidential uses, by requiring such conversions to provide a housing relocation plan and replacement assistance to residents who would be displaced by the conversion and by requiring that the Town make a finding of clear public benefit.
- HP-23. The Town will consider increased building and landscaping requirements for fire resiliency and add supportive programs to assist households with vegetation management. The Town will consider providing grants or no-interest loans to low-income households for home hardening to ensure the most vulnerable households are not left behind.
- HP-28. The Town will support post-disaster funding for multi-family and affordable housing development.
- HP-29. The Town will continue to encourage the development and expansion of housing opportunities for the elderly and the disabled through techniques such as smaller unit sizes, a reduction in parking space requirements, common dining facilities, and fewer but adequate amenities.
- HP-30. The Town will encourage development of suitable sites with rest homes and care facilities for the elderly and the disabled and developmentally disabled and will encourage senior citizen housing in the Central Commercial area of Paradise.
- HP-31. The Town will facilitate housing opportunities for the homeless by accommodating transitional and supportive housing and allowing emergency, transitional, and supportive housing consistent with state law.
- HP-32. The Town will encourage development housing types and programs for senior citizens, the disabled, developmentally disabled, large families, and other groups identified as having special housing needs.
- HP-33. The Town will continue to require the first floors of multi-family developments to accommodate access and use by the elderly and the disabled.
- HP-34. The Town will continue to assess the Zoning Ordinance, Municipal Code, and Town procedures for constraints and address changes in state law, particularly regarding housing for special needs groups, including seniors, the disabled, developmentally disabled, large families, farmworkers, and the homeless.
- HP-35. The Town will encourage energy efficiency and energy conservation in residential development to ensure sustainable practices and to reduce long-term housing costs.

## REGIONAL HOUSING NEEDS ALLOCATION

The Regional Housing Needs Allocation (RHNA) process is mandated by California law and requires all local jurisdictions to plan for their 'fair share' of housing units at all affordability levels. This Regional Housing Needs Plan (RHNP) is part of the Butte County Association of Governments' (BCAG) 6th Cycle RHNA, sometimes referred to as the "2020 update of the BCAG RHNP," covering the period from December 31, 2021 to June 15, 2030 and assigning housing need allocations to the Cities of Biggs, Chico, Gridley, Oroville, the Town of Paradise, and unincorporated Butte County.

State Housing Element Law requires BCAG to develop a methodology that calculates the number of housing units assigned to each city/town and the unincorporated portion of the county and distributes each jurisdiction's housing unit allocation among four affordability levels.

The fire rebuild allocation is unique to the region during the 6th Cycle RHNA process and stems from the November 2018 Camp Fire, which destroyed over 14,500 homes in the Town of Paradise and unincorporated Butte County.

In December 2020, The Town of Paradise received the following allocation of housing needs, broken down by income category as shown in Table 2-1.

**TABLE 2-1: FINAL TOWN OF PARADISE RHNA BY INCOME TIER**

Income Group	Town of Paradise Units	Butte County Units	Town of Paradise Percent
Very Low Income (<50 percent of AMI)	383	2,081	5.3%
Low Income (50 percent-80 percent of AMI)	374	1,290	5.2%
Moderate Income (80 percent-120 percent of AMI)	1,319	3,202	18.4%
Above Moderate Income (>120 percent of AMI)	5,103	8,933	71.1%
<b>Total</b>	<b>7,179</b>	<b>15,506</b>	<b>100.0%</b>

AMI = Area Median Income. Butte County has an AMI of \$70,700.

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

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## CHAPTER 3 | CONSTRAINTS

New housing development can be constrained by economic forces in the private market as well as regulations and policies imposed by public agencies. These constraints can limit the production of housing and/or increase its cost and can also affect the maintenance and/or improvement of existing housing. Governmental and non-governmental constraints that can affect the housing market and stock in Paradise are discussed below. The Housing Plan (Chapter 6) will identify ways, where feasible, to reduce or overcome constraints to the maintenance, improvement, and development of housing for all income levels.

### GOVERNMENTAL CONSTRAINTS

Governmental regulations, while intentionally regulating the quality and safety of development in the community, can also unintentionally increase the cost of development and thus the cost of housing. These governmental constraints include land use controls, such as policies, standards, codes, requirements, development fees, processing procedures, site improvement requirements, and other exactions required of developers.

Land use controls may limit the amount or density of development, thus increasing the cost per unit. They may also require improvements and/or off-site mitigation that increase the cost of development. Processing procedures, including review by multiple agencies and permitting requirements, may delay the approval process and increase the cost of development.

#### FEDERAL AND STATE

Federal and state programs and agencies play a role in the imposition of non-local governmental constraints. Federal and state requirements are generally beyond the influence of local government and therefore cannot be effectively addressed in this document.

#### California Environmental Quality Act

The California Environmental Quality Act (CEQA) was developed to protect the quality of the environment and health and safety of persons from adverse environmental effects. Under CEQA, discretionary projects are required to be reviewed to determine if there is potential for the project to cause a significant adverse effect on the environment. Depending on the type of project and its potential effects, technical transportation, noise, air quality, biological resources, and geotechnical

### 3. CONSTRAINTS

reports may be needed. If potential adverse effects can be mitigated, a mitigated negative declaration is required. If potentially adverse effects cannot be mitigated, an environmental impact report is required. These documents have mandated content requirements and public review times. Preparation of CEQA documents can be costly and, despite maximum time limits set forth in the Public Resources Code, can extend the processing time of a project by a year or longer.

#### Prevailing Wage Laws

Public works projects and affordable housing financed through the use of public funds are required to pay prevailing wages, which create a significant cost impact on the construction or rehabilitation of affordable housing units for low- or moderate-income persons and the infrastructure to support such housing. The rehabilitation of certain qualifying affordable housing units for low- or moderate-income persons is exempted from this requirement. Senate Bill (SB) 972 provided exemptions from prevailing wage requirements for the construction or rehabilitation of privately owned residential projects.

### LOCAL

#### Land Use Controls

Land use controls are minimum standards included in the General Plan and implemented through the Zoning and Subdivision Ordinances. General Plan land use designations are a means of ensuring that the land uses in the community are properly situated in relation to one another and providing adequate space for each type of development. Zoning regulations are designed to implement the intentions of the General Plan land use designations. They also control such features as the height and bulk of buildings, lot area, yard setbacks, population density, and building use. If zoning standards are significantly more rigid than private sector design standards and do not allow sufficient land use flexibility, development costs could increase, and housing production may decrease.

The Paradise General Plan provides a range of residential building types and densities in various areas of Paradise. Densities range from a low of 1 unit or less per acre in the Agricultural-Residential designation to 15 units per acre in the Multi-Family designation.

The Zoning Ordinance identifies 10 residential districts (Agricultural Residential, Rural Residential, Town Residential, and Multi-Family Residential and their respective subzones) and six other zones (Agricultural, Neighborhood Commercial, Central Business, Community Commercial, Community Facilities, and Community Services) that allow residential development.

Most zones establish maximum residential densities but do not establish minimum residential densities. The density maximums within residential zones (and commercial zones that allow residential uses) are in place due to the existing septic capacity, which is the primary limiting factor for how many units per acre can be built in Paradise.

In addition to maximum residential densities, all zones include height limits of 35 feet. When zoning standards include height limits, consideration is given to how the allowable density and the height will work together to meet the zoning requirements and General Plan intent regarding residential densities. In almost all instances, it would be possible to construct the maximum number of units permitted by the maximum residential density within the height limit of the zones. It is possible that zoning regulations including setbacks, maximum floor area ratio, design requirements, common and private open space requirements, parking requirements, and building code requirements may interact in ways that constrain residential densities. However, an examination of recent development trends shows that projects have not been hampered by zoning standards. Based on building permit data, recent multi-family projects have an average yield of 66 percent of the allowed capacity, indicating that maximum densities have not constrained projects. The Town's zoning accommodates a diversity of housing types to meet the varying needs of Town residents. In addition to the residential zones, many types of residential uses are

also permitted in commercial zones and some industrial zones. Given the Town's recent development activity and variety of housing being built, land use controls are not considered a constraint to housing production.

Appendix C provides a description of the Town's General Plan designations and zoning districts. Table 3-1 summarizes the uses allowed under each zone. Development standards for each district are identified in Table 3-2.

### Parking Requirements

Chapter 17.38 of the Zoning Ordinance establishes parking standards for type of use (see Table 3-3), which have been interpreted as to how they apply to each zone in Table 3-4. The Town's parking requirements for single-family homes are two parking spaces per unit. Secondary units require one parking space per dwelling or bedroom, whichever is less. The parking requirements for multi-family residential units vary based on the size of the unit. For instance, units that are less than 700 square feet require 1.2 spaces per unit, while units of 700–1,200 square feet require 1.5 spaces, and units of 1,200 square feet or more require 1.8 spaces.

The Zoning Ordinance allows the Planning Director to reduce parking by up to 20 percent if the project is found to not need the number of parking spaces that would be otherwise required, the proposed number of spaces meets the demand, and the reduced parking standards will not be detrimental to the public health, safety, or general welfare. There is not a reduced parking standard expressly established for affordable housing projects, but a parking reduction could be requested through the Town's affordable housing incentives program. The Zoning Ordinance does have a reduced parking standard for senior housing (1.2 spaces/unit). Program HI-3 of this Housing Element includes additional incentives for affordable housing, including parking reductions.

Parking standards can be a constraint to housing development given the money and land area that they require. According to data from Strategic Economics,<sup>1</sup> surface parking is estimated to cost \$5,000 per space. However, in a town like Paradise that is more rural in character and not well-served by transit, many residents need a car for personal transportation.

### On/Off-Site Improvements

The Town requires street improvements, right-of-way dedication, and landscaping improvements in certain situations. The Town's on- and off-site improvement standards establish lot configurations that are in conformance with General Plan goals and zoning code requirements, and provide for public utility easements. In addition, these regulations set engineering and design standards for drainage facilities, fire hydrants, utilities, and such other improvements ordinarily located in and appurtenant to the use of a public street or private road. These improvements are necessary for public safety and functionality of the street system. The required improvements are laid out below in Table 3-5. As shown below, rebuilds are not required to provide street improvements or right-of-way dedications unless they are expanding the previous building's footprint by 750 sf or more. New multi-family projects are required to provide street improvements, right-of-way dedication, and landscaping when abutting a Town-maintained road. The Town anticipates multi-family development being concentrated along Clark Road and Skyway in the downtown core within the planned sewer service area and where evacuation access is least constrained. The roads in this area are primarily public streets and so future development could be dampened by required improvements. Program HI-4 in Chapter 6 includes a program to charge commercial impact fee rates for mixed-use projects or to allow shared parked by-right in order to alleviate governmental constraints to multi-family housing in the downtown area. Program HI-1 allows for the deferral of frontage improvements to also remove barriers for special needs housing.

<sup>1</sup> Strategic Economics, 2021. Personal communication with Urban Planning Partners, August.

### 3. CONSTRAINTS

TABLE 3-1: USES ALLOWED BY ZONING DISTRICT

Zoning District	Density (units/ac)	Single-Family	Two-Family	Multiple Family	Secondary Dwelling	Mobile Home	Group Residential	Community Care Facility	Community Care Facility, Limited	Day Care One, Large Family	Day Care One, Small Family	Emergency Shelters	Transitional/ Supportive Housing	SROs/ Group Residential	Agricultural Employee Housing, Limited
Residential Districts															
AR-1	1	✓	UP	NO	AP	✓	NO	UP	✓	NO	✓	NO	NO	NO	✓
AR-3	0.33	✓	UP	NO	AP	✓	NO	UP	✓	NO	✓	NO	NO	NO	✓
AR-5	0.2	✓	UP	NO	AP	✓	NO	UP	✓	NO	✓	NO	NO	NO	✓
RR-1	1	✓	S	NO	AP	✓	UP	UP	✓	S	✓	NO	NO	UP	✓
RR-2/3	1.5	✓	S	NO	AP	✓	UP	UP	✓	S	✓	NO	NO	UP	✓
RR-1/2	2	✓	S	NO	AP	✓	UP	NO	✓	S	✓	NO	NO	UP	✓
TR-1	1	✓	UP	NO	AP	✓	UP	NO	✓	NO	✓	NO	NO	UP	✓
TR-1/2	2	✓	✓	NO	AP	✓	UP	NO	✓	NO	✓	NO	NO	UP	✓
TR-1/3	3	✓	✓	NO	AP	✓	UP	NO	✓	NO	✓	NO	NO	UP	✓
M-F	15	✓	✓	AP	✓	✓	S	UP	✓	AP	✓	NO	NO	S	✓
Other Districts Allowing Residential Uses															
AG-10	0.1	✓	NO	NO	✓	✓	NO	NO	✓	NO	✓	NO	NO	NO	✓
AG-20	0.05	✓	NO	NO	✓	✓	NO	NO	✓	NO	✓	NO	NO	NO	✓
N-C	8-14.52	S	NO	NO	NO	✓	NO	UP	NO	UP	NO	NO	NO	NO	S
C-B	8-14.52	AP	S	S	NO	✓	NO	NO	NO	UP	NO	NO	NO	NO	AP
C-C	8-14.52	NO	S	S	NO	✓	S	UP	NO	AP	NO	UP	NO	S	NO
C-F	15	✓	NO	NO	✓	✓	NO	UP	✓	AP	NO	AP	NO	NO	✓
C-S	15	✓	AP	S	✓	✓	S	S	✓	AP	✓	✓	NO	S	✓

Notes: NO = Not Allowed  
 UP = Use Permit  
 S = Site Plan Review Permit  
 ✓ = Allowed  
 AP = Administrative Permit  
 PSC = Permitted (Standards and Conditions)

Program HI-15 is proposed to allow transitional and supportive housing in all zones allowing residential uses in the same way other residential uses are allowed in those zones.

Source: Town of Paradise Zoning Ordinance, 2014.

TABLE 3-2: DEVELOPMENT STANDARDS BY ZONING DISTRICT

Zoning District	Minimum Site Area (ac)	Minimum Site Width (ft)	Front Yard Setback from Centerline (ft)		Side Yard Setback (ft)	Rear Yard Setback (ft)	Maximum Height	Off-Street Parking per Unit	Maximum Building Coverage (%)	Maximum Floor Area Ratio
		Public Street	Private Street							
Residential Districts										
AR-1	1	130	50	30	10	10	35	2-3	none	none
AR-3	3	150	50	30	10	10	35	2-3	none	none
AR-5	5	150	50	30	10	10	35	2-3	none	none
RR-1	1	130	50	30	10	10	35	2-3	20	none
RR-2/3	0.66	95	50	30	5	5	35	2-3	20	none
RR-1/2	0.5	65	50	30	5	5	35	2-3	25	none
TR-1	1	65	50	30	5	5	35	2-3	25	none
TR-1/2	0.5	65	50	30	5	5	35	2-3	25	none
TR-1/3	0.33	65	50	30	5	5	35	2-3	30	none
M-F	0.069 - 0.1	65	50	30	5	5	35	1.2–1.8	35	0.5 to 1
Other Districts Allowing Residential Uses										
AG-10	10	150	50	30	10	10	35	2-3	none	
AG-20	20	200	50	30	10	10	35	2-3	none	
N-C	0.1	65	50	30	5	5	35	2-3	50	
C-B	0.067 - 0.1	55	40	25	0	0	35	1.2–1.8	60	0.75 to 1
C-C	0.1	65	50	30	0	0	35	1.2–1.8	50	0.5 to 1
C-F	0.5 with densities up to 15 units/acre	none	50	30	10	10	35	1.2–1.8	50	none
C-S	0.5 with densities up to 15 units/ acre	none	50	30	10	10	35	1.2-1.8	50	none

Note: Parking requirements are driven by the size and type of dwellings. Mobile homes, single-family homes, and two-family dwellings are required to have two spaces/dwelling while multi-family dwellings have a range of requirements depending on the unit size. Fewer parking spaces are required for senior housing and group residential uses. See Tables 3-3 and 3-4. The parking ratios in the table above reflect the housing types most likely to be developed in each zone.

Source: Town of Paradise Zoning Ordinance, 2013.

### 3. CONSTRAINTS

**TABLE 3-3: PARKING REQUIREMENTS BY FACILITY**

Facility	Parking Requirement
Community care facility	2 per dwelling, plus 1 per 4 persons cared for at capacity, plus 1 per employee at maximum shift
Family day care home (small or large family)	No requirement
Convalescent service	1 per 2.5 beds plus 1 per employee during maximum employee shift
Secondary dwelling	1 per dwelling
Single-family, two-family	2 per dwelling
Group residential	0.5 per sleeping unit
Senior housing	1.2 per dwelling
Multiple-family dwelling	Less than 700 square feet – 1.2 per unit; 700 to 1,200 square feet – 1.5 per unit; more than 1,200 square feet – 1.8 per unit

Note: Family day care homes do not have a parking requirement beyond the 2 spaces/dwelling required for single-family homes. The family day care home facility allows for care of up to 14 children in the provider's home.

Source: Town of Paradise Zoning Ordinance (17.38.1000), 2021.

**TABLE 3-4: PARKING REQUIREMENTS BY ZONING DISTRICT**

Zoning District	Off-Street Parking per Unit
<b>Residential Districts</b>	
AR-1	2–3
AR-3	2–3
AR-5 RR-1 RR-2/3 RR-1/2 TR-1	2–3
TR-1/2 TR-1/3 M-F	2–3 or 1.2–1.8
<b>Other Districts Allowing Residential Uses</b>	
AG-10 AG-20 N-C	2–3
C-B	2–3
C-C	1.2–1.8
C-F	1.2–1.8
C-S	1.2–1.8

Source: Town of Paradise, 2021.

**TABLE 3-5: REQUIRED ON- AND OFF-SITE IMPROVEMENTS**

Improvements	Multi-Family Residences		Single-Family Residences	
	Rebuild	New	Rebuild	New
<b>Street Improvements:</b> PMC 12.20.100 (pavement, curbs, gutters, sidewalks or pathways, driveways, drainage facilities, fire hydrants, utilities and such other improvements ordinarily located in and appurtenant to the use of a public street or private road).	NO, unless Rebuild is increasing conditioned square footage by 750 square feet or greater, and the parcel is abutting a Town-maintained road per PMC Section 12.20.050 exemptions.	YES, if New Build is located on a parcel abutting a Town-maintained road per PMC Section 12.20.040.	Only a driveway encroachment if Rebuild is increasing conditioned square footage by 750 square feet or greater, and the parcel is abutting a Town-maintained road per PMC Section 12.20.050 exemptions.	Only a driveway encroachment if New Build is located on a parcel abutting a Town-maintained road per PMC Section 12.20.040.
<b>Right-of-Way Dedication:</b> PMC 12.20.040	NO, unless Rebuild is increasing conditioned square footage by 750 square feet or greater and the parcel is abutting a Town-maintained road per PMC Section 12.20.050 exemptions	YES, if New Build is located on a parcel abutting a Town-maintained road per PMC Section 12.20.040	NO, unless Rebuild is increasing conditioned square footage by 750 square feet or greater, and the parcel is abutting a Town-maintained road per PMC Section 12.20.050 exemptions	YES, if New Build is located on a parcel abutting a Town-maintained road per PMC Section 12.20.040
<b>Landscape:</b> PMC 15.36.020	YES, if replacing damaged landscaping or expanding the landscaped areas.	YES, applies to all development projects proposed to be established within the town requiring formal review and approval by the planning commission	NO	NO

Source: Town of Paradise, 2022.



The Town's on- and off-site improvement standards are typical of other similar size communities in California, and do not present an undue burden on developers. Because residential development cannot take place without the addition of adequate infrastructure, site improvement requirements are considered a regular component of housing development and are not considered a constraint to development.

### **Affordable Housing and Density Bonus**

Zoning Ordinance Chapter 17.44 includes provisions for affordable housing incentives and residential density bonuses. The purpose of providing a housing density bonus or incentives is to contribute to the economic feasibility of affordable housing in housing developments proposed in the town. When a developer proposes to enter into an agreement to construct affordable units pursuant to Government Code Section 65915, the developer is eligible for a housing density bonus or incentives if the housing development consists of five or more units.

The developer may specify the housing density bonus or incentives requested; however, the Town may agree to provide a housing density bonus or incentives other than those requested, as long as such housing density bonus or incentives meet the requirement set forth in Government Code Section 65915 and such action is determined to be consistent with the Housing Element of the Paradise General Plan. Prior to Town action on an agreement providing housing density bonus or incentives, the planning commission must consider the agreement and make a recommendation to the town council.

### **Subdivision Ordinance**

The Subdivision Ordinance regulates the subdivision of land and real property in the town for the purposes of sale, lease, or financing in all instances except those which are exempt under the provisions of the Subdivision Map Act of the State of California as set forth in Title 7 of the Government Code. The ordinance provides for regulation and control of design and improvement of subdivisions to control growth, protect

public health and safety, conserve resources, and require on- and off-site improvements to be installed in proper condition.

Requirements for street right-of-way dedication and street improvements can add to the cost of housing. The Subdivision Ordinance does, however, exempt reconstruction and minor expansion of less than 750 square feet from these requirements (see Table 3-5). There are over 6,200 sites that were previously developed with single-family homes that were destroyed in the Camp Fire. Given that these will comprise the vast majority of the new housing units in the 2022-2030 Planning Period and will be exempt from requirements for right-of-way dedication and street improvement requirements, these requirements will not be a significant impediment to housing production. As mentioned above, Programs HI-1 and HI-4 provide incentives to facilitate the development of multi-family housing since these projects more often require onsite improvements.

### **Annexations**

The Butte County Local Agency Formation Commission (LAFCo) regulates the boundary changes proposed by public agencies or individuals. LAFCo does not have the power to initiate boundary changes on its own, except for proposals involving the dissolution or consolidation of special districts and the merging of subsidiary districts. Their authority includes both sphere of influence (SOI) amendments and annexations.

LAFCo's efforts are directed toward seeing that services are provided efficiently and economically while ensuring that agricultural and open-space lands are protected. LAFCo must conduct service reviews to evaluate the provision of municipal services with respect to nine areas: (1) infrastructure needs or deficiencies; (2) growth and population projections for the affected area; (3) financing constraints and opportunities; (4) cost avoidance opportunities; (5) opportunities for rate restructuring; (6) opportunities for shared facilities; (7) government structure options, including advantages and disadvantages for consolidation or reorganization of service providers;

### 3. CONSTRAINTS

(8) evaluation of management efficiencies; and (9) local accountability and governance.

While LAFCo serves an important role in local land use planning and the provision of services, SOI and annexation approvals are considered a governmental constraint to housing development because of the lengthy time period and service review requirements.

## ZONING FOR A VARIETY OF HOUSING TYPES

In addition to traditional housing typologies, the Zoning Ordinance includes housing typologies that tend to be more affordable and/or accommodate special housing needs. These housing types are described below. See Appendix C for a full list of residential uses allowed in the Zoning Ordinance.

### MOBILE/MANUFACTURED HOMES

A mobile/manufactured home is a transportable factory-built housing unit designed and equipped for use as a dwelling. Recreational vehicles (RVs) are not considered manufactured homes. Mobile/manufactured homes are permitted in all zones allowing single-family dwellings when such mobile home meets the following minimum requirements in addition to all other provisions applicable to the site.

1. The mobile/manufactured home or transportable factory-built housing unit shall be structurally certified per requirements of the National Manufactured Housing Construction and Safety Act of 1974.
2. The mobile/manufactured home shall be installed on an approved permanent foundation.
3. Roofs shall have a minimum pitch of 3 in 12 and shall be shingled or tiled in a manner sufficient to have the same appearance as a standard dwelling built on the site.
4. Siding material shall be of masonry, wood, stucco, or similar material having the same appearance as a standard dwelling built on the site.

5. The mobile/manufactured home installation shall be no older than ten years of age. The age measurement period shall be from the year of manufacture of the mobile/manufactured home to the year of the permit application.

Mobile home parks cannot exceed a maximum density of 2 to 8 units per acre, pursuant to Section 17.34.300 of the Zoning Ordinance, depending on which zone they are located in.

### FAMILY DAY CARE HOMES

The Zoning Ordinance permits day cares by-right in every zoning district, as any zone permits either primary, accessory, or secondary residences.

### SECONDARY UNITS

The construction of secondary residential dwelling units in Paradise is permitted by-right in the M-F, AG-10, AG-20, C-F, and C-S zones without a use permit and is allowed in the AR-1, AR-3, AR-5, RR-1, RR-2/3, RR-1/2, TR-1, TR-1/2, and TR-1/3 zones subject to approval with an administrative permit. A secondary dwelling can be attached or detached to the primary residence. If the secondary dwelling is detached, the square footage maximum is 850 square feet for one bedroom, and 1,000 square feet for two or more bedrooms. The secondary dwelling must meet the same development standards as any dwelling located on the same parcel in the same zoning district. The Town's Zoning Ordinance is consistent with the requirements of Assembly Bill (AB) 1866. Grant funding was secured in 2020 through the wildfire Resiliency & Planning Grant that will fund the creation of an ADU handbook and mastered ADU plans. The town is currently working on this with completed schedule for 2021. The mastered ADU plans will also be updated in 2022 to comply with building code updates.

### FARMWORKER HOUSING

The AG-10 and AG-20 zones allow single-family dwellings and secondary units. The secondary units



provide housing opportunities for farmworkers employed on the premises.

### **FACILITIES FOR DISABLED HOUSEHOLDS**

Community care facilities are defined in the Zoning Ordinance as a facility, place, or building that is maintained and operated to provide nonmedical residential care, adult day care, child day care, intermediate care, congregate living, health care, or home-finding agency services for children, adults, or children and adults, including but not limited to the physically handicapped, mentally impaired, or incompetent persons and does not include drug recovery facilities. Community care facilities are allowed in the M-F, AR-1, AR-3, AR-5, RR-1, and RR-2/3 residential zones with the issuance of a use permit. Other zones that allow community care facilities include the I-S, N-C, C-C, and C-F zones with the issuance of a use permit, and the C-S zone with a site plan review. Larger community care facilities require use permits because, consistent with the Town's General Plan, they must be located on arterial and collector streets and near commercial services. The Town's lower-density residential zoning districts (e.g., AR-1, AR-3, AR-5, RR-1, RR 2/3) are farthest from the downtown core and therefore by-right permitting of community care facilities with seven or more persons would present issues with safe and effective evacuation, proximity to services, and consistency with General Plan policies. However, Program HI-18 of the Housing Element would allow State-licensed residential care facilities for seven or more persons in the Sewer Service Overlay zone to be subject only to the restrictions that apply to residential uses in the same zone. This program will make it easier to locate care facilities while ensuring the facilities are appropriately located. The Town has not established any minimum spacing requirements for community care facilities or group residential uses.

Limited community care facilities are defined in the Zoning Ordinance as a community care facility which provides service for six or fewer persons, with the residents and operators of the facility being considered a family. These facilities are allowed in all residential

zones by-right as well as in other zones that allow residential uses.

The Zoning Ordinance allows day care homes for small families or large families in all zoning districts.

The Zoning Ordinance defines "family" as an individual or two or more persons living together as a single household within a dwelling unit. A dwelling unit is defined as a residential building that provides complete, independent living facilities for one family, including permanent provisions of living, sleeping, eating, cooking, and sanitation. The Town does not distinguish between related and unrelated persons and does not limit the number of persons that may constitute a family.

The Town follows the requirements of the Americans with Disabilities Act (ADA) in regard to the development of accessible housing. Improvements, such as a wheelchair ramp or grab bars, to make a residence accessible to disabled persons are ministerial and typically require a building permit. Building permit applications for minor improvements can typically be issued over the counter. Paradise Municipal Code Title 15, Buildings and Construction, identifies improvements that do not require a building permit. No accessibility improvements are exempt from building permit requirements. Program HI-17 was included in the previous Housing Element advocating that the Town amend Title 15 of the Municipal Code to identify specific listed improvements which are exempt from building permit requirements, amend the Zoning Ordinance to allow reasonable accommodations in zoning and land use, and create a handout identifying accessibility improvements that can be permitted over the counter. That program was not implemented and is being continued in this Housing Element 2022-2030.

### **Disabled Parking Standards**

The Zoning Ordinance establishes parking standards for each type of facility in a zone in accordance with the regulations of Section 1129B of Title 24, California Code of Regulations. Table 3-4 provides those parking requirements. Parking standards for housing for

### 3. CONSTRAINTS

disabled persons are the same as all for residential development and do not pose a constraint on development of housing for disabled persons.

Program HI-15 of the previous Housing Element called for the Town to reduce the parking requirement for affordable housing projects, including for senior housing and disabled housing. The Town reduced the standard for senior housing but has not reduced the standard for affordable housing. Chapter 6 of this Housing Element 2022-2030 carries this policy forward (see HI-3).

#### **FACILITIES FOR HOMELESS AND HOUSEHOLDS AT RISK OF HOMELESSNESS**

Facilities and housing for homeless persons and those at risk of homelessness fall into three categories: emergency shelter, supportive housing, and transitional housing.

##### **Supportive and Transitional Housing**

"Supportive housing" means housing with no limit on length of stay, that is occupied by the target population, and that is linked to on- or off-site services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community (Health and Safety Code Section 50675.14).

"Transitional housing" and "transitional housing development" mean buildings configured as rental housing developments, but operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months (Health and Safety Code Section 50675.2).

State law requires the consideration of both supportive and transitional housing as residential uses that must only be subject to the same restrictions that apply to similar housing types in the same zone. The Paradise Zoning Ordinance does not identify zones that will

allow the development of supportive or transitional housing. Implementation Program HI-15 in Chapter 6 proposes to establish both supportive and transitional housing uses by-right in zones where multi-family and mixed uses are permitted, including nonresidential zones permitting multi-family uses pursuant to Government Code section 65651, and to establish a permit process that is only subject to those restrictions which apply to other residential uses of the same type in the same zoning district. The implementation program will result in a revision to the Zoning Ordinance to bring it into consistency with State law.

##### **Emergency Shelters**

Every local agency must identify a zone or zones where emergency shelters are allowed as a permitted use without a conditional use or other discretionary permit. The identified zone or zones must include sufficient capacity to accommodate the need for emergency shelter as identified in the housing element, except that all local governments must identify a zone or zones to accommodate at least one year-round shelter. Adequate sites/zones can include existing facilities that can be converted to accommodate the need for emergency shelters.

The Paradise Zoning Ordinance includes provisions for emergency shelters in the following zones: C-C (with a conditional use permit), C-F (with administrative approval), and C-S (permitted by-right). Paradise amended the Zoning Ordinance in 2010 to allow emergency shelters in the C-S zone by-right to be consistent with State law. Emergency shelters are compatible with the range of uses allowed in the C-S zone and sites in this zone are generally proximate to services. Sites designated C-S have adequate capacity to accommodate the Town's emergency shelter needs; there are a total of 136 parcels in the C-S zone covering 459 acres. The minimum net lot area in the C-S zone is 0.5 acres and a sample of sites zoned C-S in the sewer service area indicates parcels sizes range from 1.91 to 8.83 acres. This is within the 0.5- to 10-acre range that HCD considers feasible for affordable housing.

Figure 3-1 shows the proximity of the C-S zones to services such as grocery stores, schools, and parks. A walkability analysis conducted in Urban Footprint found that 49 percent of C-S parcels are within a 20-minute walk to public schools, 38 percent are within a 10-minute walk to parks, and 31 percent are within a 10-minute walk to retail. As the town continues to rebuild, access to health services and groceries is still constrained. Fewer C-S parcels are within a 20-minute walk to a hospital (10 percent) or a supermarket/grocery store (12 percent). As rebuilding continues, access to groceries and healthcare is anticipated to improve town-wide.

As shown in Figure 3-2, bus service runs along Skyway and Clark Road to connect Paradise to neighboring

communities, including Chico, Oroville, and Magalia. Within town, bus service creates a loop around Skyway, Pearson Road, Clark Road, and Wagstaff Road, with transfer points at the intersections of Skyway/Wagstaff Road and Clark Road/Wagstaff Road. Most of the C-S parcels about the bus service loop or the routes on Clark Road and Skyway. The Paradise Transit Center is north of the Birch Street/Almond Street intersection, adjacent to several C-S parcels and walking distance to many others along Pearson Road. The C-S parcels on the east side of town along Pentz Road are not served by transit and do not have as many services, but they are along a key evacuation route (Pentz Road). For these reasons, the C-S zone is considered the appropriate zone for ministerial approval of emergency shelters.

Figure 3-1: C-S Zones and Proximity to Services

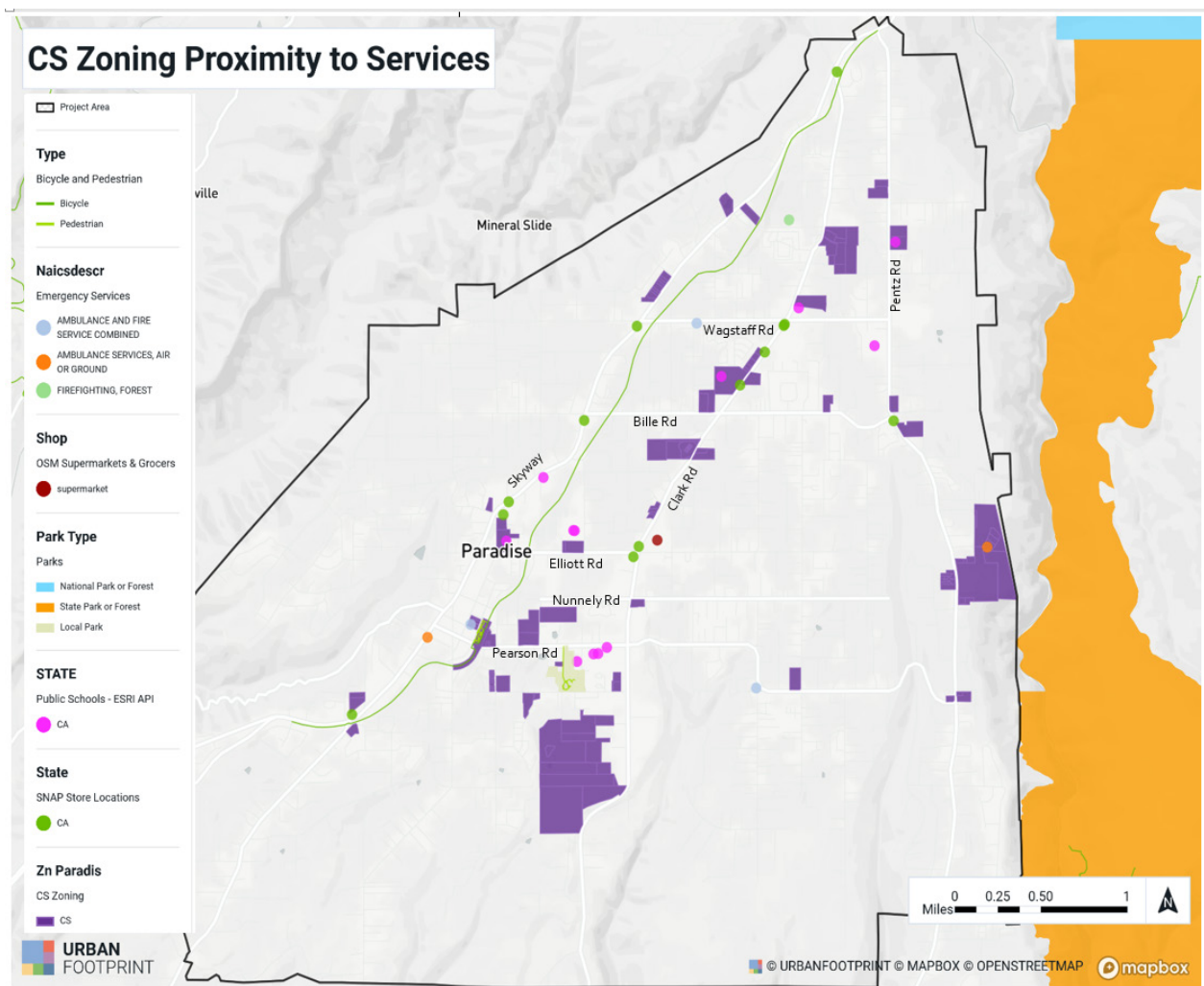
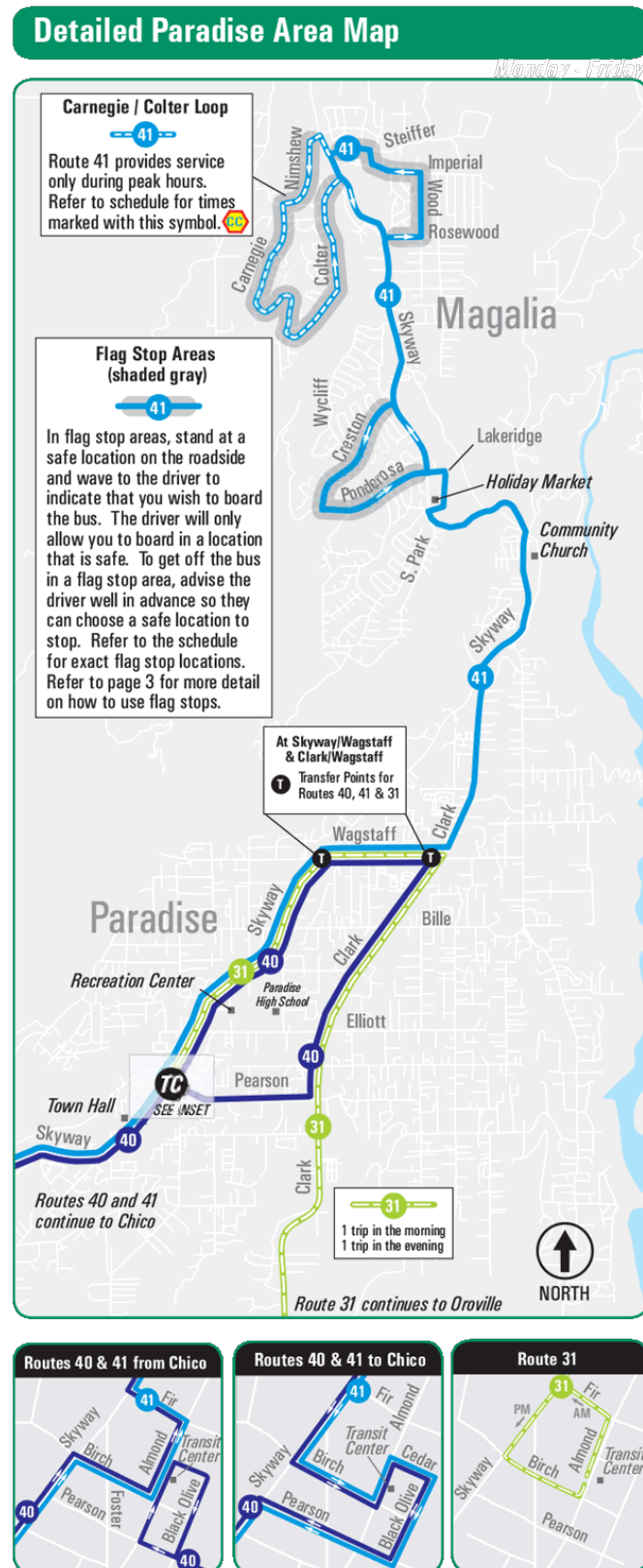


Figure 3-2: Paradise Bus Service



## INTERIM HOUSING

Section 8.61 in the Town's Health and Safety Code relaxed some building and zoning regulations to allow for additional temporary housing given the immediate need for housing in the wake of the Camp Fire. Temporary housing, which is defined to include recreational vehicles and moveable tiny homes not on a permanent foundation, is allowed on qualifying parcels with a temporary use permit to house those displaced by the Camp Fire. Certain standards apply for residential use of temporary dwellings, including written consent from the property owner who owned the property at the time of the Camp Fire; proof of a damaged or destroyed residence; hook-ups to an approved source of water (e.g., public water supply, existing well); sewer disposal hook-ups (e.g., public sewer system, new or existing on-site sewage disposal system that has been approved by the town to be intact and functioning correctly); and connection to an approved source of electricity.

After October 1, 2021, the continued use of a temporary dwelling, as authorized with a temporary use permit, utilizing hook-ups for water, sewage disposal, and/or electricity on an Eligible Property shall be allowed until April 30, 2023, if there are no open code enforcement violations on the site as of September 30, 2021.

## Housing Opportunities for Extremely Low-Income Households

Extremely low-income households can be housed in affordable housing developments with deep subsidies, such as Section 8 or Section 232. Other housing opportunities for extremely low-income households include housing with shared facilities, such as living or dining areas, with private sleeping areas and are often referred to as single-room occupancies (SROs). This type of development allows rents to be much lower than those associated with typical apartment complexes. The Town's Group Residential use allows for facilities such as SROs and is permitted in the M-F, C-C, and C-S zones with a site plan review and in the R-R and T-R zones with a conditional use permit. As discussed in Chapter 4, there are vacant sites in Paradise with these



land use designations that accommodate group residential uses.

## PERMIT APPROVAL PROCESS

### PLANNING APPROVAL

Different approvals are required for residential projects depending on which zoning district they are in. See Table 3-1 for which approvals are required in which zoning districts. An Administrative Permit is an approval issued by the Planning Director with very little or no personal judgement or discretion. The Planning Director (Director) is able to grant approval of a project upon determining whether it complies with existing standards and criteria. A Conditional Use Permit (also called a Use Permit), however, requires more discretion. This permit often imposes conditions on a project which are designed to assure compatibility with the Town's General Plan and Zoning Ordinance and to minimize the impacts to neighboring land uses. Given the discretion involved with Conditional Use Permits, a hearing before the Planning Commission or Town Council may be required and the approval process takes longer.

The review and approval of a use permit involves the filing of a complete application, staff review and report writing for Director review, and determination on the application. If the Director determines that the use permit application is controversial or deals with major policy questions, the application may be referred to the Planning Commission for public hearing and action. Notice for the public hearing shall be in accordance with Section 17.45.700 of the Town Code. Decisions of the Community Development Director may be appealed to the Planning Commission or Town Council.

Use permits may be granted based on both of the following findings:

- The proposed land use is consistent with the provisions of this title as well as the goals and policies of the Paradise general plan.

- The proposed land use is compatible with surrounding land uses and shall not be detrimental to the public's health, safety and general welfare.

### BUILDING CODES

Building codes regulate the erection, construction, enlargement, alteration, repair, moving, removal, demolition, conversion, occupancy, equipment, wiring, plumbing, height, area, use, and maintenance of all buildings and/or structures in the town. In November 2019, the Town adopted a new building code—the 2019 California Building Standard Code (Title 24, Part 2) and the California Green Building Standards Code (Cal Green, Title 24, Part 11), with local amendments in response to specific climatic, geographical, and topographical conditions. The California Building Standard Code (CBSC) is based on the 2018 International Building Code (IBC). The CBSC, as published by the California Building Standards Commission, is applied statewide. The building code includes provisions to reasonably accommodate disabled people in accordance with ADA requirements.

Compliance is verified by the Town first through the plan check process for new construction, remodeling, and rehabilitation projects. The plan check process ensures that the plan and specifications are designed according to code. The second step is scheduled inspections during construction to ensure that the structure is built to the plan specifications. Inspections are also conducted in response to public complaints or an inspector's observation that construction is occurring without proper permits. Local enforcement of these codes does not add significantly to the cost of housing in Paradise and maintains an acceptable standard of health and safety for all inhabitants.

### LOCAL PROCESSING AND PERMIT PROCEDURES

Projects that do not require a land use entitlement, and are permitted-by-right, can obtain building permits directly through the normal plan check process. New residential projects not permitted-by-right are reviewed by the Planning Division to determine that the use is appropriate for the location and compatible with the

### 3. CONSTRAINTS

existing and proposed land uses onsite and in the vicinity. The magnitude and complexity of the development proposal can affect the length of development review. Factors that can affect the length of development review on a proposed project include the completeness of the development application and the responsiveness of developers to staff comments and requests for information. Approval times are substantially lengthened for projects that are not exempt from the California Environmental Quality Act (CEQA), require rezoning or general plan amendments, or subject to a public hearing before the Planning Commission or Town Council.

The typical proposal for a single-family or multi-family residential development entitlement review is provided below:

- New single-family residences that comply with development standards are processed through the normal ministerial plan check process. Building staff is the approval body for single-family developments and do not require public hearings.
- New multi-family developments (3 or more units) located in the M-F zoning district are subject to a ministerial land use entitlement and design review approval. Planning staff is the approval body for these types of developments and do not require a public hearing. Approximate processing time to get to a decision is typically 6-8 weeks; following planning approval, the project would go through normal plan check process.
- New multi-family developments (3 or more units) that are in the C-C, C-S, or C-B zoning districts are subject to a discretionary land use entitlement and design review approval. The Planning Commission is the approved body for these types of developments, with a public hearing before the 5-member commission. Approximate processing time is 6-8 weeks if exempt from CEQA or 4-6 months if subject to environmental review. Following Planning Commission approval, the project would go through the normal plan check process.

All planning permit applications are first reviewed by Town staff for completeness, and discretionary applications must then receive a recommendation through a staff report prior to a review by the appropriate authority. Various applications may also require public hearing noticing and a public hearing. Table 3-6 below identifies the appropriate review process for each planning permit application.

#### PROCESSING TIMES

The residential development process has various stages, each of which requires some form of Town review. Initial processing of a development application depends on the type of project proposed (e.g., planned development, subdivision, single-family unit) as well as whether additional requirements will need to be met (e.g., rezoning of land, environmental review). Therefore, processing review times can vary depending on many different factors. Processing times for development review in Paradise vary based on the size of the project and the extent of review required. The review period can range from 1 to 4 months, depending on the development type, with a maximum estimated wait time of 2 months for a single-family project. For a straightforward permit, such as a single-family home on appropriately zoned land, average estimated time is approximately 1 month. For a multi-family development, the maximum estimated time is approximately 4 months. Table 3-7 summarizes the approval requirements and estimated permit processing times of these typical housing types.

The Building, Wastewater, Planning, and Fire Protection staff have all been consolidated to one facility, under the Building Resiliency Center, which saves applicants time.

Although considered necessary to ensure compatibility with existing regulations, the permit approval process can be a constraint to housing given the time and steps required.

**TABLE 3-6: PLANNING APPLICATION REVIEW PROCESS**

Permit or Approval Type	Type of Action	Final Review Authority			Approximate Timeline
		Planning Division	Planning Commission	Town Council	
Administrative Permit	Ministerial	X			6-8 weeks
Administrative Noise Variance	Discretionary		X		6-8 weeks
Annexation Application	Discretionary			X	6-8 months
Home Occupation Permit	Ministerial	X			3-4 weeks
Design Review	Discretionary	X			3-4 weeks
GPA/Rezone	Discretionary			X	4-6 months
Landscape Plan	Ministerial	X			3-4 weeks
Parcel Map	Discretionary		X		4-6 months
Remote Parking	Ministerial	X			3-4 weeks
Permit to Mine	Discretionary		X		4-6 months
Reasonable Accommodation	Discretionary	X			2-3 weeks
Site Plan Review Permit	Discretionary		X		6-8 weeks
Temporary Use Permit	Discretionary	X			2-3 weeks
Subdivision Map	Discretionary			X	6-8 months
Tree Felling Hearing	Discretionary		X		4-6 weeks
Use Permit	Discretionary		X		6-8 weeks
Variance	Discretionary		X		6-8 weeks
Zoning Interpretation	Discretionary		X		6-8 weeks

Source: Town of Paradise, 2020.

**TABLE 3-7: APPLICATION PROCESSING TIMES**

	Single-Family Unit	Multi-Family
Typical Approval Requirements	Sanitation Land Use Review Site Plan Construction Documents Fire Protection Documents	Sanitation Land Use Review Land Use Entitlement Design Review Construction Documents Fire Protection Documents Engineered On/Off-Site Improvement Plans
Total Estimated Time	Maximum 2 Months	Maximum 4 Months

Source: Town of Paradise, 2020.

### 3. CONSTRAINTS

#### GOVERNMENTAL FEES

Although governmental fees do contribute to the total cost of housing development, the extent to which these costs are passed on to the consumer depends on the price sensitivity of each housing type and the ability of housing developers to absorb such cost increases and still maintain acceptable profit margins. Where increased costs cannot be absorbed by the consumer or developer, housing production will decline. In “price-sensitive” markets, such as that for affordable housing, when increased costs cannot be absorbed by the developer or products modified to compensate the developer, affordable housing is not built.

Government Code Section 66020 requires that planning and permit processing fees do not exceed the reasonable cost of providing the service, unless approved by the voters; agencies collecting fees must provide project applicants with a statement of amounts and purposes of all fees at the time of fee imposition or project approval. Table 3-8 presents the 2017/2018 permit processing, planning/zoning, and building fees for the Town of Paradise, which is the last time the fee levels were updated.

**TABLE 3-8: PLANNING AND BUILD SERVICES FEE SCHEDULE**

Description of Service	Fee
<b>Permits and Variances</b>	
Use Permit Class A	\$880.34
Use Permit Class B	\$1,559.84
Use Permit Class C	\$2,495.73
Administrative Permit Major	\$811.12
Administrative Permit Minor	\$352.147
Administrative Permit Modification Major	\$374.36
Administrative Permit Modification Minor	\$176.07
Administrative Variance Noise Ordinance	\$169.13
Major Variance Permit Class B	\$1,622.22
Minor Variance Permit Class A	\$1291.17
Mello-Roos District Creation Application Fee	\$1,060.70
<b>Design and Site Plan Review</b>	
Design Review Application – Façade	\$273.38
Design Review Application – Architecture	\$437.40

**TABLE 3-8: PLANNING AND BUILD SERVICES FEE SCHEDULE**

Description of Service	Fee
Development Agreement	\$16/acre plus \$1395.30
Development Agreement per acre fee	\$19.92
Development Impact Fee Adjustment/Waiver/In-Lieu Credit Application	\$212.13
Site Plan Review Class A	\$821.66
Site Plan Review Class B	\$1,247.87
Site Plan Review Class C	\$1,934.20
Preliminary Development Review Major w/Meeting	\$1,115.10
Preliminary Development Review Minor w/o Meeting	\$645.58
<b>Environmental Review</b>	
EIR Requirement Appeal	\$1,123.08
EIR Study Review	\$748.72
CEQA Analysis/Document [Projects w/o Land Use Entitlement]	\$748.72
<b>Plans, and Plan Amendments</b>	
General Plan Amendment & Rezoning	\$3,618.80
General Plan Amendment (text only)	\$1,747.01
General Plan Interpretation (Commission)	\$528.20
<b>Maps and Boundaries</b>	
Tentative Map 20 Lots or More	\$3,431.63
Tentative Map 5 to 19 Lots	\$3,182.05
Minor Map Modification Review	\$469.51
Major Map Modification Review	\$1,123.08
Parcel Map	\$2,582.33
Landscape Plan	\$318.20
Administrative Zoning Interpretation	\$293.44
Modification to Planned Development Minor	\$234.76
Modification to Planned Development Major	\$623.93
Annexation Application	\$2,745.30
Annexation Fee Developed Land (Commercial, Industrial and Multi-Family) [per square foot of developed area]	\$2.88
Annexation Fee Developed Land (Residential) [per dwelling plus]	\$13.00/acre plus 1,218.00
Annexation Fee Vacant Land (per acre)	\$365.00
Appeal Review (per hour)	\$117.38
Code Compliance Enforcement (per hour)	\$113.20
Commission Zoning Interpretation	\$410.83

Source: Town of Paradise, 2017/2018 Master Fee Schedule.



Government Code Section 66000 et seq. (Mitigation Fee Act) sets forth procedural requirements for adopting and collecting capital facilities fees and exactions, and requires they be supported by a report establishing the relationship between the amount of any capital facilities fee and the use for which it is collected. Government fees in Paradise include charges from the Town, Paradise Unified School District, Paradise Irrigation District, and Paradise Parks and Recreation District. The Town of Paradise adopted these fees in accordance with the nexus requirements of the Government Code. According to the Town of Paradise Building Resiliency Center, development impact fees (inclusive of the school assessment fee and Rec & Park District Fee) typically total between \$8,257.60 and \$9,688 for a new, 2,000-square-foot single-family home on a never developed lot. Estimates prepared by Strategic Economics with input from the Town found that a typical fourplex multi-family building would be subject to approximately \$4,705 in impact fees while an eight-unit building would be subject to approximately \$10,000. These fees are not excessive compared to other fees collected in other communities in California.

Table 3-9 identifies the typical development fees for three different types of multi-family housing levied by the Town. These fees are a very small portion of development costs and do not represent a significant financial constraint to new housing development. For

**TABLE 3-9: TOTAL PROCESSING AND IMPACT FEES FOR MULTI-FAMILY UNITS IN PARADISE**

Housing Unit Type	Permit Fees	Development Impact Fees	Total Fees (per unit)	Approximate Cost per Unit
Fourplex	\$13,251	\$20,327	\$2,692	<b>\$9,067</b>
8-Unit Multi-Family	\$21,373	\$43,620	\$2,692	<b>\$8,461</b>
12-Unit Multi-Family	\$28,010	\$60,424	\$2,692	<b>\$7,594</b>

Note: Permit fees include the following: Fire Flow (for sprinkler calculations), Building Plan Check Fee, On-site Wastewater Division Fee, Building Permit Issuance Fee, and Fire Sprinkler Plan Review. Development impact fees include a school assessment fee and Paradise Rec & Park District Fee. Building fees include the following: Stormwater Post-Construction Standards, Grading Fee, Engineered Site Plan Review, Erosion Control Plan Review, and Landscaping Plan Review.

Source: Town of Paradise and Strategic Economics, 2021.

comparison, an 8-unit multi-family building developed in Chico would be subject to an equivalent of \$21,025 in fees per unit (compared to \$8,461 per unit in Paradise) and a 12-unit building would be subject to \$15,206 in fees per unit (compared to \$7,594 per unit in Paradise). This means that the development fees in Chico, a neighboring jurisdiction, are over twice as much as the fees in Paradise.

## INFRASTRUCTURE CONSTRAINTS

### WATER

Water is provided by two water purveyors, the Paradise Irrigation District and the Del Oro Water Company. The Paradise Irrigation District is the major supplier of water in town with approximately 9,800 municipal and residential/commercial customers. The Del Oro Water Company serves approximately 140 acres in the southeast corner of Paradise on both sides of Pentz Road.

The Paradise Irrigation District (PID) is an independent special district governed by a five-member Board of Directors elected by the voters of the district. The district is a nonprofit agency that operates for the sole benefit of the lands and people within its boundaries. PID was originally formed in 1916 under the laws of the California Water Code for the purpose of providing agricultural water to approximately 1,000 ridge residents. Today PID delivers water to residential/commercial customers in an 11,250-acre area. 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 acre-feet. Surface water from Paradise Lake is released into Little Butte Creek and flows to Magalia Reservoir. Magalia Dam is currently restricted to 800 acre-feet 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

### 3. CONSTRAINTS

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.

Prior to the 2018 Camp Fire, PID implemented a simple rate structure with a single tier. Following the 2018 Camp Fire, and due to meter damage sustained in the fire, PID's customers pay only the monthly service fee or sealed Paradise Irrigation District 2020 Urban Water Management Plan Demand Management Measures 9-3 rate and are not currently charged for volumetric water usage. PID's Meter Installation and Service Lateral Phase 2 Project, slated to start in 2021, will support the return of the distribution system to metered service, and PID will resume charging customers for volumetric water consumption.

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 planning horizon of this Urban Water Management Plan, 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.

The Del Oro Water Company was established in 1963 to meet the water needs of the Paradise Pines area in Magalia. Del Oro currently serves Paradise Pines, Magalia, and Lime Saddle, which are unincorporated areas adjacent to Paradise. Paradise Pines is an unincorporated rural residential community located immediately north of Paradise. Magalia is an unincorporated area of approximately 400 acres located between Paradise Pines and the Town of Paradise. Lime Saddle is an area of approximately 2,750 acres that extends south from the Town of Paradise to Lake Oroville.

PID and Del Oro have adequate infrastructure systems and water supplies to meet the town's service demand,

including the 2022-2030 RHNA. Water is not considered a constraint to housing development at this time given the findings of the 2020 PID Urban Water Management Plan.

#### WASTEWATER

The Town of Paradise is the largest unsewered incorporated community in California. Wastewater treatment facilities in the town consist of privately owned septic tanks and soil absorption disposal systems known as leach fields, as well as several engineered subsurface disposal systems serving commercial and institutional facilities. These systems are prone to failure and limit development opportunities due to the sizing constraints of the private septic and leach fields. Following the Camp Fire, and building on several previous studies to create an alternative sewer collection and discharge system for the town, the Town proposed a regional wastewater management solution to replace a portion of the Town's septic systems. The proposed sewer collection system and treatment will facilitate regrowth, replace failed septic systems, and improve the local economy. The proposed sewer service area (SSA) will serve approximately 1,400 parcels through the Skyway, Clark Road, and Pearson Road corridors, which represents most businesses in Paradise and provide for future development of more multi-family residences, which is currently limited because of septic system constraints.

Presently, the typical residential septic system installation in Paradise consists of two-chambered septic tanks, approximately 1,000 gallons in volume, connected to about 150 feet of leach field piping. In the septic tank, heavy solids settle and decompose, leading to the formation of a sludge blanket that must be periodically removed. Grease and other floatables are trapped in a scum layer that forms behind the baffles. In a properly designed, well-maintained septic tank, 40 to 70 percent of the total soluble solids (TSS) and 25 to 60 percent of the biological oxygen demand (BOD) are removed. However, septic tank effluent still contains large quantities of pathogenic microorganisms and nutrients. Effluent from the septic tank enters the leach field where physical, chemical, and biological processes

in the soil provide further treatment and disposal of the wastewater.

Paradise previously studied options to construct a wastewater collection, treatment, and disposal facility, including the environmental impact reports, feasibility studies, engineering plans, cost estimates, legal expenses, and acquisition of easements and rights-of-way. In 1992, Paradise formed the Town of Paradise Onsite Wastewater Management Zone. The purpose of the formation of the zone was to identify, permit, inspect, monitor, and regulate repairs and new construction of on-site wastewater systems which are required for new development. This was accomplished for the protection of public health and the environment. The zone currently permits and regulates over 11,000 various wastewater systems. The system varies in complexity from standard septic tanks and absorption fields to small biological wastewater treatment systems.

A typical on-site septic system can only accommodate densities at up to 10 units per acre and even this is a high intensity requiring ideal soil and site conditions. In order to facilitate the development of higher-density residential uses, the Town has also taken steps to provide alternatives to on-site wastewater treatment and to encourage high-density residential developments using alternative wastewater treatment systems. The Town is researching the development of the Town sewer collection system to accommodate redevelopment in the Downtown Revitalization Master Plan area and commercial corridors along Skyway, Clark Rd, and Pearson Rd.

The Downtown Revitalization Master Plan area includes sites designated M-F, C-S, C-B, N-C, and C-C. The M-F and C-S designations allow up to 15 units per acre when served by a clustered wastewater treatment system. The C-B designation allows 15 dwelling units per acre and the N-C and C-C designations allow 10 dwelling units per acre. The Town continues to research alternative methods of on-site septic and off-site treatment to accommodate increased densities. Before being destroyed in the Camp Fire, the Paradise Community Village project was able to develop with a

density of 14 dwelling units per acre with an on-site, clustered wastewater treatment system. Paradise Community Village was the first development to utilize the clustered systems.

Further, the Town amended the Municipal Code to allow privately owned wastewater treatment facilities to be placed and maintained off-site, which will aid in the development of small lots that would normally not be able to accommodate wastewater disposal on their own property as well as facilitate projects developing at near maximum densities.

In 2020, the Town contracted with HDR, an engineering consulting firm, to prepare an updated assessment of sewer project options. The assessment compared two alternatives for local wastewater treatment and discharge with a regional alternative involving piping wastewater to the Chico Water Pollution Control Plant (WPCP). The regional alternative was recommended because it had the lowest cost, community impacts, probable environmental impacts as well as the simplest operations and most support from the Central Valley Regional Water Quality Control Board. The area served would include the corridors along Clark Road, Skyway, and Pearson Road. The Town is moving forward with preparation of a full Environmental Impact Report (EIR) to provide further information on sewer project alternatives, projected to be completed in 2022. Design and permitting is projected for 2023-2024 and construction in 2024-2026.

### Summary

The wastewater infrastructure in the Town of Paradise and throughout the unincorporated areas immediately adjacent to Paradise has relied mostly on septic and leach field systems in past years. 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 sanitary collection and treatment system. The Town allows a clustered wastewater treatment system that combines several discharges, treats the waste in one biological treatment plant to a high-quality level, and discharges

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to subsurface land disposal. The clustered system is an 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 of 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. Furthermore, the Town is continuing to pursue of the Town of Paradise Sewer Project. This system, when completed, will allow for wastewater collection, transport, and treatment from properties identified in the proposed sewer service area, which is encompassed by Clark Road, Skyway, and Pearson Road. Chapter 6 includes implementation measures related to the creation of a Sewer Service Overlay Zone to accommodate greater densities in the SSA.

#### TRAFFIC AND ROADS

Regional access to the Town of Paradise is provided via the Skyway and State Route (SR) 191, known as Clark Road within the Town limits. The Skyway connects from SR 99 just south of Chico to Paradise in a southeasterly direction. SR 191 connects from SR 70 just north of Oroville to Paradise in a northerly direction.

The street classification system in Paradise consists of arterials, collectors, and local streets. The system consists of three major north–south streets (Skyway, Clark Road, and Pentz Road) and four east–west arterial streets (Wagstaff Road, Bille Road, Elliott Road, and Pearson Road). Other arterial streets include Sawmill Road, Nunneley Road, Roe Road and Libby Road. A network of collector and local streets feeds into these arterials.

According to the Los Angeles Times,<sup>2</sup> there are also nearly 100 miles of private roads in Paradise that dead-end on narrow overlooks with few connector streets. These dead-end roads are a constraint to providing safe housing given the challenges to evacuate from these

neighborhoods. The Town of Paradise is currently preparing a Transportation Master Plan that will include recommended gap closures to strengthen future traffic evacuation demands. The Transportation Master Plan is anticipated to be completed in 2022. The Safety Element of the General Plan is also undergoing an update to try to mitigate hazards related to wildfire and evacuation bottlenecks.

#### NON-GOVERNMENTAL CONSTRAINTS

Non-governmental constraints are those that are generated by the economic and social environment which are beyond the control of local governments. Some of the impacts of non-governmental constraints can be offset to a minimal extent by local governmental actions, but usually the effects are localized and have little influence on the housing need in the jurisdiction or market area. Non-governmental constraints to affordable housing are traditionally considered to consist of three major factors: land costs, cost of construction, and availability of financing.

#### FIRE RELATED CONSTRAINTS

The 2018 Camp Fire has created significant other constraints to the production of housing. As noted in *The Impacts of Camp Fire Disaster on Housing Market Conditions and Housing Opportunities in the Tri-County Region*, in the immediate aftermath of the disaster major rebuilding challenges faced by communities in the burn scar have included:

- Hazardous waste removal from all impacted properties.
- Debris removal from all impacted properties.
- Benzene contamination in the Paradise Irrigation District water system requiring the clearing and replacement of lines to homes and businesses to provide safe water.

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<sup>2</sup> Los Angeles Times, 2018. *Here's how Paradise ignored warnings and became a death trap*. Available at:

<https://www.latimes.com/local/california/la-me-camp-fire-deathtrap-20181230-story.html>, December 30.

- Certification of all waterline replacements prior to rebuilding.
- Massive tree mitigation to remove more than a half million hazardous trees in the public right-of-way as well as those on private properties capable of falling in the public right-of-way.
- Additional tree mitigation to remove hazardous trees on private properties capable of landing on adjacent private properties and structures.
- Assessing damage to community infrastructure, including hundreds of miles of private roads further damaged during the debris removal process.
- Assessing the devastating impacts of lost residents and businesses on the long-term fiscal health and stability of the affected communities.
- Securing the necessary financial resources needed to fund the long-term recovery and rebuilding effort.
- Lack of affordable housing units (including single-family, multi-family, and manufactured homes) due to those lost and infeasible to replace at former monthly housing costs.
- Limited number of undamaged homes available for sale or lease in the burn scar areas and often out-of-reach for former residents looking to return to their communities without rebuilding.
- The long time period required to receive Federal and State funding needed to replace affordable housing units, which is too long for current residents in limbo and contributes to unhealthy and unsafe living conditions for survivors.
- Rapidly rising costs of new construction, especially for affordable housing projects, which requires a greater level of funding from various resources than that typically received. The delays in Federal and State funding do not keep pace with continually rising costs.

Going forward, housing challenges faced by communities in the burn scar have included:

- Finding temporary housing for displaced residents to allow them an opportunity to stay within the region.
- Qualifying victims for financial support to help them find and secure housing.
- Rise in homelessness due to fire survivors having inadequate resources and aid.
- Major gap funding needed for underinsured homeowners to rebuild.
- The costs of rebuilding a home outpacing the level of insurance settlements.
- Large increases in insurance premiums and cancellations of existing homeowner policies.
- The extended timeline needed to rebuild creates uncertainty of returning residents.
- Large number of residents in precarious housing situations potentially leads to increased homelessness.

The *Camp Fire Regional Economic Impact Analysis* (January 2021) noted several of the factors cited above that are likely to hinder rebuilding and provided additional data, including:

- Widespread underinsurance among households damaged or destroyed by the fire. They study cited a survey reporting that 60% of the survey respondents do not have enough insurance to cover the cost of repairing, replacing, or rebuilding their home. The median amount of underinsurance was \$100,000.
- Difficulty obtaining insurance payment and long waiting period for disbursement of PG&E settlement funds (Fire Victims Trust). Several insurance companies were withholding payment of policy benefits until the policyholders completely rebuild their homes, but the policy holders are unable to rebuild without the proceeds from the Fire Victims Trust.
- High cost of rebuilding. Due to a general shortage of building contractors and an increased cost of building materials, cost to rebuild are much higher than the value of the original home.



### 3. CONSTRAINTS

- Difficulty obtaining or renewing insurance. Insurance rates have increased beyond the reach of many homeowners. If residents cannot obtain insurance on the voluntary market, they can obtain coverage under California's FAIR Plan, although these rates are higher. On November 5, 2020 the California Department of Insurance extended the one-year moratorium on insurance companies non-renewing or canceling residential property insurance policies in wildfire disaster areas. It is uncertain whether this current moratorium will be extended.
- The amenities provided by the land have temporarily changed/dropped in land values. While the value of surviving homes has gone up slightly due to high demand and low supply, the land value has dropped 75 percent. While this may be a positive effect for new buyers to rebuild individual homes, it provides reduced property revenues to the Town, County, schools, and special districts.
- Fire risk may negatively impact the value of homes in fire-prone areas. If public perception of the riskiness of living on the Ridge leads to a decrease in property values in this area, it would further exacerbate the tax revenue issues and could dampen efforts to rebuild.

#### MORTGAGE LENDING

Following the boom in the mortgage lending markets from 2000 through 2006, a financial crisis began in 2007. Its proximate cause was the end of the U.S. housing boom, which revealed serious deficiencies in securitized mortgage products that were offered leading up to 2006, particularly subprime mortgages with adjustable interest rates.

Mortgage markets, which were deeply affected by this financial crisis, have largely recovered since 2010. Following a period of particularly heightened caution in lending, interest rates have recovered with 2020 having the lowest average mortgage interest rates of the century. 2021 is on track to produce an even lower average interest rate than 2020.

For persons with lower credit scores and lower incomes, higher interest rates remain in place, but these higher interest rates are now at levels previously seen as the national average. Despite this, mortgage lending remains highest for buyers with high income and high credit scores, in part due to the drastic increase in home prices and shortage of for-sale homes seen in the last few years.

Town staff have also seen the impacts of the COVID-19 pandemic on the housing landscape in that borrowers were filing for mortgage forbearance, sometimes before the loans were sold, and that lessened the cash on hand the banks had to loan.

#### FINANCING COSTS AND AVAILABILITY

One of the most significant factors related to the provision of adequate housing for all segments of the population is the availability of financing. The average annual mortgage interest rates for the years 2005 through the first half of 2021 can be found in Table 3-10.

**TABLE 3-10: AVERAGE ANNUAL MORTGAGE INTEREST RATES 2005–2020 (Q1)**

2006	6.41
2007	6.34
2008	6.03
2009	5.04
2010	4.69
2011	4.45
2012	3.66
2013	3.98
2014	4.17
2015	3.85
2016	3.65
2017	3.99
2018	4.54
2019	3.94
2020	3.11
2021	2.84

Source: Freddie Mac, Monthly Average Commitment Rate and Points on 30-Year Fixed Rate Mortgages.

In 2006 as home prices peaked, interest rates climbed by 0.5 percent to 6.4 percent and held over 6 percent for the next two years. Beginning in 2008, interest rates had already dropped significantly and have continued to drop. As of December 2013, the annual average had reached 3.98 percent. After 2013, interest rates fluctuated, and eventually rose to 4.54 by 2018. Since then, they have fallen significantly to some of the lowest rates in the last 15 years.

Generally speaking, households can afford to spend 30 percent of their monthly income on housing. This figure assumes that the household does not have an already high debt-to-income ratio or other high monthly expenses. A household of four earning the 2021 median annual income of approximately \$70,700 in Butte County could theoretically afford a monthly housing payment of \$1,768. With a 5 percent down payment and including utilities, taxes, and insurance, a median income household could purchase a home valued at approximately \$225,000 at a 3.8 percent interest rate. As interest rates increase, affordability is significantly eroded.

Assistance is available through a Town-sponsored Down Payment Assistance program to eligible and qualified buyers.

### LAND COSTS

According to the California Building Industry Association, the cost of land represents an ever-increasing proportion of the total housing development cost. Since the mid-1960s, raw land costs are significantly more in California than in the rest of the United States. However, as noted above, land values have decreased by approximately 75 percent as a result of the Camp Fire.

Measures to reduce land costs, which are traditionally available to local governments, include the use of Community Development Block Grant (CDBG) funds and the use of government-owned surplus lands for housing projects. These measures generally benefit the construction of assisted, low-income housing. The Town of Paradise utilizes CDBG funding. Most of the

funding to date has been utilized for commercial revitalization programs in the project area established under the Redevelopment Agency (now defunct).

### COST OF CONSTRUCTION

Construction costs can vary widely depending on the type of development. Multiple-family residential housing generally costs less per unit to construct than single-family housing.

Labor and materials costs also have a direct impact on housing costs and are the main component of housing costs. Residential construction costs vary greatly depending on the quality of materials used and the size of the home being constructed. Construction costs include both hard costs, such as labor and materials, and soft costs, such as architectural and engineering services, development fees, and insurance. Rising costs of labor and materials have contributed to non-governmental constraints on housing development and improvements.

As reported in the Camp Fire Regional Economic Impact Analysis (January 2021), construction costs were reported to be \$250 to \$300 per square foot. Table 3-11 breaks down the estimated construction costs for multi-family construction in Paradise.

**TABLE 3-11: CONSTRUCTION COSTS**

Item Name	Metric	Estimate
Site Improvements	Per land SF	\$15
Residential Construction Cost (Type V Wood Frame)	Per GSF	\$225
Town Fees	Per GSF1	\$8.72

Source: Strategic Economics, 2021.

### ENVIRONMENTAL ISSUES

The geographical nature of the Paradise ridge is characterized as having steeper sloped canyons east and west of the town and smaller canyons to the south, limiting residential densities and entirely precluding development in some areas. These areas are generally designated for low-intensity uses, as they are not suitable for intense uses such as higher-density

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residential developments. Grading requirements and engineering techniques to develop on steeper slopes increase the cost of housing.

Soil suitability for septic systems affects the minimum parcel size as well as septic system installation and monitoring requirements, all of which affect the cost of housing.

Although there are no areas within the Town of Paradise that are designated by FEMA as within a Special Flood Hazard Area (100-year or 500-year flood), the area is traversed by several small streams and subject to localized flooding. Localized stormwater flooding is common in the FEMA floodplains, but areas outside of the floodplain can experience flooding as well, which can lead to extreme erosion and loss of property. Planning for this can lead to increased development costs through additional development of impermeable surfaces and drainage.

The majority of the town of Paradise lies within a Very High Fire Hazard Severity zone. The Butte County Local Hazard Mitigation plan, Zoning Ordinance, and the General Plan implement techniques to reduce such hazards. Additional measures are considered in this Housing Element and the concurrent Safety Element. The high fire severity zone does serve as a constraint to housing through additional development standards and the need for alternative building materials.

### AT-RISK ASSESSMENT

Properties are at risk when they are within 5 years of the end date of the most valuable subsidy or rent restriction. Each property is assigned a level of risk of conversion. There are three levels of risk: at risk, lower risk, and low risk. Properties are at lower risk of conversion when their most valuable subsidy or rent restriction is scheduled to terminate within 6 to 10 years of the current date. Properties are low risk when their subsidies and/or rent restrictions will expire more than 10 years in the future. If a property is owned by a nonprofit organization, the database assumes that the risk of conversion to market rate is one level lower than it otherwise would be.

Three projects were identified as at-risk in the 2014-2022 Housing Element and all three were destroyed in the Camp Fire. The Paradise Community Village used insurance and FEMA assistance to rebuild and thus retained the original funding and affordability expiration date. Paradise Gardens III is currently pursuing rebuilding and in the planning phase. The project got their tax credits approved and their building plans mastered in April 2021 and therefore are no longer considered at risk. The Cypress Acres Convalescent facility is not the subject of a current rebuilding proposal.

In addition to the federally funded projects mentioned above, the Town currently has a recorded covenant with the owner of 4758 Skyway (APN 051-230-041) for three units that are affordable for a 30-year period. The affordability covenant will not expire until 2045 (i.e., 23 more years from the date of writing) and therefore the three units are not considered at risk.

According to the California Housing Partnership's Preservation Database and Town staff, there are no at-risk projects (see Table 3-12).

### TERMINATION NOTICE REQUIREMENTS

State law (Government Code Section 65863.10) requires notice by owners who want to terminate their rental restrictions (Section 8 and federally assisted mortgages), whose restrictions expire (tax credit projects), or who want to sell an assisted property. The law applies to projects with low-income rental restrictions, including (1) all types of project-based Section 8 developments; (2) projects with mortgages financed through the Section 221(d)(3) BMIR, Section 236, Section 202 programs or Section 515; and (3) projects that have received an allocation of tax credits under Section 42.



TABLE 3-12: FEDERALLY ASSISTED MULTI-FAMILY HOUSING

Name	Address	Pre-Fire Units	Pre-Fire Affordability Exp. Date	Rebuild Status	Anticipated Future Units	Affordability Expiration Date
Paradise Gardens III	1040 Buschmann Road	48	12/21/2015	Exploring funding options	48	TBD
Cypress Acres Convalescent Hospital	1633 Cypress Lane	50	3/1/2031	Unknown	0	N/A
Paradise Community Village	1001 Village Parkway	36	2041	Completed	36	2041

Source: HUD; USDA; California Housing Partnership Corporation (pre-fire conditions); Kate Anderson, personal communication, August 18, 2021.

AB 1521 adopted in 2017 changed Section 65863.10 to increase the notices required from two to three: one at three years prior to termination or expiration of the restrictions, one at 12 months prior, and a third notice at six months. The purpose of these notices is to inform tenants, local governments, local housing authorities, and the California Department of Housing and Community Development (HCD) of the owner's intention to terminate restrictions.

California law also contains an "option to make an offer to purchase" (Government Code Section 65863.11). The purpose of this provision is to provide buyers willing to preserve an assisted project with an opportunity to try to purchase the development from the seller. An owner who chooses to terminate rental restrictions or whose restrictions are expiring is required to provide a notice to potential qualified buyers. An owner with an assisted project also must provide notice if selling the project would result in discontinuance of the use restrictions.

A notice must be sent to all qualified entities who register with HCD on its website or who contact the owner directly. This notice must be sent three years prior and 12 months prior to sale or termination by registered or certified mail, as well as posted in the project.

## ACTIVE TERMINATION NOTICES

At the time of this writing, no notices have been filed with HCD by private owners of assisted multi-family housing units indicating they are considering termination of rental restrictions or conversion of restricted units to market-rate units.

## OPPORTUNITIES FOR ENERGY CONSERVATION

Energy-related costs could directly impact the affordability of housing in Paradise. Title 24 of the California Administrative Code sets forth mandatory energy standards for new development and requires the adoption of an "energy budget." Subsequently, the housing industry must meet these standards and the Town is responsible for enforcing the energy conservation regulations. Alternatives that are available to the housing industry to meet the energy standards include:

- A passive solar approach that requires suitable solar orientation, appropriate levels of thermal mass, south-facing windows, and moderate insulation levels.
- Higher levels of insulation than what was previously required, but not requiring thermal mass or window-orientation requirements.
- Active solar water heating in exchange for less stringent insulation and/or glazing requirements.

The utility company serving Paradise, Pacific Gas and Electric Company (PG&E), offers various programs to promote the efficient use of energy and assist lower-income customers.

PG&E provides electricity and natural gas to consumers in Paradise as well as a variety of energy conservation services for residents. In addition, PG&E offers energy assistance programs for special needs and lower-income households to help households conserve energy and control utility costs. These programs include the

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California Alternate Rates for Energy (CARE), the Relief for Energy Assistance through Community Help (REACH), Family Electric Rate Assistance (FERA), and the Energy Partners Program.

The CARE program provides a 20 percent monthly discount on natural gas and electric rates to households with qualified incomes, certain nonprofit organizations, homeless shelters, hospices, and other qualified nonprofit group living facilities. CARE offers assistance to single-family households, sub-metered tenants, and agricultural employee and migrant farmworker housing.

The REACH program provides one-time energy assistance to customers who have no other way to pay their energy bill. The intent of REACH is to assist low-income households, particularly the elderly, disabled, sick, working poor, and the unemployed, that experience hardships and are unable to pay for their necessary energy needs. Individuals who experience an uncontrollable or unforeseen hardship can receive credits to pay their energy bills.

The FERA program provides utility assistance to households with three or more members that are low or middle income. This program allows these households to be billed at Tier 2 rates for Tier 3 power usage.

The Energy Partners Program provides free weatherization measures and energy-efficient appliances to low-income households.

In addition, the California Department of Community Services and Development funds the Home Energy Assistance Program (HEAP). HEAP provides financial assistance to eligible low-income persons to offset the costs of heating and/or cooling their housing unit.

Additionally, the Town of Paradise offers a reduced flat fee (\$131.40), fast-tracked, plan review process for residential solar projects.



## CHAPTER 4 | RESOURCES

This chapter discusses resources available for the accommodation and development of the Town's housing needs, including resources to assist those who are rebuilding. The discussion includes: an evaluation of the adequacy of the town's land inventory to accommodate the town's share of regional housing needs for the 2022-2030 planning period; a review of financial resources to support housing activities; a discussion of the administrative resources available to assist in implementing the housing programs contained in this Housing Element; and a description of the requirements and resources Paradise has to encourage energy conservation.

### HOUSING SITES INVENTORY

#### REGIONAL HOUSING NEEDS ALLOCATION

A Regional Housing Needs Plan (RHNP) is mandated by the State of California (Government Code Section 65584) for regions to address housing issues and needs based on future growth projections for the area. The RHNP is developed by the Butte County Association of Governments (BCAG) and allocates a "fair share" of regional housing needs to the Cities of Biggs, Chico, Gridley, and Oroville, the Town of Paradise, and unincorporated Butte County. The RHNP not only addresses the immediate needs of each jurisdiction; it also ensures that needs for the entire region are fairly distributed to all communities. A major goal of the RHNP is to ensure that every community provides an opportunity for a mix of affordable housing to all economic segments of its population.

The State Department of Housing and Community Development (HCD) projected a need for 15,506 units in Butte County between December 31, 2021, to June 15, 2030. Over half of these units – 8,803 units or 57 percent of the total allocation – are to rebuild those lost in the 2018 Camp Fire and the remaining 43 percent (6,703 units) are to accommodate regular growth. Units developed after December 31, 2021, will count towards the sixth cycle Regional Housing Needs Allocation (RHNA).

The RHNP determined the Town's "fair share" of the region's projected housing need through June 15, 2030, based on factors like transit connectivity, jobs, wildfire risk, agriculture and forest land preserves, and opportunity.<sup>1</sup> The fire rebuild allocation was assigned separately

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<sup>1</sup> Opportunity was measured through a combination of HCD/TCAC opportunity maps and childhood poverty status.

## 4. RESOURCES

based on each community's proportionate loss of units in the Camp Fire.

The Town of Paradise's total share of the RHNA is 7,179 units, which is approximately 46 percent of the overall regional housing need. A small fraction of the allocated 7,179 units – 376 units or 5 percent – is to accommodate regional growth. Instead, the vast majority of Paradise's allocation – 6,837 units or 95 percent – is the fire rebuild allocation. The Town must demonstrate availability of residential sites at appropriate densities and development standards to accommodate these 7,179 units according to the following income distribution:

- Very Low-income: 383 (5 percent)
- Low-income: 374 units (5 percent)
- Moderate Income: 1,319 (18 percent)
- Above Moderate Income: 5,103 units (71 percent)

The Town identified adequate sites in its 2014–2022 Housing Element. There is no unaccommodated need from the previous cycle that needs to be addressed in this Housing Element.

Table 4-1 identifies the Town's allocation for the current 2022–2030 cycle and how it will meet its RHNA through projected development of accessory dwelling units (ADUs) and anticipated development of single- and multi-family housing on vacant land throughout the town.

### AVAILABLE HOUSING SITES

Over 5,000 acres of land were identified that are both suitable for residential development and constitute realistic sites for residential development. Available sites could yield approximately 9,610 housing units (see Table 4-1). There is adequate capacity on appropriately zoned and designated sites to accommodate Paradise's 2022–2030 RHNA. Figure 4-1 shows the sites identified for residential development. All identified sites are zoned for exclusively residential development.

**TABLE 4-1: SUMMARY OF RESIDENTIAL SITES INVENTORY (2022-2030)**

	Very Low	Low	Mod.	Above Mod.	Totals
2022–2030 Allocation	383	374	1,319	5,103	7,179
ADUs	0	16	16	8	40
Single Family Homes and Manufactured Housing	274	995	827	4,122	6,217
Sewer Service Area Sites		175	907	2,147	3,229
Multi-family Sites Outside the Sewer Service Area	0		0	124	124
<b>Total</b>	<b>1,459</b>		<b>1,750</b>	<b>6,401</b>	<b>9,610</b>
Surplus	702		431	1,298	2,431
Buffer Percentage	93%		33%	25%	34%

Note: The units identified in this table are inclusive of 898 single-family and manufactured homes and 154 multi-family units that are currently in the pipeline. These units have received building permits and will be completed during the planning period. Assumes 50 percent of the very low-income households are extremely low-income households.

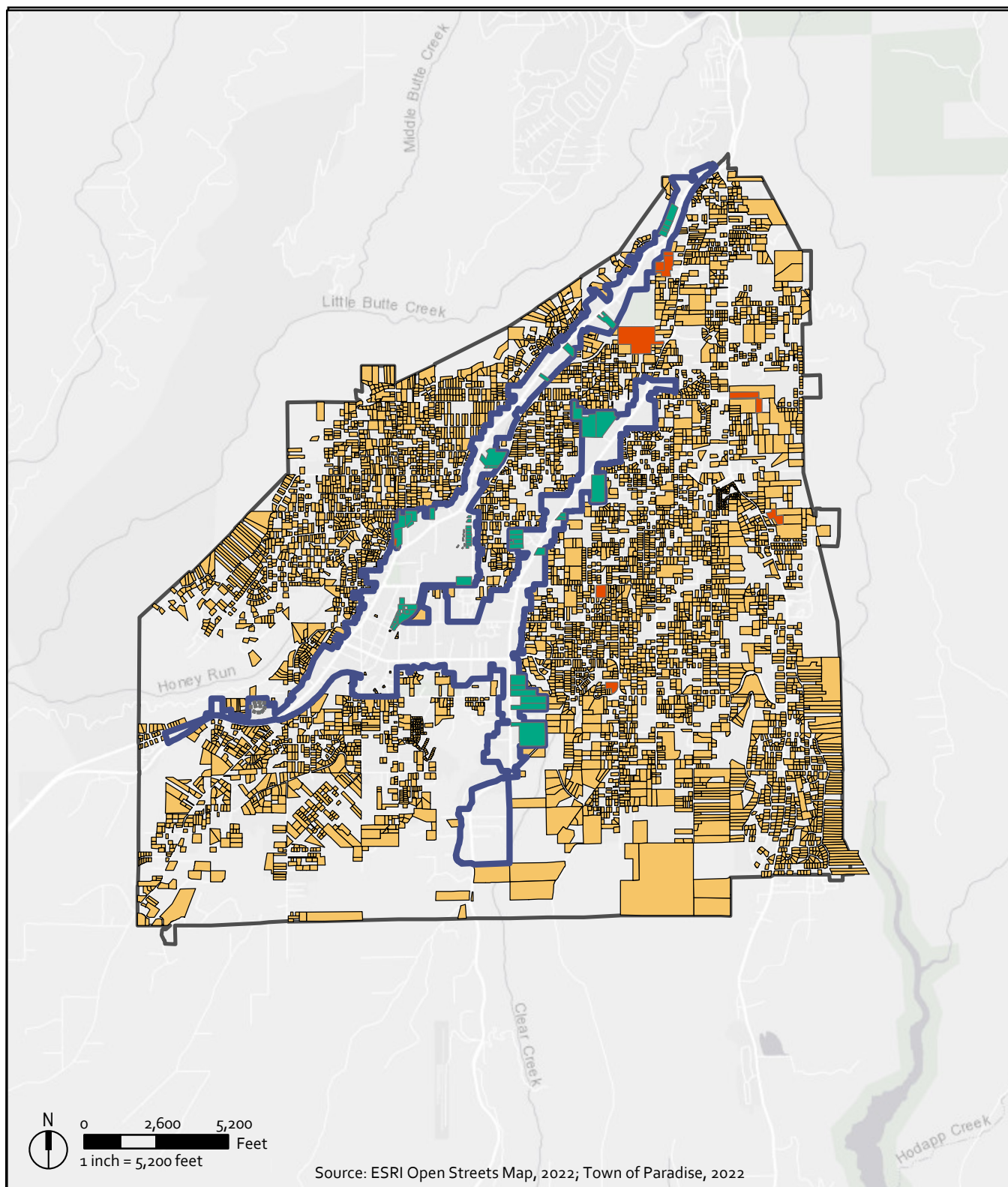
The units associated with single-family homes and manufactured housing are inclusive of seven parcels assumed to develop with duplexes.

Source: BCAG 2020; Town of Paradise, 2021.

Sites considered appropriate for residential development include those that are both 1) vacant – either from Camp Fire destruction or those that were previously vacant, and 2) designated or proposed to be designated in the General Plan for residential use and zoned to allow residential development. There are three primary types of sites, as described below:

- **Single-Family Homes Rebuilds and New Construction.** This category includes sites previously developed with single-family homes that were destroyed in the Camp Fire and sites that were previously vacant that are identified for exclusively low-density residential uses, such as sites zoned Agricultural Residential (AR-1, AR-3, AR-5), Rural Residential (RR-1, R-1/2, R-2/3), and Town Residential (TR-1/3, TR-1/2, TR-1). There are over 6,200 sites that were previously developed with single-family homes that were destroyed in the fire. It is assumed that residential uses will return to most of these sites. A portion of these single-family homes will be manufactured housing, which can accommodate lower income households.










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

Figure 4-1  
Adequate Residential Sites

## 4. RESOURCES

- Sewer Service Area Sites.** Sites within the planned sewer service area have been selectively identified for increased densities. Many of the Town's zoning districts fall within the sewer service area, but a Sewer Service Overlay allowing increased densities would apply on the Multiple-Family Residential (M-F), Central Business (C-B), Community Commercial (C-C), Community Services (C-S), and Community Facilities (C-F) zoning districts. Although residential uses are allowed in all these zones, the sites inventory considers only the capacity associated with sites in the M-F zone, as explained under Assumptions, below. A combination of rezoning and increased densities on these sites are anticipated to accommodate a range of affordability levels and will provide developers with flexibility in determining a range of uses, densities, and unit types.
- Multi-Family Development Outside the Sewer Service Area.** There are sites zoned for exclusively residential use in the M-F district and for mixed-use residential development that were destroyed in the fire or were previously vacant. These sites are anticipated to develop and/or rebuild but at lower densities than in the sewer area and therefore they are not anticipated to accommodate lower-income units.

Appendix D includes an inventory of each site by assessor's parcel number, acreage, General Plan land use designation, zoning, realistic unit yield, affordability by income group, and notes regarding the status of each site in terms of vacancy and proposed development. Pursuant to Government Code Section 65583.2(b)(6), sites identified as available for housing for above moderate-income households in areas not served by public sewer systems need not be identified on a site-specific basis. Therefore, Appendix D includes only the sites in the sewer service area. An analysis of the adequacy of the Town's sites to accommodate extremely low-, very low-, low-, moderate-, and above-moderate-income units is provided below. This information is summarized in Table 4-2. (See Table 4-1 for yields from ADUs and single-family and manufactured housing.)

**TABLE 4-2: SUMMARY OF AVAILABLE HOUSING SITES BY ZONING, ACREAGE, AND UNIT YIELD**

Zoning District	Number of Parcels	Acreage	Realistic Unit Yield
Above Moderate-Income Units			
Within Sewer Service Area (SSA)			
MF	143	159.35	2,143
TR 1/2	1	1	2
TR 1/3	1	2.29	2
<i>SSA Subtotal</i>	<i>145</i>	<i>162.64</i>	<i>2,147</i>
Outside SSA			
MF	5	12.81	114
TR 1/2	1	3.79	2
TR 1/3	4	37.57	8
<i>Outside SSA Subtotal</i>	<i>10</i>	<i>54.17</i>	<i>124</i>
<b>Above Moderate Subtotal</b>	<b>155</b>	<b>216.81</b>	<b>2,271</b>
Moderate-Income Units			
MF	81	101.11	907
<b>Moderate Subtotal</b>	<b>81</b>	<b>101.11</b>	<b>907</b>
Lower-Income Units			
MF	36	100.08	175
<b>Lower Subtotal</b>	<b>36</b>	<b>100.08</b>	<b>175</b>
<b>Total</b>	<b>155</b>	<b>216.81</b>	<b>3,353</b>

Note: Calculations assume rezoning the site of a former church with no plans to rebuild (see Table 4-7). Acreage and parcel subtotals do not equal the grand total since parcels are assumed to develop with a mix of affordability levels.  
Source: Town of Paradise, 2021.

### MINIMUM DENSITIES FOR EXTREMELY LOW-, VERY LOW-, AND LOW-INCOME

Government Code Section 65583.2(c)(3) requires a jurisdiction to either (1) provide an analysis demonstrating how adopted densities accommodate the need for lower-income households or (2) use default densities deemed appropriate for metropolitan, suburban, and rural areas. Paradise is considered a suburban area, and the default density for lower-income housing needs is 20 dwelling units per acre (du/ac) for suburban areas. Historically, residential projects in Paradise have not been able to develop at densities of 20 du/ac because the lack of municipal wastewater system requires most residences to be on

individual septic systems or to construct clustered or packaged wastewater treatment plants. However, it is anticipated that a sewer system will be constructed during the 2022-2030 cycle, and that densities of 20 du/ac and above could be achieved once the sewer system is established. Therefore, this site inventory utilizes the default density of 20 du/ac as a threshold for when lower-income units are feasible. A sewer overlay zone is proposed in the sewer service area that allows up to 30 du/ac. The Sewer Service Overlay is described more later in this chapter (see *Paradise Sewer Project*).

Outside of the sewer area, multi-family or mixed-use residential development is allowed up to 15 du/ac. It is assumed that these units would hit the above-moderate income RHNA since the default density is not met. See Sewer Alternative above for more information on how the Town can accommodate its RHNA should the sewer system not come to fruition before 2030.

#### EXTREMELY LOW-, VERY LOW-, AND LOW-INCOME SINGLE-FAMILY UNITS

The projected affordability of units built on parcels zoned for single family homes is based on recent trends, as documented in the 2020 Annual Progress Report. Of the 587 building permits issued in 2020 for manufactured homes or single family detached homes, 4.4 percent were for very low-income; 16.0 percent were for low-income; 13 percent were for moderate income; and 66 percent were for above moderate income. The Town used the contract amount for the manufactured homes and the International Code Council (ICC) valuation for the single-family detached homes to determine affordability. See Table 4-3 for this data. Also see the section below on Manufactured Housing for more information about how affordability was assessed.

**TABLE 4-3: SINGLE-FAMILY AND MANUFACTURED HOUSING AFFORDABILITY**

		MH	SFD	Total	%
Very Low	Deed Restricted	0	0	0	0%
	Non-Deed Restricted	25	1	26	4.4%
Low	Deed Restricted	0	0	0	0%
	Non-Deed Restricted	92	2	94	16.0%
Moderate	Deed Restricted	0	0	0	0%
	Non-Deed Restricted	57	21	78	13.3%
Above Moderate		11	378	389	66.3%
Total		185	402	587	100.0%

Source: Town of Paradise, 2020.

## REALISTIC UNIT YIELD

### ASSUMPTIONS

A number of assumptions, varying by zoning district and unit type, were made to determine the realistic unit yield anticipated for individual parcels. These assumptions were based on discussions with developers and Town staff as well as a review of permitting data.

The Town has seen significant development activity in the wake of the Camp Fire, including 47 multi-family projects of two units or more. As shown in Table 4-4, the yield on the projects ranges from 8 percent to 200 percent. This wide range is likely due to rebuilding like for like on sites where greater intensity is allowed under zoning or projects that were legally non-conforming where such intensity is not allowed under current zoning.

As shown in Table 4-4, recent multi-family development has occurred on sites ranging from 0.19 acres to 4.72 acres with an average site acreage of 1.45. The range of acreages indicates that development is feasible on smaller sites.

The average yield across all residential development is 66 percent. Consistent with these development trends, a yield of 60 percent was conservatively utilized to calculate realistic capacity.

## 4. RESOURCES

**TABLE 4-4 RECENT MULTI-FAMILY PROJECTS**

APN	Site Size (Acre)	Zoning District	Allowed Density (Units)	Unit Count	Yield
054-090-075-000	3.3	MF	50	56	113%
053-120-062-000	0.48	MF	7	4	56%
053-132-080-000	2.18	MF	33	4	12%
053-132-079-000	3.27	MF	49	4	8%
052-211-045-000	0.43	CC	4	4	93%
053-132-080-000	2.18	MF	33	16	49%
053-132-079-000	3.27	MF	49	12	24%
052-212-023-000	0.33	TR 1/3	3	3	100%
054-380-001-000	2.11	CS	32	36	114%
054-182-079-000	1.01	MF	15	2	13%
054-171-132-000	1.05	MF	16	2	13%
051-220-065-000	1.94	MF	29	24	82%
052-213-011-000	0.68	TR 1/3	3	4	133%
052-250-002-000	0.47	TR 1/3	3	4	133%
054-182-071-000	1.0	MF	15	2	13%
054-090-057-000	2.45	MF	37	28	76%
051-220-069-000	1.4	MF	21	4	19%
052-233-010-000	0.19	TR 1/3	3	2	67%
052-160-018-000	3.19	MF	48	10	21%
054-182-078-000	1.18	MF	18	4	23%
054-182-077-000	1.18	MF	18	2	11%
053-120-081-000	1.87	MF	28	4	14%
051-163-005-000	0.62	CC	6	7	113%
054-182-081-000	1.01	MF	15	4	26%
053-120-076-000	3.24	MF	49	8	16%
053-131-080-000	0.28	MF	4	2	48%
053-131-081-000	0.22	MF	3	2	61%
053-131-082-000	0.22	MF	3	2	61%
053-131-083-000	1.71	MF	26	10	39%
051-132-118-000	0.36	TR 1/2	1	2	200%
053-120-080-000	4.72	MF	71	8	11%
054-141-073-000	0.53	TR 1/3	3	2	67%
053-120-071-000	2.65	MF	40	6	15%
054-131-026-000	1.35	TR 1/2	2	2	100%
053-170-146-000	0.9	TR 1/2	2	2	100%
052-080-006-000	2.22	CS	33	4	12%

APN	Site Size (Acre)	Zoning District	Allowed Density (Units)	Unit Count	Yield
053-120-080-000	4.72	MF	71	10	14%
053-120-073-000	1.23	MF	18	2	11%
052-182-050-000	0.77	TR 1/3	3	6	200%
053-120-052-000	1.62	MF	24	12	49%
053-103-025-000	0.68	CC	7	4	59%
051-164-033-000	0.24	TR 1/3	2	2	100%
053-162-008-000	0.68	TR 1/3	3	4	133%
053-120-008-000	1.25	MF	19	16	85%
054-164-026-000	0.56	TR 1	1	2	200%
053-120-039-000	0.3	TR 1/3	2	2	100%
054-152-068-000	1.01	TR 1/2	2	2	100%
<b>Average Yield</b>					<b>66%</b>

Source: Town of Paradise, 2020.

Although residential units have been developed on sites in the CC and CS zones, there is not a strong history of developing vertical mixed-use in Paradise. When looking at all development that has occurred in commercial zones where residential is also allowed (e.g., C-B, C-C, C-S), only 17 percent of projects included residential units. As the sewer comes in, there will be greater opportunity to do vertical mixed-use projects given increased density and Town programs to create a more walkable downtown core. However, given the lack of historic data to substantiate development on non-residential parcels, these parcels are not included in the realistic capacity calculations.

Figure 4-2 illustrates all parcels where residential development *could* occur. The Town seeks to facilitate residential development on many of these parcels in the downtown area through the sewer service area overlay zone. If residential units are added to the C-B, C-C, C-F, and C-S zones at just half the allowed intensity, Paradise would see an additional 1,829 housing units, including 67 units affordable to very low- and low-income households. These units are not included in the sites inventory but further indicate that the Town has adequate land resources to accommodate its RHNA.



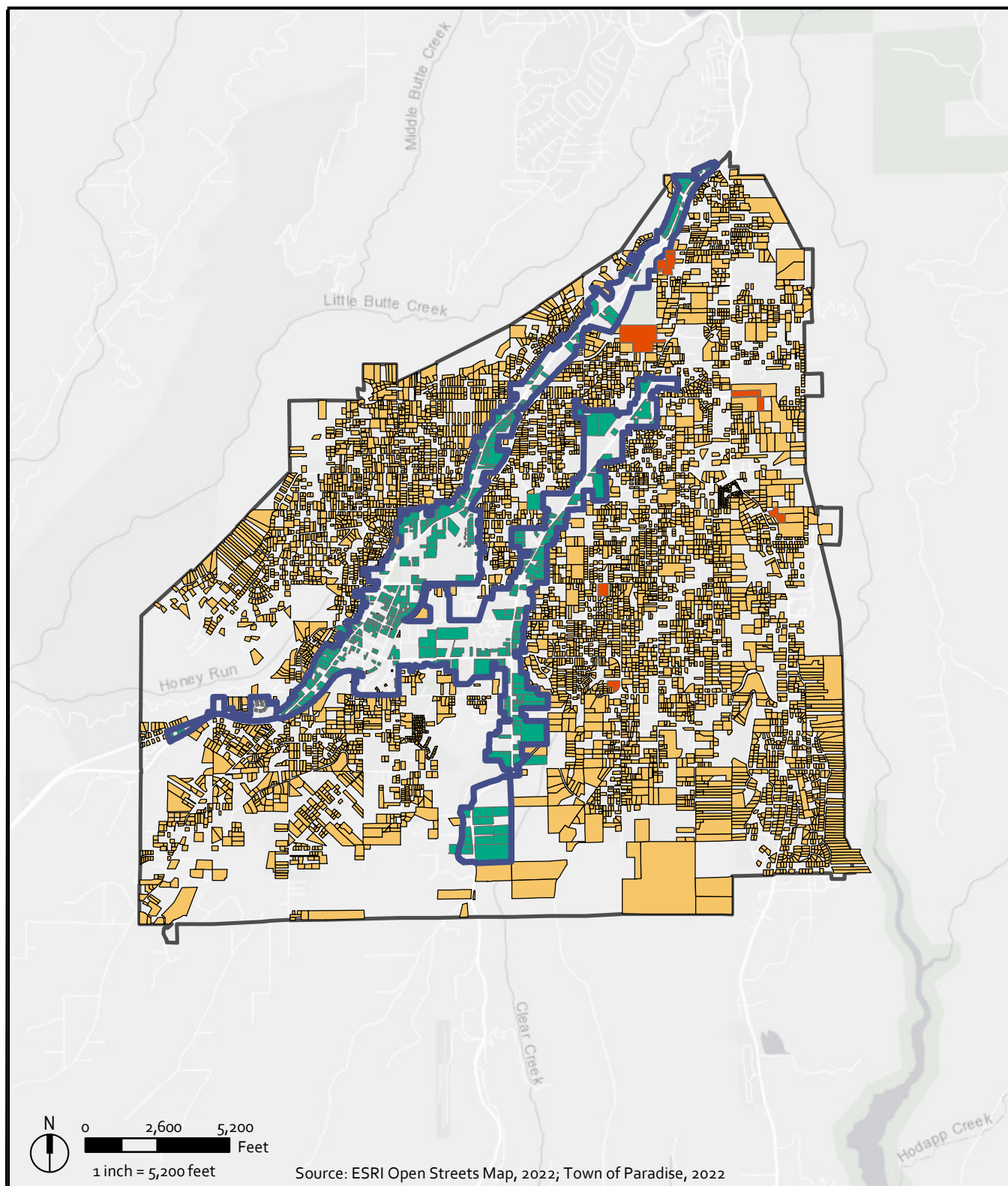


Figure 4-2  
Potential Residential Sites

## 4. RESOURCES

### ACCESSORY DWELLING UNITS (ADUs)

According to the 2020 Annual Progress Report (APR), five ADUs were issued building permits in 2020, which is up from two permits issued in 2019. Previous years did not include any ADU permits. The few ADUs built in the last planning period makes it difficult to extrapolate a trend, but the bump in ADU construction in 2020 suggests a modest trend of increasing ADU production.

Conversations with stakeholders and data collected in the local census survey indicates that ADU construction is not anticipated to substantially increase during this 2022-2030 planning period. When residents were asked if they would consider building a secondary unit for a renter if they had sufficient acreage, less than a third (27 percent) of respondents said yes. Interviews with stakeholders indicate that the current priority for homeowners is building back what they have lost, and this might explain why there is not greater interest in ADUs. However, others thought that ADUs might become more popular for aging in-place or multi-generational families after the initial rebuilding phase is complete. In addition, the Town is currently implementing a program to allow property owners to use a residential floor plan library which utilizes ADU plans that have been mastered, or “pre-approved” to facilitate the construction of ADUs. This program could lead to increased ADU production beyond the modest increases seen in the last period.

To be conservative, this site inventory assumes that ADU production will continue at the same rates historically seen in the town. The inventory assumes production of five ADUs during each year of the planning period at the same affordability rates reported in the 2020 APR (i.e., 40 percent low income, 40 percent moderate income, and 20 percent above moderate income).

### MANUFACTURED HOUSING

Trends from the 2019 and 2020 APRs were utilized to determine how many single-family homes would be developed or rebuilt as manufactured housing. Consistent with the 2019 and 2020 APR data and

consultations with Town staff, approximately 30 percent of single-family homes were assumed to be manufactured housing. The 2021 proportion of manufactured homes of the total single-family homes is lower at 17 percent. Town staff believe this is largely due to impacts on the stock of manufactured units resulting from the Almeda fire in Southern Oregon in the fall of 2020. For the first four months of 2022, the Town has received permit applications for 52 manufactured housing units, which is in line with the volumes in 2019 and 2020.

The affordability of the manufactured housing is determined using the required forms (HCD-433-A and B) that also provide valuation information to the County Assessor and indicate that the manufactured home will be a fixture improvement to the property. The form HCD-433(b) is submitted with the building permit and includes the total sales price for the basic unit, accessories, delivery, and installation. Average cost of the tie-down foundation used by approximately 90 percent of the manufactured homes is about \$2,500. The permit fees are added to the total sales price in order to determine affordability. Almost all of the manufactured homes built following the Camp Fire have been constructed with insurance payouts and therefore do not involve financing costs that would need to be factored into the determination of the affordability.

### LOW DENSITY HOUSING

Two-family residences, or duplexes, are permitted or conditional uses in the Agricultural Residential, Rural Residential, Town Residential, and Community Services zones. Parcels in these zones therefore have a maximum allowed density of two units but could be more likely to develop with a single-family home (i.e., one unit).

It was assumed that any parcel in these lower-density residential zones that was previously developed with a single-family home that was destroyed in the fire would redevelop once again with a single-family home. Additionally, parcels that are under 0.5 acres were also assumed to develop with just one unit. Finally, parcels

in the TR-1 zone and Agricultural Residential zones were assumed to develop with just one unit since a conditional use permit is required for duplexes in these zones. Given these assumptions, it is anticipated that 6,203 single-family homes would develop on approximately 4,790 acres.

Duplexes have historically made up a substantial share of the town's multi-family housing; as of September 22, 2021, 106 units in two-unit buildings had been issued building permits since the fire, which is equivalent to 31 percent of all the multi-family units that have been issued permits and 5 percent of all residential units (both single- and multi-family) that have been issued permits. Of the 3,258 acres zoned for low-density residential where duplexes are allowed by right, just 1.4 percent (44.65 acres) are conservatively assumed to develop with duplexes. Duplexes are assumed to provide 14 units on 7 parcels.<sup>2</sup>

### SMALL AND LARGE SITES

Consistent with HCD guidance, sites less than 0.5 acres were not considered suitable for affordable housing development. However, as illustrated by the recent multi-family projects shown in Table 4-4, residential development has historically occurred on parcels as small as 0.19 acres, with duplexes frequently developing on sites less than 0.3 acres and triplexes and fourplexes occurring on sites between 0.3 and 0.5 acres. The average yield of 66 percent shown in Table 4-4 was inclusive of smaller sites and therefore sites between 0.15 and 0.5 acres were included in the inventory to develop with moderate- and above-moderate income units at only 60 percent of the allowed capacity, consistent with HCD guidance. Per discussion with Town staff, sites less than 0.15 acres were assumed to not develop whatsoever.

Similarly, sites greater than 10 acres are anticipated to develop only with moderate- and above-moderate

income units. Consistent with HCD guidance, the realistic capacity of these sites was evenly split between moderate- and above-moderate income units. There are 4 parcels zoned for multi-family residential development that are greater than 10 acres. It is assumed that 474 moderate- and 474 above-moderate income units could develop on these larger sites, which total 52.81 acres.

These assumptions are conservative, especially given that CDBG-DR funding can be used for scattered site affordable housing developments.

### OTHER ASSUMPTIONS

For unit yield in the M-F zoning district that do not fall into one of the circumstances described above, it was assumed that projects would develop at 60 percent of unit yield to accommodate infrastructure, right-of-way, setbacks, habitat, avoidance of natural resources, and other common site constraints. This capacity calculation is supported by the average yield of 66 percent calculated across 47 recent development projects. It is anticipated that the sewer system will require much less land be dedicated to leach fields and other on-site wastewater provisions and therefore a 60 percent capacity calculation is a conservative estimate. Similarly, in order to not overstate development potential, the total number of units was rounded down for each parcel, so a remainder of 0.01 to 0.99 units was reduced to zero. For example, a parcel that could accommodate 4.65 units was inventoried with only 4 units.

The Town does not have a requirement that mixed-use projects include any residential units. Therefore, it is unlikely that mixed-use projects in commercial zones (e.g., C-B, C-C) will all max out at their allowed residential densities. Permit data from the Town indicates that approximately 17 percent of recent development in the C-C, C-S, and C-B zones have

<sup>2</sup> One of the parcels assumed to accommodate two units is the 25-acre site of the previous Apple Tree Village Mobile Home Park (MHP) (APN 050-150-111-000). The MHP is permitted to return regardless of its underlying zoning given HCD's purview over the park. However, given constraints

outside the Town's control and the absence of an active application, it was assumed that the approximately 160 homes previously at the park would not return during this cycle. This is a conservative estimate and does not indicate that the Town in any way discourages the return of the MHP.

## 4. RESOURCES

included residential units. The sites inventory does not include any residential buildout on these commercial zones. However, as previously mentioned, the Town intends to facilitate vertical mixed-use development on projects in the SSA that are in the C-C, C-S, C-B, and C-F zones. Residential development on these sites where a mix of uses is allowed could result in an additional 1,829 housing units, including 67 units affordable to very low- and low-income households. Chapter 6 includes a program to incentivize the inclusion of residential units in mixed-use projects, since this is currently uncommon but desired to create a more walkable downtown area.

The Town's development standards will accommodate development at the maximum density of 30 du/ac in the M-F and C-B districts within the planned Sewer Service Overlay Zone. Outside of the overlay, the M-F zone and C-B zones will retain their current densities of 15 and 10 du/ac, respectively. The Sewer Service Overlay Zone will also apply to the C-C, C-F, and C-S zones. See Table 4-5 more information on current and proposed development standards. Multi-family uses are not currently allowed in the C-F zones, which is a barrier for public-private partnership that could include affordable housing on publicly owned land. To enable this possibility, the uses in the C-F district would be amended to allow multi-family uses of up to 20 du/ac in the sewer overlay. Multi-family uses in the C-F zone are consistent with the zoning district's intention to provide "private land uses which serve a community purpose or benefit the community."

**TABLE 4-5: SEWER SERVICE OVERLAY DENSITIES**

Zoning District	Max. Allowable Density Outside Sewer Overlay	Acreage Outside Sewer Overlay <sup>1</sup>	Max. Allowable Density Inside Sewer Overlay	Acreage Inside Sewer Overlay <sup>2</sup>
Multi-family Residential (M-F)	15 du/ac	12.81	30 du/ac	170.19
Central Business (C-B)	10 du/ac	--	30 du/ac	38.85
Community Commercial (C-C)	10 du/ac	--	30 du/ac	255.08
Community Services (C-S)	15 du/ac	--	20 du/ac	56.57
Community Facilities (C-F)	1 du/ac	--	20 du/ac	17.78

Notes: Inventory does not include units that could be built in the commercial zones.

<sup>1</sup> Outside the SSA, sites in zones C-B, C-C, C-S or C-F are too small to realistically accommodate units and so acreages are not calculated.

<sup>2</sup> Assumes rezoning of 10 sites in the SSA. See Table 4-7.

Source: Town of Paradise, 2021.

## PARADISE SEWER PROJECT

Since its incorporation in 1979, the Town of Paradise has sought a wastewater treatment solution, with a focus primarily on commercial and densely-populated residential areas — the portions of Paradise most vulnerable to groundwater degradation and economic stagnation due to sewer limitations. The Town researched a clustered wastewater treatment system to serve the Downtown Revitalization Master Plan area, which generally extends from Elliot Road in the north to Pearson Road in the south and from parcels abutting the Skyway to the west to the Paradise Memorial Trail to the east and includes vacant sites zoned C-B and M-F.

In 2020, the Town contracted with HDR, an engineering consulting firm, to prepare an updated assessment of wastewater options. The assessment compared two alternatives for local wastewater treatment and discharge with a regional alternative involving piping wastewater to the Chico Water Pollution Control Plant (WPCP). The regional alternative (now called the Paradise Sewer Project) was recommended because it had the lowest cost, fewer community impacts and probable environmental impacts as well as the simplest operations and most support from the Central Valley Regional Water Quality Control Board. The Paradise Sewer Project is currently undergoing environmental review and certification of the Final Environmental Impact Report is anticipated in 2022. Construction of the sewer is anticipated to end by Fall 2026.

The Paradise Sewer Project will bring many benefits to the region, including wastewater disposal surety to help businesses and jobs return to Paradise and spur on recovery, allow for more densely populated residential development in the Town to help increase affordable housing, and improve Paradise groundwater quality by decreasing septic tank discharges. The areas of town that will be served by the sewer along Skyway and Clark Road are also areas that are easier to protect in a wildfire event given that they have a more traditional street layout compared to some of the areas in town on private, dead-end streets. The sewer service area is also flatter and away from the more treacherous canyons



and creekside areas. The Paradise Sewer Project therefore provides a win-win opportunity to cluster homes in a manner that can increase affordability and safety.

### SEWER SERVICE OVERLAY

As mentioned above, a Sewer Service Area Overlay Zone (or Sewer Service Overlay) would be established to allow higher-density development in the sewer service area. As shown in Table 4-5, the Sewer Service Overlay would apply to parcels with underlying zoning districts of M-F, C-B, C-C, C-S, and C-F. These zones allow more intense development and by allowing increased densities in these zones in the core of town, the Sewer Service Overlay can help the Town achieve its community-driven vision of a more walkable downtown as established in the Long-Term Community Recovery Plan. Chapter 6 includes policies and programs related to implementation of the Sewer Service Overlay.

### SEWER ALTERNATIVE

Although the Town and its partners are pursuing the Paradise Sewer Project in good faith and do anticipate a sewer system being constructed during the 2022-2030 Housing Element period, it is important to plan for a scenario where that does not happen. The uncertainty of obtaining financing, the political circumstances, and project/construction delays are all reasons why it is important to consider how the Town can accommodate its RHNA if the sewer system is delayed or does not come to fruition.

Without a sewer system, the biggest constraint to increased densities for multi-family projects in Paradise is the cost of providing wastewater treatment. Due to Paradise's unique situation as the only moderate-large size incorporated town in California that does not have a public sewer system, it is not appropriate to compare densities of affordable housing in other jurisdictions, such as what HCD's default density for affordable housing suggests.

The Town's current regulations allow densities of up to 15 du/ac for projects using alternative wastewater treatment methods in order to encourage the development of lower-income housing. Previously, the limit was 10 du/ac. Paradise Community Village was the first affordable project proposed with higher densities using alternative wastewater treatment. It has a built density of approximately 14 du/ac and is the only recent tax credit project in the Town (it was originally built in 2013, then destroyed in the fire and is currently being rebuilt like for like). Previous affordable projects have lower densities, ranging from 5.4 to 12.4 du/ac. Interviews with developers, including Community Housing Improvement Program (CHIP) who built Paradise Community Village, indicated that density beyond 15 du/ac is not necessarily needed to build affordable housing. The recent experience of CHIP rebuilding Paradise Community Village indicates that is feasible to provide very low- and low-income units with densities around 15 du/ac.

An alternative sites inventory was conducted that utilized a density of 15 du/ac as the threshold for affordability. In this scenario, the Town's existing density standards were applied (i.e., the densities of 10 du/ac and 15 du/ac that would apply if the SSA Overlay were not applied). Consistent with the assumptions under the sewer scenario, only sites in residential zones were included and a realistic capacity of 60 percent was used to calculate unit yield. Consistent with the sites inventory found in Appendix D, affordable units were only assumed on sites between 0.5 and 10 acres in size and development was not considered feasible on sites less than 0.15 acres. Sites that did not meet the criteria for affordable units were anticipated to develop with a 50/50 mix of moderate- and above-moderate income units.

Table 4-6 shows the unit yields in a scenario without the sewer system and corresponding SSA Overlay. Although this scenario results in fewer units, there are still enough units to accommodate the RHNA and an overall 9 percent buffer. This scenario is the one included in the HCD-required inventory spreadsheet, consistent with HCD guidance to identify the zoning for sites as zoned at the beginning of the planning period.

## 4. RESOURCES

**TABLE 4-6: SUMMARY OF RESIDENTIAL SITES INVENTORY (2022-2030) WITHOUT SEWER SYSTEM**

	Very Low	Low	Mod.	Above Mod.	Totals
2022–2030 Allocation	383	374	1,319	5,103	7,179
ADUs	0	16	16	8	40
Single Family Homes and Manufactured Housing	274	995	827	4,122	6,217
Multi-Family Development	75		476	1022	1573
<b>Total</b>	<b>1,359</b>		<b>1,319</b>	<b>5,152</b>	<b>7,830</b>
Surplus	602		0	49	651
Buffer Percentage	80%		0%	1%	9%

Note: The units identified in this table are inclusive of 898 single-family and manufactured homes and 154 multi-family units that are currently in the pipeline. These units have received building permits and will be completed during the planning period. The units associated with single-family homes and manufactured housing are inclusive of seven parcels assumed to develop with duplexes.  
Source: BCAG 2020; Town of Paradise, 2021.

## REZONING

The sites inventory assumes rezoning 10 parcels in the Sewer Service Overlay Zone, shown in Table 4-7 and included in Program HI-4 of this Housing Element. There are parcels identified to be rezoned to the C-S, C-B, and C-C zones. However, the unit yields from these parcels are not included in the sites inventory.

### SITES IN PREVIOUS HOUSING ELEMENTS

This Housing Element reuses 13 sites that were used in the previous Housing Element 2014-2022. Seven of the previously used sites were reported as nonvacant in the previous housing element and 2008-2014 Element while the other six were vacant in the two previous elements. Since the previous element, all 13 sites are now vacant due to fire destruction. See Table 4-8 for information on these sites.

State legislation requires special treatment for nonvacant sites that are repeated from the 5th cycle housing element and vacant sites that are repeated from the 4th and 5th cycle housing elements. In these cases, the housing element must establish a program to rezone the repeated sites to allow residential use by-right for housing developments in which at least 20 percent of the units are affordable to lower income households. However, the program is not necessary if sites are rezoned to a higher density as part of a General

Plan update. Because all 13 sites are within the Sewer Service Overlay, they are being rezoned per Program HI-4 of this Housing Element. The rezoning is not to accommodate a RHNA shortfall but instead is being done in conjunction with the Town's General Plan update. Because the zoning characteristics and current land uses (i.e., changing from nonvacant to vacant) of the sites have changed, they are considered new sites for the purpose of the Housing Element. Therefore, a program to rezone is not necessary.

## AVAILABLE SITES FOR EXTREMELY LOW-, VERY LOW-, AND LOW-INCOME UNITS

Development of extremely low-, very low-, and low-income units is anticipated to occur in the M-F zone in the Sewer Service Overlay since this zone is for exclusively residential development and accommodates densities of 20 du/ac and above. The Town has approximately 525 acres of available sites that will be in the sewer service area, most of which will be rezoned with the overlay to allow densities up to 20 and 30 dwelling units per acre (see Table 4-5). All of these sites were destroyed in the Camp Fire and now vacant and zoned to allow multi-family development.

Although they are not included in the inventory, sites in the C-B, C-C, C-F, and C-S zones could also develop with housing at densities of 20 du/ac and above. Residential development at only half the allowed intensity on these sites would bring another 67 units of affordable housing to Paradise.

Additionally, a portion (approximately 30 percent) of single-family homes are anticipated to be manufactured housing. According to historical contract amount for the manufactured homes in the town, approximately 20 percent of manufactured homes are affordable to lower-income houses.

Chapter 6 includes programs to encourage lot consolidation, provide incentives for small and infill lot development, establish a Sewer Service Overlay, provide incentives for affordable housing and mixed-use development, and encourage development of extremely low-income units.

TABLE 4-7: SEWER AREA REZONING

APN	Address	Acreage	Current General Plan	Proposed General Plan	Current Zoning	Current Allowed Density	Proposed Zoning	Proposed Density	Notes
052-080-084-000	Luther Dr	0.23	TR	C-S	TR 1/3	2	C-S	20 du/ac	Vacant site that abuts commercial area
052-080-083-000	805 Luther Dr	0.48	TR	C-S	TR 1/3	2	C-S	20 du/ac	Vacant site that abuts commercial area
052-080-090-000	806 Luther Dr	0.53	TR	C-S	TR 1/3	2	C-S	20 du/ac	Vacant site that abuts commercial area
052-080-089-000	804 Luther Dr	0.52	TR	C-S	TR 1/3	2	C-S	20 du/ac	Vacant site that abuts commercial area
052-080-069-000	784 Luther Dr	0.31	TR	C-S	TR 1/3	2	C-S	20 du/ac	Vacant site that abuts commercial area
052-191-009-000	3851 Honey Run Rd	0.68	RR	CC	RR 1/2	2	C-B	30 du/ac	Vacant site that abuts commercial area
052-193-017-000	3858 Honey Run Rd	2.45	TR	CC	TR 1/3	2	C-B	30 du/ac	Vacant site that abuts commercial area
053-080-038-000	1000 Brookwood Cir	0.51	TR	TC	TR 1/3	2	C-C	30 du/ac	Rezoning supports the previous multi-family use
053-111-034-000	931 Elliott Road	4.35	CS	M-R	C-S	15	M-F	30 du/ac	Former church site without plans to rebuild
052-204-001-000	5680 Black Olive D	0.29	PI	C-C	C-F	1 du/ac	C-B	30 du/ac	Vacant site

Source: Town of Paradise, 2021.

TABLE 4-8: BY-RIGHT REZONING

APN	Address	Acreage	2014-2022 Element	2008-2014 Element	2022-2030 Housing Element	Current Zoning	Current Allowed Density	Proposed Zoning	Proposed Allowed Density
050-070-060-000	Burdaparadise Ln and Skyway	0.41	Vacant	Vacant	Vacant. Proposed for above-moderate income units given size (less than 0.5 acres).	MF	15 du/ac	MF	30 du/ac
053-080-006-000	Williams and Central Park Dr	1.89	Vacant	Vacant	Vacant. Proposed for lower income units.	MF	15 du/ac	MF	30 du/ac
053-080-005-000	Williams and Central Park Dr	1.84	Vacant	Vacant	Vacant. Proposed for lower income units.	MF	15 du/ac	MF	30 du/ac
053-080-003-000	Williams and Central Park Dr	1.32	Vacant	Vacant	Vacant. Proposed for lower income units.	MF	15 du/ac	MF	30 du/ac
053-080-002-000	Williams and Central Park Dr	1.84	Vacant	Vacant	Vacant. Proposed for lower income units.	MF	15 du/ac	MF	30 du/ac
052-150-054-000	Almond St and Elliot Rd	1.12	Non-Vacant	Non-Vacant	Vacant. Proposed for lower income units.	MF	15 du/ac	MF	30 du/ac
054-080-005-000	Clark Rd and Buschmann Rd	4.77	Vacant	Vacant	Vacant. Proposed for lower income units.	MF	15 du/ac	MF	30 du/ac
052-143-002-000	5754 Black Olive Dr	0.21	Non-Vacant	Non-Vacant	Vacant. Proposed for above-moderate income units given size (less than 0.5 acres).	MF	15 du/ac	MF	30 du/ac
052-160-016-000	5848 Black Olive Dr	0.27	Non-Vacant	Non-Vacant	Vacant. Proposed for above-moderate income units given size (less than 0.5 acres).	MF	15 du/ac	MF	30 du/ac
052-143-010-000	57826 Black Olive Dr	0.66	Non-Vacant	Non-Vacant	Vacant. Proposed for lower income units.	MF	15 du/ac	MF	30 du/ac
052-160-011-000	780 Willow St	0.52	Non-Vacant	Non-Vacant	Vacant. Proposed for lower income units.	MF	15 du/ac	MF	30 du/ac
052-160-013-000	759 Willow St	2.45	Non-Vacant	Non-Vacant	Vacant. Proposed for lower income units.	MF	15 du/ac	MF	30 du/ac
052-160-015-000	5838 Black Olive Dr	3.35	Non-Vacant	Non-Vacant	Vacant. Proposed for lower income units.	MF	15 du/ac	MF	30 du/ac

Source: Town of Paradise, 2021.



### AVAILABLE SITES FOR MODERATE- AND ABOVE-MODERATE INCOME UNITS

Moderate- and above moderate-income units are anticipated to be accommodated by sites that are less than 0.5 acres, sites greater than 10 acres, sites zoned for multi-family development outside of the sewer service area, and/or sites zoned for low-density residential uses (see Table 4-1).

### TOWN OF PARADISE FINANCIAL RESOURCES

#### HOMEBUYER ASSISTANCE

The Town of Paradise offers a deferred loan to eligible first-time home buyers through the Town's First-Time Homebuyer Program (described in Program HI-3). The loan provides a bridge between what borrowers can afford and the amount needed to purchase a home. However, this loan amount is capped and it may not be enough to completely bridge the gap. The loan is secured by a note and a deed of trust on the home. It does not require monthly payments. Repayment of the loan is required when the home is sold, the family stops using it as their principal residence, or title is transferred out of the names of the original borrowers. At the time the loan is repaid, the Town collects its original loan amount, plus interest.

From 2010 to 2015, the Town assisted 133 low to moderate households in Paradise using CDBG and HOME to fund the first-time homebuyer and Owner-Occupied Housing Rehabilitation Programs (see description below). From 2015 to 2021, the Town assisted 66 low to moderate households in Paradise using CDBG and HOME to fund the first-time homebuyer and Owner-Occupied Housing Rehabilitation Programs, and 35 additional families through the CalHome program. The HOME funds had to be used within 12 months of the fire. CalHome, CDBG and HOME funds can be used for households up to 80 percent AMI. CalHome-Disaster Assistance can be used for up to 120 percent AMI.

#### HOUSING REHABILITATION PROGRAM

The Paradise Business and Housing Services Division offers housing rehabilitation programs to town residents through the Owner-Occupied Housing Rehabilitation Program. Loans are available to lower-income Paradise households and cover moderate or substantial rehabilitation to single-family residences for residents who own and live in their home. These programs are funded through HCD in the form of HOME Investment Partnerships Programs and/or the Community Development Block Grant. The purpose of these programs is to maintain the existing housing stock to supply decent housing for low- and very low-income families by providing low-interest or deferred loans to eligible residents.

From 2018 to 2020, the Town issued 19 single-family rehabilitation loans. No loans were made for multi-family housing rehabilitation as only owner-occupied units are eligible. Only one low-income homeowner has been funded through the Town's Owner-Occupied Housing Rehabilitation program in 2020 for home repairs utilizing CDBG and HOME grants. Due to the response and recovery actions necessary for the Town after the 2018 Camp Fire, CDBG activities were on hold for most of the program year as very few homes survived the fire. Direct financial assistance to homebuyers was limited and debris removal/tree removal/general property clean-up was prioritized for most homeowner housing rehabilitation sites. Since the Camp Fire, the highest priority need has been Housing Assistance.

#### PUBLIC/PRIVATE PARTNERSHIP

The Town of Paradise welcomes public/private partnerships with housing and social service agencies. The Town is working with the Community Housing Improvement Program (CHIP) to rebuild Paradise Community Village, which was a 36-unit affordable housing project that was lost in the fire. The Town is also working with Habitat for Humanity to build self-help housing that replaces or adds much-needed low-income units.

The Town is also interested in communicating with any low-income, private developers or social service agencies who might be interested providing the Town with housing and services that benefit the population. Once a sewer is completed, the Town anticipates more opportunities for private/public partnership for affordable housing.

### COMMUNITY DEVELOPMENT BLOCK GRANT-DISASTER RECOVERY (CDBG-DR)

CDBG-DR is a flexible funding source, and may be spent on a variety of housing, infrastructure and economic revitalization projects and programs. However, per the Federal Register and HUD guidance, the State of California will prioritize housing and housing related needs first.

The California Department of Housing and Community Development (HCD) made \$250,687,114 in allocations available in 2019 CDBG-DR funding to support the Multi-Family Housing Program (MHP) of which \$152,610,073.24 is allocated to jurisdictions within Butte County. The Town's allocation is \$55,906,660. This funding is in response to the State's unmet recovery needs for Federal Emergency Management Agency Major Disaster Declarations DR-4407, which includes the November 2018 Camp Fire. The MHP programs are funded to meet the unmet rental housing need.

MHP projects may include apartment complexes, scattered sites, and mixed-use developments, including large rental project development with units of eight or more, and small rental assistance open to landlords with one to seven units. Eligible activities include reconstruction, rehabilitation, and new housing construction. Eligible projects must serve low- to moderate-income households in affordable housing units. Housing project types include large family, special needs, seniors, supportive housing, and at-high-risk.

### COMMUNITY DEVELOPMENT BLOCK GRANT

Since 1994, the Town of Paradise has received an annual allocation of Community Development Block Grant (CDBG) funds from the US Department of

Housing and Urban Development (HUD). This program strives to provide affordable and decent housing, a suitable living environment, and economic opportunities especially for low- to moderate-income (LMI) households and special needs communities. The Town is designated as an entitlement community by HUD, enabling it to be eligible for federal CDBG funds allocated through HUD's Community Planning Development program. These funds will help the Town address the community development objectives outlined by HUD, which include, but are not limited to, affirmatively furthering fair housing, affordable housing activities, public infrastructure and facilities improvements, and public services.

The primary objective for the funding is to develop viable urban communities, principally for low- and moderate-income persons. Eligible CDBG activities include housing assistance programs; public improvement projects, such as parks and infrastructure; land acquisition; business assistance programs that promote economic development; programs that support community organizations that work directly with low- and moderate-income residents; and planning and administration. The Town will receive \$169,740 in CDBG funds for the 2020 program year.

The Town of Paradise will utilize any and all funds available to leverage CDBG funds to make them go as far as possible. The Town has applied for a CalHome grant to assist residents to rebuild their homes after the Camp Fire. CDBG funds will be used to support this effort. The priority needs for the Town are the following, in order:

- Expand and Improve Public Infrastructure and Facilities.
- Public Services and Quality of Life Improvements.
- Affordable Housing Development and Preservation.
- Economic Development Opportunities.

It is estimated that 11,000 homes were destroyed in the 2018 Camp Fire. New housing units is the primary need due to the destruction of most housing units in 2018. The Town of Paradise will utilize any and all funds

## 4. RESOURCES

available to leverage CDBG funds to make them go as far as possible. The Town has applied for a CalHome grant to assist our residents to rebuild their homes after the Camp Fire. CDBG funds will be used to support this effort.

### TENANT-BASED RENTAL ASSISTANCE PROGRAM

The Town introduced a new Tenant-Based Rental Assistance program in 2016 to assist residents with rent payments to allow them to find affordable housing. The program's aim to assist low income or poverty-level families who are unable to afford rent on their own. The goal of the program is to give these families assistance until they are able to afford rent on their own, lifting them out of poverty.

## BUTTE COUNTY AND COMMUNITY PROGRAMS

### SECTION 8 HOUSING CHOICE VOUCHER PROGRAM

The Section 8 Housing Choice Voucher Program provides monthly rental assistance payments to private landlords on behalf of low-income families who have been determined eligible by the Housing Authority. The program's objective is to assist low-income families by providing rental assistance so that families may lease safe, decent, and sanitary housing units in the private rental market. The program is designed to allow families to move without the loss of housing assistance. Moves are permissible as long as the family notifies the Housing Authority ahead of time, terminates its existing lease within the lease provisions, and finds acceptable alternate housing.

The Housing Authority of the County of Butte operates the countywide Section 8 Housing Choice Voucher Program for the county and its incorporated cities. Data at the local level is not available but information from the Housing Authority does provide insight into what resources may be available for residents. Like Paradise, many communities in Butte County were heavily impacted by the 2018 Camp fire and need support. As of 2021, 2,042 families in Butte and Glenn Counties receive tenant-based Section 8 vouchers.

Additionally, the Housing Authority of the County of Butte owns a 12-unit apartment complex in Paradise (Kathy Court Apartments, located at 1561 Kay Court). The units do not fall under any subsidy and are not considered affordable housing, as they are open market units. Their rebuild plans are currently in plan check.

### COMMUNITY ACTION AGENCY OF BUTTE COUNTY

The Community Action Agency (CAA) of Butte County operates a transitional housing program for homeless families with children known as the Esplanade House. The Esplanade House is a transitional housing program designed to provide shelter and essential services for homeless families. The facility houses up to 60 families who live in apartments. The facility was completed in 2004 through the combined efforts of the CAA, the City of Chico, the Esplanade House Children's Fund, the State of California, the Federal Home Loan Bank, and many private donations.

The program offers comprehensive case management and supportive services to families with children. The program provides clients with the necessary tools to become self-sufficient, so the risk of future homelessness is greatly reduced. The Esplanade House is located in Chico. There are no transitional housing programs or emergency shelters for the homeless in Paradise.

### CATALYST WOMEN'S SHELTER

The Catalyst Women's Shelter provides emergency and transitional housing predominantly for abused women and their children. Services are also available for abused men.

## RESOURCES FOR SPECIAL HOUSING NEEDS

Many of the programs discussed in this section are available to assist with addressing special housing needs. Table 4-9 includes a summary of Available Financial Resources, including an indication of those more able to address special needs.

TABLE 4-9: SUMMARY OF FINANCIAL RESOURCES

Program Name	Description	Eligible Activities	Special Housing Needs
<b>Federal Programs</b>			
Community Development Block Grant (CDBG)	Grants available to the Town on a competitive basis for a variety of housing and community development activities. Town competes for funds through the State's allocation process.	<ul style="list-style-type: none"> <li>- Acquisition</li> <li>- Rehabilitation</li> <li>- Homebuyer Assistance</li> <li>- Economic Development</li> <li>- Homeless Assistance</li> <li>- Public Services</li> </ul>	Y
Housing Choice Voucher Program	Assistance program that provides direct funding for rental subsidies for very low-income families.	<ul style="list-style-type: none"> <li>- Rental Assistance</li> </ul>	Y
Section 202	Grants to private nonprofit developers of supportive housing for very low-income seniors.	<ul style="list-style-type: none"> <li>- New Construction</li> </ul>	Y
Housing Rehabilitation Program	Provides financial assistance to low-income homeowners for health and safety improvements.	<ul style="list-style-type: none"> <li>- Rehabilitation</li> </ul>	Y
<b>State Programs</b>			
Affordable Housing Partnership Program (AHPP)	Provides lower interest rate CHFA loans to homebuyers who receive local secondary financing.	<ul style="list-style-type: none"> <li>- Homebuyer Assistance</li> </ul>	
Home Investment Partnership Program (HOME)	Provides grants to local governments and nonprofit agencies, through the State of California, for many homeowner and renter needs.	<ul style="list-style-type: none"> <li>- Homebuyer Assistance</li> <li>- Rehabilitation</li> <li>- New Construction</li> <li>- Rental Assistance</li> </ul>	Y
Building Equity and Growth in Neighborhoods (BEGIN)	A State-funded program administered by HCD that provides low- and moderate-income households up to \$30,000 for a down payment.	<ul style="list-style-type: none"> <li>- Homebuyer Assistance</li> </ul>	
CalHome	Grants awarded to jurisdictions for owner-occupied housing rehabilitation and first-time homebuyer assistance.	<ul style="list-style-type: none"> <li>- Homebuyer Assistance</li> <li>- Rehabilitation</li> </ul>	Y
Single-Family Housing Bond Program (Mortgage Revenue Bonds)	Bonds issued to local lenders and developers so that below market interest rate loans can be issued to first-time homebuyers.	<ul style="list-style-type: none"> <li>- Homebuyer Assistance</li> </ul>	
Low Income Housing Tax Credits (LIHTC)	A 4% annual tax credit that helps owners of rental units develop affordable housing.	<ul style="list-style-type: none"> <li>- New Construction</li> </ul>	
HUD Emergency Shelter Grants (administered through the State)	Competitive grants to help local governments and nonprofits to finance emergency shelters, transitional housing, and other supportive services.	<ul style="list-style-type: none"> <li>- New Construction</li> <li>- Rehabilitation</li> <li>- Homeless Assistance</li> <li>- Public Services</li> </ul>	Y
<b>Local Programs</b>			
First-Time Homebuyer Program	The Town's program provides a deferred loan to eligible first-time homebuyers.	<ul style="list-style-type: none"> <li>- First Time Homebuyer Assistance</li> </ul>	
Rehabilitation Revolving Loan Account	The Town has a revolving loan account that can be used to fund housing-related projects.	<ul style="list-style-type: none"> <li>- Rehabilitation/Reconstruction</li> <li>- Acquisition with Rehabilitation</li> </ul>	Y
Tenant-Based Rental Assistance Program	The Town's Tenant-Based Rental Assistance program assists residents with rent payments to allow them to find affordable housing.	<ul style="list-style-type: none"> <li>- Tenant Assistance</li> </ul>	Y
<b>Private Resources/Financing Programs</b>			
California Community Reinvestment Corporation (CCRC)	Nonprofit mortgage banking consortium designed to provide long-term debt financing for affordable multi-family rental housing. Nonprofit and for-profit developers contact member banks.	<ul style="list-style-type: none"> <li>- New Construction</li> <li>- Rehabilitation</li> <li>- Acquisition</li> </ul>	Y
Federal National Mortgage Association (Fannie Mae)	<ul style="list-style-type: none"> <li>- Fixed-rate mortgages issued by private mortgage insurers.</li> <li>- Mortgages that fund the purchase and rehabilitation of a home.</li> <li>- Low down-payment mortgages for single-family homes in underserved low-income and minority cities.</li> </ul>	<ul style="list-style-type: none"> <li>- Homebuyer Assistance</li> <li>- Homebuyer Assistance</li> <li>- Rehabilitation</li> <li>- Homebuyer Assistance</li> </ul>	

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**TABLE 4-9: SUMMARY OF FINANCIAL RESOURCES**

Program Name	Description	Eligible Activities	Special Housing Needs
Freddie Mac Home Works	Provides first and second mortgages that include rehabilitation loan. County provides gap financing for rehabilitation component. Households earning up to 80 percent Median Family Income (MFI) qualify.	- Homebuyer Assistance	
Affordable Housing Program (Federal Home Loan Bank)	Loans (and some grants) to public agencies and private entities for a wide variety of housing projects and programs. Participation is by FHLB participating lenders.	- New Construction - Homebuyer Assistance - Rehabilitation - Housing Supportive Services	Y

## OTHER STATE AND FEDERAL PROGRAMS

Other State and Federal financial resources supporting housing activities are listed in Table 4-9.

## INCENTIVES FOR AFFORDABLE HOUSING DEVELOPMENT

In addition to the affordable housing resources listed above, the Town offers incentives to promote the development of housing affordable to very low- and low-income households through its Affordable Housing Incentives/Residential Density Bonus Ordinance, which is contained in Chapter 17.44 of the Paradise Municipal Code. As specified in Chapter 17.44, when a developer proposes to enter into an agreement to provide affordable housing pursuant to Government Code Section 65915, the developer is eligible for a housing density bonus and/or incentives if the housing development consists of five or more units.

Any person requesting a housing density bonus or incentives must apply for a development agreement with the Town. A housing density bonus or incentives are granted by approval of the development agreement, which specifies the density bonus and/or incentives and any conditions attached to the approval of the bonus and/or incentive.

The developer may specify the housing density bonus or incentives requested; however, the Town may agree to provide a housing density bonus or incentives other than those requested, as long as such housing density bonus or incentives meet the requirement set forth in

California Government Code Section 65915 et seq. and such action is determined to be consistent with the Housing Element of the Paradise General Plan.

## EXISTING AFFORDABLE HOUSING UNITS

Using many of the resources described above, the Town has been able to create affordable housing units. In addition, many units meet affordability criteria due to their reduced cost or small size. Table 4-10 below lists the existing affordable housing units that are deed restricted.

## QUALIFIED HOUSING ENTITIES

Housing element law states that the Housing Element must identify public and private nonprofit corporations known to the local government which have legal and managerial capacity, and interest in acquiring and managing assisted housing developments. HCD maintains a list of qualified entities who are interested in purchasing government-subsidized multi-family housing projects. The current list of qualified entities for Butte County includes:

- Sandidge and Associates
- Christian Church Homes of Northern California, Inc.
- Community Housing Improvement Program, Inc.
- Housing Authority of the County of Butte
- Northern Valley Catholic Social Service
- ROEM Development Corporation

TABLE 4-10: EXISTING DEED RESTRICTED AFFORDABLE HOUSING UNITS

Name	Address	Program	Deed Restriction Affordability Expiration Date	Units
Paradise Gardens III	1040 Buschmann Rd	USDA Rural Development Multi-Family Housing Rental (Section 515); Section 8 Project-based HAP Senior Housing (515/8 NC)	TBD	48
4758 Skyway	4758 Skyway	Density Bonus	1/15/2045	3
Paradise Community Village	1001 Village Parkway	Low-Income Housing Tax Credit (LIHTC)	2041	36
<b>Total</b>				<b>87</b>

#### 4. RESOURCES

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# CHAPTER 5 | EFFECTIVENESS OF PREVIOUS HOUSING ELEMENT

Accomplishments under the 2014–2022 Housing Element are evaluated in this chapter in order to determine the effectiveness of the previous Housing Element, the Town’s progress in implementing the 2014–2022 Housing Element, and the appropriateness of the housing goals, objectives, and policies. This evaluation is conducted pursuant to Government Code Section 65588.

## REVIEW OF THE PREVIOUS HOUSING ELEMENT

The 2014–2022 Housing Element program strategy focused on the accomplishment of policies and the implementation of programs to encourage the production of new housing, including affordable and special needs housing, to encourage the rehabilitation of existing housing, and to provide housing opportunities for seniors, disabled persons, and large families through provision of appropriate programs and removal of constraints to development of units appropriate for these populations.

The 2014–2022 Housing Element identified quantified objectives for the construction and rehabilitation of housing units. These objectives are compared to achievements in Table 5-1. As shown in Table 5-1, the Town met the new construction objectives, largely due to the rebuilding efforts following the 2018 Camp Fire. The loss of housing units in the Camp Fire is not required to be included in this comparison.

Table 5-2 identifies implementation measures provided in the 2014–2022 Housing Element, describes the results of each program, and recommends whether each policy or implementation program should be kept, modified, or removed in this update.

As described in Table 5-2, the Town had varied results with the programs in the 2014–2022 Housing Element and took steps to reduce constraints to the provision of housing, particularly affordable and special needs housing, and approved the development of a number of affordable units, as well as to bring the Town’s Zoning Ordinance into compliance with State housing law.

## 5. EFFECTIVENESS OF PREVIOUS HOUSING ELEMENT

**TABLE 5-1: COMPARISON OF OBJECTIVES AND ACHIEVEMENTS**

Unit Type	2014-2022 Objectives	Achievements (through 2020)
New Construction		
Extremely Low	2	52
Very Low Income	40	
Low Income	40	312
Moderate Income	80	237
Above Moderate Income	250	745
Total	412	1,346
Rehabilitation		
Extremely Low Income	5	36
Very Low Income	25	
Low Income	25	0
Moderate Income	0	
Above Moderate Income	0	36
Total	55	
Preservation		
Very Low/Low	48	

Source: Housing Element Annual Progress Reports, 2015-2020.

## APPROPRIATENESS OF HOUSING ELEMENT

The 2014–2022 Housing Element includes policies and programs that have been implemented, as well as several outdated measures that do not reflect current housing needs. As discussed in Table 5-2, the majority of policies and programs continue to be appropriate and will either be kept in the Housing Element and revised to address identified housing needs, constraints, or other concerns or maintained without significant revision. Some policies and programs are redundant and will be revised to be more concise. The Housing Plan will also be revised to provide clearly stated goals and to associate policies and programs with the most relevant goals. Quantified objectives will be provided for each program. See Chapter 6 for the goals, policies, and programs of this Housing Element.

TABLE 5-2: EVALUATION OF PREVIOUS HOUSING ELEMENT PROGRAMS

Program	Status of Program Implementation	Continue/Delete/Modify
<p><b>HI-1 REDUCE INFRASTRUCTURE CONSTRAINTS TO DEVELOPMENT</b></p> <p>Continue to reduce infrastructure constraints to new development, particularly those constraints associated with wastewater disposal. The General Plan authorizes an ongoing identification of infrastructure and service limitations including those related to sanitary waste disposal which inhibit housing development.</p> <ul style="list-style-type: none"> <li>The Town will identify programs and resources to address short- and long-term needs while continuing to investigate potential state/federal funding sources. Programs evaluated each year will be identified in the Annual Housing Report (see HI-10). Based on this evaluation, the Town will update the Onsite Manual for the Disposal of Wastewater if needed.</li> <li>The Town will analyze other areas of town with significant high-density residential development potential and determine areas where clustered wastewater treatment systems may be feasible. (2015–2016)</li> <li>The Town will seek funding through available infrastructure, water quality, and wastewater treatment programs to fund the research and development of additional alternative wastewater treatment systems. Potential funding sources for wastewater treatment or infrastructure serving affordable housing include the Small Community Wastewater Grant Program, Infrastructure State Revolving Loan Fund, and Infill Infrastructure Grant Program. Recognizing that available funding sources will change from time to time, the Town will regularly check state grant programs offered by the Department of Health and Human Services, State Water Resources Control Board, Infrastructure and Economic Development Bank, and Department of Housing and Community Development and will aggressively seek funding for alternative wastewater treatment when grant funds are available. (annually and ongoing)</li> </ul> <p>Responsible Party: Community Development Departments  Funding Source: General Fund  Implementation Schedule: Ongoing – timing for specific actions indicated in parentheses  Expected Results: None quantified</p>	<p><u>Status:</u> In March 2021, the LEAP Grant (Local Early Action Planning) was executed with HCD to fund the digital archiving of septic installation maps to be made available to the public which will show property pre-approvals for number of bedrooms and square footage. In addition, archived land use entitlements will be digitized and made available to the public to see existing residential development approvals. Both of these actions will help reduce constraints associated with wastewater as it provides preapproval information to help accelerate the purchase and development of residential parcels in Town.</p> <p>In 2020, the Town contracted with HDR, an engineering consulting firm, to prepare an updated assessment of project options. The assessment compared two alternatives for local wastewater treatment and discharge with a regional alternative involving piping wastewater to the Chico Water Pollution Control Plant (WPCP). The regional alternative was recommended because it had the lowest cost, community impacts, probable environmental impacts as well as the simplest operations and most support from the Central Valley Regional Water Quality Control Board. The Town is now moving forward with preparation of a full Environmental Impact Report (EIR) to provide further information on sewer project alternatives.</p> <p>The Town allows for the application of planned developments to accommodate smaller lot sizes while providing open space for constrained areas as well as clustered wastewater treatment facilities for the development. Reductions in sewage disposal setbacks also reduce constraints to development. Deferral of frontage improvements (through covenants) for projects also helps encourage the development of special needs housing.</p> <p><u>Effectiveness:</u> This program has been effective.</p>	<p>Modify to reflect current conditions and remove anything addressed by the revisions to the Town's Onsite Manual for the Disposal of Wastewater and continue</p>

## 5. EFFECTIVENESS OF PREVIOUS HOUSING ELEMENT

**TABLE 5-2: EVALUATION OF PREVIOUS HOUSING ELEMENT PROGRAMS**

Program	Status of Program Implementation	Continue/Delete/Modify
<p><b>HI-2 AFFORDABLE HOUSING RESOURCES</b></p> <p>Continue to promote affordable housing by working with and assisting developers who are interested in producing affordable housing and by providing staff support, identifying available resources, supporting funding applications, and providing funding when available. The Town will take the following actions:</p> <ul style="list-style-type: none"> <li>Coordinate a housing stakeholders group that includes affordable housing developers, which will meet annually to identify potential housing projects, including affordable new construction, special needs housing, and first-time homebuyer assistance, and prioritize potential funding efforts.</li> <li>Annually encourage nonprofit sponsors to make application to state and federal agencies for affordable senior citizen and/or disabled rental housing.</li> <li>Continue to seek funding for affordable housing rehabilitation and new construction that ensures that a variety of populations are addressed (e.g., once one project is funded, support a different type of project in the next funding round). The approach should maximize the Town's available funding resources, prioritize projects that will be very competitive in the funding process, support new construction for a variety of affordable housing needs, and be based on the interest of developers in providing specific housing types.</li> <li>Continue to pursue various housing program grants to fund down payment assistance to lower-income households, including extremely low-income first-time homebuyers. Continue to fund down payment assistance programs with CDBG, HOME, and CalHOME funds, when feasible and appropriate.</li> <li>Prepare a brochure identifying affordable housing resources and incentives and provide the brochure to development applicants interested in affordable and/or multi-family housing.</li> <li>Consider allocating CDBG funds, when available and appropriate, to assist with preparation of HOME applications and other applicable state and federal program applications in support of affordable housing projects.</li> <li>Annually seek funding from CalHOME and other programs to augment the Town's funding sources. If multiple projects request funding assistance, projects providing at least 25 percent of the units for extremely low- or very low-income households will receive priority for funding assistance.</li> </ul> <p>Responsible Party: Housing Services staff  Funding Source: Restricted grant funds; CDBG; CalHOME, HOME  Implementation Schedule: Stakeholders group formed by December 2015; funding approach and strategy established by March 2016; annual funding applications; pursue</p>	<p><u>Status:</u> Approved float loan for the CHIP affordable housing fire rebuild (CHIP didn't end up needing loan).</p> <p>The Town adopted guidelines in 2016 for a new Tenant Based Rental Assistance Program utilizing HOME grant funds for low-income households and utilized \$7,700 for 2017 applicants and \$2,961 for 2018 applicants.</p> <p>A Development Impact Fee deferral program has been implemented for development applications, including those building affordable and/or multi-family housing.</p> <p>On June 14, 2013, the Town of Paradise was awarded a \$1.7 million CalHOME grant for mortgage assistance to first-time low-income homebuyers. The Town extended \$1,020,384 in loans to 26 first-time homebuyers during 2015-2020. The Town has also assisted 18 additional households with \$671,200 in loans from CDBG and HOME between 2015 and 2021.</p> <p><u>Effectiveness:</u> This program has been effective in acquiring new funding for down payment assistance and assistance for home repairs or reconstruction and will be continued.</p>	<p>Modify to include content of Program HI-13 and continue. Modify to talk about CDBG-DR OOR funding opportunities (+/- 3rd QTR 2021) for SFR &amp; MF housing which the Building &amp; Housing Division will be helping get applicants qualified for.</p> <p>Business &amp; Housing also has secured fire rebuild money (10s of millions) that has to spent within 3 years.</p>

TABLE 5-2: EVALUATION OF PREVIOUS HOUSING ELEMENT PROGRAMS

Program	Status of Program Implementation	Continue/Delete/Modify
<p>down payment assistance funding starting in 2014 and ongoing throughout planning period.</p> <p>Expected Results: 25 affordable family units; 15 senior or disabled units</p>		
<p><b>HI-3 AFFORDABLE HOUSING INCENTIVES</b></p> <p>Provide incentives through project processing and development regulations to promote extremely low-, very low-, and low-income and special needs housing. These incentives will include:</p> <ul style="list-style-type: none"> <li>▪ Expedited processing and approvals for such projects, without jeopardizing environmental quality or the integrity of the overall goals, objectives, and policies of the General Plan.</li> <li>▪ Additional reduction in development standards, such as setbacks, floor area ratios, and lot coverage requirements. Additional incentives will be identified for development of small lots with extremely low-, very low-, and low-income housing and for development of single-room occupancy (SRO) projects.</li> <li>▪ Continue to require only the minimum design standards for housing construction and provide engineered specifications and a residential construction guide to interested builders and property owners.</li> <li>▪ Identify cost-saving and innovative development approaches that may assist developers in providing affordable housing and developing projects at or near maximum densities.</li> <li>▪ Support funding applications in conjunction with HI-2.</li> <li>▪ The incentives will be described in the brochure prepared under HI-2.</li> </ul> <p>Responsible Party: Housing Services and Community Development Department</p> <p>Funding Source: General Fund; CDBG</p> <p>Implementation Schedule: Additional incentives identified by December 2014; brochure prepared by March 2015</p> <p>Expected Results: 25 affordable family units; 15 senior or disabled units (in conjunction with HI-2)</p>	<p><u>Status:</u> Issued building permits in 2019 for a 56-unit senior apartment complex through a density bonus executed with the Town in 2018, which through the small nature of the units (+/- 425 sq ft/unit) will result in affordability.</p> <p>In 2017 issued a Certificate of Occupancy for a 14-unit apartment complex including 3 deed-restricted affordable units approved through a density bonus executed with the Town.</p> <p>In 2016 approved a land use entitlement which included provisions for the execution of a density bonus that could result in up to 7 deed-restricted affordable units.</p> <p>Affordable housing incentive regulations are in place, promoting density bonuses for housing projects that include affordable housing units.</p> <p><u>Effectiveness:</u> This program is considered to be important for the production of affordable housing and as such will be continued.</p>	Continue
<p><b>HI-4 DENSITY BONUS</b></p> <p>Revise the density bonus ordinance (Chapter 17.44) to be consistent with Government Code Sections 65915 and 65917. The ordinance will also identify incentives for affordable housing development.</p> <p>Develop a density bonus brochure that describes how the density bonus program is implemented (e.g., increase in density provided for specific affordability levels), including examples of incentives that an affordable housing project can request, and</p>	<p><u>Status:</u> Zoning ordinance amendments consistent with GC Sections 65915 &amp; 65917 were adopted and implemented in January 2015. Density bonuses currently in-place for multi-family projects utilizing clustered wastewater treatment.</p> <p>Density bonuses were granted for a 56-unit senior apartment development in 2018, a conversion of a motel into studio apartments with density bonus in 2016, and for</p>	Modify to call for revisions to the existing density bonus ordinance (Chapter 17.44 of Municipal Code) to comply with Government Code Sections 65915 and 65917, retain call for brochure with incentive examples, and continue.

## 5. EFFECTIVENESS OF PREVIOUS HOUSING ELEMENT

**TABLE 5-2: EVALUATION OF PREVIOUS HOUSING ELEMENT PROGRAMS**

Program	Status of Program Implementation	Continue/Delete/Modify
<p>provides several examples of development projects with various levels of affordability, the associated density bonus, and the resultant project.</p> <p>Responsible Party: Community Development Department</p> <p>Funding Source: General Fund</p> <p>Implementation Schedule: Chapter 17.44 revised by February 2016</p> <p>Expected Results: None quantified</p>	<p>a 14-unit apartment development in 2015.</p> <p><u>Effectiveness:</u> This program has been effective and will be continued.</p>	
<p><b>HI-5 PUBLICLY OWNED LANDS INVENTORY</b></p> <p>Continue to maintain an inventory of publicly owned land in the town and its sphere of influence for potential housing sites.</p> <p>Responsible Party: Community Development Department</p> <p>Funding Source: General Fund</p> <p>Implementation Schedule: 2014; updated biannually</p> <p>Expected Results: None quantified</p>	<p><u>Status:</u> No new public lands acquired resulting in new housing opportunities since an inventory was compiled in 2009.</p> <p>No new public lands have been acquired that resulted in new housing opportunities since an inventory was compiled in 2009.</p> <p><u>Effectiveness:</u> The Town continues to maintain the publicly owned lands inventory.</p>	Continue
<p><b>HI-6 HOUSING AUTHORITY</b></p> <p>Support the Housing Authority's continued implementation of the conventional Public Housing Rental Program and the Housing Choice Voucher program, which provides rent subsidies directly to participants' landlords, and support that agency's attempts to secure additional funding for expanded programs.</p> <p>Responsible Party: Community Development Department; Housing Services staff</p> <p>Funding Source: General Fund</p> <p>Implementation Schedule: 2014 and ongoing</p> <p>Expected Results: None quantified</p>	<p><u>Status:</u> Ongoing directive; ongoing implementation.</p> <p><u>Effectiveness:</u> The Town's Housing Supervisor sits on the board as a public member and therefore is kept current with the Housing Authority's needs.</p> <p>Town staff responds to all housing complaints filed by the Housing Authority, if and when any complaints are filed. This is an effective program and will be continued.</p>	Modify to clarify language and update name of program to Housing Choice Voucher program and continue
<p><b>HI-7 SMALL LOT CONSOLIDATION AND DEVELOPMENT</b></p> <p>Continue to encourage consolidation of small multi-family parcels as well as small, commercially designated parcels <b>appropriate for residential use.</b></p> <ul style="list-style-type: none"> <li>Encourage parcels aggregated to make up Sites A, B, C, D, and E (see Figure 4-1) to be planned as single sites that can produce at least 24 units per site.</li> <li>Provide incentives to encourage owners of small, contiguous parcels appropriate for affordable housing, including those parcels in Sites A, B, C, D, and E, to consolidate lots.</li> <li>Inform owners of parcels in Sites A, B, C, D, and E of available incentives for lot consolidation and encourage owners to take advantage of such incentives.</li> <li>Assist affordable housing developers with the purchase and consolidation of small, contiguous parcels by providing staff assistance and financial assistance, when</li> </ul>	<p><u>Status:</u> On-going directive. Opportunities for small lot consolidation did not present themselves during this Housing Element cycle.</p> <p>The Town continues to look for opportunities to implement this program. No applications for development have been submitted on Sites A, B, C, D, or E during the planning period.</p> <p><u>Effectiveness:</u> Although no lots consolidated to date, opportunities may arise as owners decide whether to rebuild or sell.</p>	Continue

TABLE 5-2: EVALUATION OF PREVIOUS HOUSING ELEMENT PROGRAMS

Program	Status of Program Implementation	Continue/Delete/Modify
<p>available through CDBG, HOME, or other appropriate funds.  Responsible Party: Community Development Department  Funding Source: General Fund  Implementation Schedule: Zoning Ordinance revised and small lot owners contacted by December 31, 2015.  Expected Results: None quantified</p>		
<p><b>HI-8 PROMOTE SECOND UNITS</b></p> <p>Continue to encourage development of affordable second units by:</p> <ul style="list-style-type: none"> <li>Preparing a Second Units Handbook that provides prototypes preferred by the Town for second units that can be approved with minimal planning and building review. Prototypes should be provided for accessible second units, as well as two-story second units. The handbook will identify incentives for development of affordable second units, including expedited processing, and explain affordability and monitoring requirements.</li> <li>Publicizing the Town's Second Unit Program through handouts available at Town Hall and on the Town's website.</li> </ul> <p>Responsible Party: Housing Services staff  Funding Source: General Fund  Implementation Schedule: Handouts made available at Town Hall and website by December 2014; handbook developed by December 2015  Expected Results: None quantified</p>	<p><u>Status:</u> Grant funding was secured in 2020, through the Wildfire Resiliency &amp; Planning Grant, that will fund the creation of an ADU handbook and mastered ADU plans (built to 2019 CBC) scheduled for 2021. The mastered ADU plans will also be updated in 2022 to comply with building code updates.</p> <p><u>Effectiveness:</u> Implementation is underway, additional promotion will occur after the handbook and plan mastering are completed. This program will be continued.</p>	Continue
<p><b>HI-9 ADDRESS DISCRIMINATION</b></p> <p>The Town's Housing and Business Services Division will continue to provide filing information and direct residents with discrimination complaints to the California Department of Fair Employment and Housing and/or the US Department of Housing and Urban Development. Fair housing/nondiscrimination requirements will continue to be posted at Town Hall and other public facilities. A log of all complaints will be kept and total complaints will be reported in the Annual Report (HI-10).  Responsible Party: Housing Services staff  Funding Source: General Fund  Implementation Schedule: Handouts made available at Town Hall and website by December 2014  Expected Results: None quantified</p>	<p><u>Status:</u> On-going directive. Fair housing/non-discrimination requirements are posted at Paradise Town Hall. No fair housing complaints were filed with the Town during 2014-2020.</p> <p><u>Effectiveness:</u> This program has been effective in providing filing information. This program is considered to be necessary and will be continued.</p>	Continue
<p><b>HI-10 ANNUAL REPORT</b></p> <p>Provide an Annual Report to the Town Council and Planning Commission that describes (1) implementation of Housing Element programs to date, (2) the amount</p>	<p><u>Status:</u> Implemented and ongoing.</p> <p><u>Effectiveness:</u> This is an effective program and will be continued.</p>	Continue



## 5. EFFECTIVENESS OF PREVIOUS HOUSING ELEMENT

**TABLE 5-2: EVALUATION OF PREVIOUS HOUSING ELEMENT PROGRAMS**

Program	Status of Program Implementation	Continue/Delete/Modify
<p>and type of housing activity as related to the Housing Element's goals, policies, and programs, and (3) an updated summary of the Town's housing needs. The Annual Report will address the requirements of Government Code Section 65400. Submit this report to the California Department of Housing and Community Development within 30 days after review by the Town Council.</p> <p>Responsible Party: Planning Division</p> <p>Funding Source: General Fund</p> <p>Implementation Schedule: Winter/Spring 2015; annually thereafter. Annual reports are due April 1st every year.</p> <p>Expected Results: None quantified</p>		
<p><b>HI-11 HOUSING REHABILITATION AND IMPROVEMENT</b></p> <p>Continue to provide housing rehabilitation and repair opportunities for extremely low-income, very low-income, low-income, elderly, disabled, developmentally disabled, and special needs households through:</p> <ul style="list-style-type: none"> <li>Continue to aggressively seek housing rehabilitation funds through CalHOME, HOME, and other state and federal funding sources.</li> <li>Continue operating the CDBG and HOME revolving loan fund to fund housing rehabilitation for very low- and low-income households.</li> <li>Support the applications for County HOME and CDBG funds of local nonprofit and service providers that provide housing rehabilitation and repair programs.</li> <li>Conduct an updated housing conditions survey to identify areas targeted for rehabilitation and use CDBG funds for housing rehabilitation projects in target areas.</li> <li>Update the brochure, when and if programs change (e.g., increased funding amounts, changes to services provided), that summarizes housing rehabilitation and housing repair programs available to lower-income, elderly, disabled, developmentally disabled, and other special needs households.</li> <li>Continue to advertise the availability of housing rehabilitation and repair programs through the distribution of a brochure at Town Hall, on the Town's website, and in conjunction with housing code enforcement activities.</li> </ul> <p>Responsible Party: Housing Services staff</p> <p>Funding Source: Community Development Block Grant; CalHOME</p> <p>Implementation Schedule: Housing rehabilitation program ongoing; complete housing conditions survey by June 2017; update brochure annually</p> <p>Expected Results: 2 to 5 housing rehabilitations per year</p>	<p><u>Status:</u> Fifty-seven (57) low-income homeowners were funded through the Town's Owner-Occupied Housing Rehabilitation program in 2015-2021 for home repairs utilizing CDBG, HOME, and CalHome grants or loans.</p> <p><u>Effectiveness:</u> The Town has been effective in meeting the program objectives. This program will be continued, as it is considered essential.</p>	Continue

TABLE 5-2: EVALUATION OF PREVIOUS HOUSING ELEMENT PROGRAMS

Program	Status of Program Implementation	Continue/Delete/Modify
<b>HI-12 CONDOMINIUM AND MOBILE HOME CONVERSIONS</b>  Revise Chapter 16.10 of the Municipal Code to address both condominium and mobile home park conversion. The revisions will require (1) analysis of rental rates, vacancy rates, and recent growth or decline in the number of multi-family dwellings to determine whether there are adequate housing opportunities for households that may be relocated as the result of a conversion, (2) preparation and implementation of a relocation plan, and (3) relocation assistance to occupants in the event that a mobile home park or apartment complex is converted from rental to another type of housing or use. Responsible Party: Planning Division Funding Source: General Fund Implementation Schedule: Amend code by June 2015 Expected Results: None quantified	<u>Status:</u> Not yet implemented.  <u>Effectiveness:</u> The revisions outlined in the program have not yet been accomplished. This program will be continued.	Continue
<b>HI-13 ENFORCE HOUSING CODES</b>  Provide a safe and decent living environment through enforcement of housing codes, including the following actions: <ul style="list-style-type: none"> <li>Inspect housing upon receiving complaints regarding health and safety problems, and require compliance with applicable codes.</li> <li>Enforce compliance with the applicable Town-adopted housing and building codes to ensure existing residential structures remain in habitable condition.</li> </ul> Responsible Party: Code Enforcement Division Funding Source: General Fund Implementation Schedule: Ongoing Expected Results: None quantified	<u>Status:</u> Procedures are in place through building division for the thorough investigation of housing complaints and the prompt abatement of resulting violations.  <u>Effectiveness:</u> This is an effective program and will be continued.	Continue
<b>HI-14 CONVERSION OF AT-RISK UNITS</b>  Reduce the potential conversion of the 48 assisted affordable housing units at risk during the current planning period to market rate through the following actions: <ul style="list-style-type: none"> <li>Revise the Zoning Ordinance to require a one-year notice to residents, the Town, the Housing Authority of the County of Butte, and the Community Housing Improvement Program (CHIP) of all proposed conversions of assisted affordable (extremely low, very low, low, and/or moderate income) housing units. Following revision of the Zoning Ordinance, provide the owner of each assisted affordable housing complex in the town with the noticing requirements.</li> <li>Continue to maintain communication with the Housing Authority of the County of Butte and local nonprofit housing organizations to monitor the potential conversion of assisted housing units to market-rate housing.</li> </ul>	<u>Status:</u> The Town is notified as a party on title to assisted affordable housing units. Coordination with Butte County Housing Authority is on-going.  <u>Effectiveness:</u> The Zoning Ordinance was not revised to include the noticing requirements of this program. However, the Town would provide this notice if units become at risk. The Paradise Gardens III project has been identified as at risk of conversion. The Town will work to prevent conversion of the 48 assisted units in this project.	Modify to include the number of units at risk during the planning period and continue

## 5. EFFECTIVENESS OF PREVIOUS HOUSING ELEMENT

**TABLE 5-2: EVALUATION OF PREVIOUS HOUSING ELEMENT PROGRAMS**

Program	Status of Program Implementation	Continue/Delete/Modify
<ul style="list-style-type: none"> <li>If conversion of units is likely, work with the Housing Authority of the County of Butte and other organizations as appropriate to seek funding to subsidize the at-risk units in a way that mirrors the HUD Housing Choice Voucher (Section 8) program. Funding sources may include state or local funding sources. Refer tenants of at-risk units to the Housing Authority for education regarding tenant rights and conversion procedures and information regarding Section 8 rent subsidies and any other affordable housing opportunities in the Town.</li> </ul> <p>Responsible Party: Planning Division  Funding Source: General Fund; CDBG; HOME  Implementation Schedule: Revision of Zoning Ordinance by June 2015; ongoing communication with the Housing Authority of the County of Butte and local nonprofits  Expected Results: Preservation of at-risk units</p>		
<p><b>HI-15 REDUCE STANDARDS FOR SENIOR AND DISABLED HOUSING</b></p> <p>Revise the Zoning Ordinance to provide reduced standards for senior and disabled housing, including:</p> <ul style="list-style-type: none"> <li>Reduce the number of required parking spaces for mobile home parks and senior citizen housing projects.</li> <li>Allow reduced parking standards for housing developments associated with seniors and/or persons with disabilities via an administrative Town staff review and approval process.</li> </ul> <p>Responsible Party: Planning Division  Funding Source: General Fund  Implementation Schedule: Amend code by December 2014  Expected Results: 15 disabled or senior housing units</p>	<p><u>Status:</u> Paradise Municipal Code was revised in April 2015 to allow for reduced parking requirements for senior housing.</p>	Delete
<p><b>HI-16 TRANSITIONAL/SUPPORTIVE HOUSING</b></p> <p>Revise the Zoning Ordinance to allow transitional housing and supportive housing consistent with the requirements of state law (Government Code Section 65583(a)(4,5). The Zoning Ordinance will be revised to allow transitional and supportive housing in all zoning districts in the town in the same way other residential uses are allowed in each zoning district, as required by state law. Language identifying transitional housing and supportive housing as permitted uses and subject to the same standards as other residential dwellings of the same type will be included in the Zoning Ordinance.</p> <p>Responsible Party: Planning Division  Funding Source: General Fund  Implementation Schedule: Amend Zoning Ordinance by August 2015  Expected Results: None quantified</p>	<p><u>Status:</u> Grant funding was secured in 2020, through SB2, for the cost of a planning consultant to prepare an ordinance for transitional/supportive housing in 2021.</p>	Continue

TABLE 5-2: EVALUATION OF PREVIOUS HOUSING ELEMENT PROGRAMS

Program	Status of Program Implementation	Continue/Delete/Modify
<p><b>HI-17 HOUSING FOR PERSONS WITH DISABILITIES</b></p> <p>Continue to ensure that new housing for persons with disabilities and home improvements intended to provide accessibility for projects for persons with disabilities are reasonably accommodated.</p> <ul style="list-style-type: none"> <li>Amend Title 15, Buildings and Construction, of the Paradise Municipal Code to identify certain home improvements that provide accessibility for disabled persons as exempt from building permit requirements.</li> <li>Provide exceptions in zoning and land use for housing for persons with disabilities. This procedure will be a ministerial process, with a minimal or no processing fee, subject to approval by the Community Development Director or designee applying the following decision-making criteria: <ul style="list-style-type: none"> <li>The request for reasonable accommodation will be used by an individual with a disability protected under fair housing laws.</li> <li>The requested accommodation is necessary to make housing available to an individual with a disability protected under fair housing laws.</li> <li>The requested accommodation would not impose an undue financial or administrative burden on the Town.</li> <li>The requested accommodation would not require a fundamental alteration in the nature of the Town's land use and zoning program.</li> </ul> </li> <li>Prepare an information brochure designed to help the community understand local zoning regulations, building standards, and programs available to reasonably accommodate persons with disabilities. The brochure will identify which accessibility improvements are exempt from building permit requirements and which accessibility improvements may be permitted over the counter. The brochure will be made available in the following locations: <ul style="list-style-type: none"> <li>Community Development Department counter</li> <li>Town of Paradise website</li> <li>Paradise Senior Center</li> <li>Rehabilitation Program through the Town's Business &amp; Housing Dept</li> <li>Butte County Adult Services</li> <li>Butte County Community Action Agency</li> <li>Feather River Hospital Home Care Services</li> </ul> </li> </ul> <p>Responsible Party: Planning Division; Planning Commission  Funding Source: General Fund  Implementation Schedule: Amend Title 15 and Zoning Ordinance by May 2015; prepare brochure by August 2015  Expected Results: None quantified</p>	<p><u>Status:</u> Housing Rehabilitation Program administered through Business &amp; Housing includes projects involving improvements necessary to ensure accessibility for disabled persons.</p> <p><u>Effectiveness:</u> The Town was somewhat effective in completing the objectives of this program, which was partially implemented. However, parking requirements are still considered an impediment. This program will be modified and continued.</p>	<p>Modify to remove the portions of the program that have been implemented and continue.</p> <p>Keep the program about identifying building activities exempt from permit for accessibility.</p>

## 5. EFFECTIVENESS OF PREVIOUS HOUSING ELEMENT

**TABLE 5-2: EVALUATION OF PREVIOUS HOUSING ELEMENT PROGRAMS**

Program	Status of Program Implementation	Continue/Delete/Modify
<p><b>HI-18 SPECIAL NEEDS HOUSING</b></p> <p>Provide incentives, such as a density bonus, expedited processing, relaxation of development standards, etc., to encourage development of housing for persons with special needs. Incentives will be identified in the brochure developed to promote affordable housing (HI-2) and will be codified where appropriate. In addition, the Town will work with the Far Northern Regional Center to implement an outreach program that informs families in Paradise on housing and services specifically available for persons with developmental disabilities. The program could include the development of an informational brochure, including information on services on the Town's website, and providing housing-related training for individuals/families through workshops.</p> <p>Responsible Party: Planning Division Funding Source: General Fund Funding: General Fund; Federal Housing Opportunities for Persons with AIDS, California Child Care Facilities Finance Program, and other state and federal programs designated specifically for special needs groups for efforts to address needs of those with developmental disabilities Implementation Schedule: Development of outreach program within one year of adopting the Housing Element; prepare brochure by February 2015 Expected Results: None quantified</p>	<p><u>Status:</u> Approved a minor use permit for a 56-unit senior housing development (special needs housing) in June 2018 that included a 13% density bonus.</p> <p>The Housing Rehabilitation Program administered through the Business and Housing Services Division includes projects involving improvements necessary to ensure accessibility for disabled persons.</p> <p>Development Impact Fee deferral program has been implemented for development applications, including those building affordable and/or multi-family housing.</p> <p><u>Effectiveness:</u> While projects for the improvement of buildings to assist disabled persons have been completed during the planning period, Title 15 has not been amended nor has an informational brochure been completed. As such, this program will be continued.</p>	<p>Modify to require that transitional and supportive housing is allowed in all zones allowing residential in the same way other residential uses are allowed per <b>state law and continue.</b></p> <p>Modify to remove portions of the program that were implemented and to address requirements of SB 812 for the developmentally disabled and continue.</p> <p>Modify to clarify how this program implements state requirements for a reasonable accommodation procedure or ordinance and continue.</p>
<p><b>HI-19 FARM LABOR HOUSING</b></p> <p>To comply with the state's Employee Housing Act (Health and Safety Code Sections 17021.5 and 17021.6), the Town will amend the Zoning Ordinance to treat employee and farm labor housing that serves six or fewer persons as a single-family structure and permitted in the same manner as other single-family structures of the same type in the same zone (Section 17021.5). The Zoning Ordinance will also be amended to treat employee and farm labor housing consisting of no more than 12 units or 36 beds as an agricultural use and permitted in the same manner as other agricultural uses in the same zone (Section 17021.6) in zones where agricultural uses are permitted.</p> <p>Responsible Party: Planning Division Funding Source: General Fund Implementation Schedule: Amend Zoning Ordinance by July 2015 Expected Results: None quantified</p>	<p><u>Status:</u> Paradise Municipal Code zoning ordinance amended November 2016 to include Agricultural Employee Housing.</p> <p><u>Effectiveness:</u> Completed</p>	<p>Delete</p>

TABLE 5-2: EVALUATION OF PREVIOUS HOUSING ELEMENT PROGRAMS

Program	Status of Program Implementation	Continue/Delete/Modify
<b>HI-20 ENERGY CONSERVATION AND EFFICIENCY</b> Promote energy efficiency and conservation in residential development by: <ul style="list-style-type: none"> <li>Continuing to incorporate green building standards, including alternative design and building approaches, into the Municipal Code.</li> <li>Continuing to review the Town's land use regulations and subdivision ordinances and, where appropriate, amend to include provisions that promote and/or require energy conservation measures as a factor in project approval.</li> <li>Continuing to support inclusion of weatherization activities including, but not limited to, weatherization, siding, and dual-pane windows in the Housing Rehabilitation program.</li> <li>Continuing to support the SaveUEnergy program operated by Community Action Agency services, which provides free energy audits and energy-saving services to low-income households and for a small fee to non-low-income households, by advertising the availability of this program in the Town's Housing Rehabilitation Program brochure.</li> </ul> Responsible Party:  Community Development Department Funding Source: General Fund Implementation Schedule: Every two years beginning in 2015, review and revise codes as necessary Expected Results: None quantified	<p><u>Status:</u> Adopted 2019 CA Building Codes which incorporate mandatory green building standards. Residential solar permits are a reduced flat-fee and fast tracked through plan check.</p> <p><u>Effectiveness:</u> While the implementation of the deferral program will assist in the development of special needs housing, no brochure has been developed. Additionally, the Town recognizes that incentives to promote special needs housing is an ongoing necessity. As such, this program will be continued.</p>	Continue

## 5. EFFECTIVENESS OF PREVIOUS HOUSING ELEMENT

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## CHAPTER 6 | HOUSING GOALS, POLICIES, AND PROGRAMS

This chapter describes housing goals, policies, and programs for the Town of Paradise. A goal is defined as a general statement of the highest aspirations of the community. A policy is a course of action chosen from among many possible alternatives. It guides decision-making and provides a framework around which the housing programs operate. A program is a specific action that implements the policy and moves the community toward the achievement of its goals. Programs are a part of the Town's eight-year action plan and constitute the Town's local housing strategy.

### GOALS, POLICIES, AND PROGRAMS

The goals of this Housing Element serve at the local level to enhance and build upon State of California goals for providing safe, decent, and affordable housing available for all Town residents. These goals encompass new construction, conservation of existing stock, affordability, and provision of adequate housing for all persons.

- HG-1 – Encourage and facilitate the production of all housing types, from affordable workforce housing to executive homes, to meet the Town's share of regional housing needs consistent with the overall goals, objectives, and policies of the Paradise General Plan.
- HG-2 – Improve, rebuild, and preserve safe, decent housing and neighborhoods for all Paradise residents, including preparation for wildfire resiliency.
- HG-3 – Reasonably accommodate housing designed for persons with special housing needs.
- HG-4 – Encourage energy-efficient resources in new residential development as well as in the existing housing stock.
- HG-5 – Affirmatively further fair housing by providing equal housing opportunities for all existing and future Paradise residents.

Goals, policies, and implementation measures from the 2009–2014 Housing Element have been incorporated herein or updated, otherwise modified, or deleted as deemed appropriate. For each implementation measure, the party responsible for implementation, funding source, timing of implementation, and quantified results (where appropriate) are identified.

## 6. HOUSING GOALS, POLICIES, AND PROGRAMS

Goals, policies, and implementation measures from the 2014-2022 Housing Element have been incorporated herein or updated, otherwise modified, or deleted as deemed appropriate. For each implementation measure, the party responsible for implementation, funding source, timing of implementation, and quantified results (where appropriate) are identified.

Housing goals are the high-level desired results that the Town will attempt to reach over the long term. They are denoted by "HG." Housing policies are specific statements that serve as a guide to Town staff, decision makers, and housing stakeholders. They are denoted by "HP." Housing implementation measures translate goals and policies into actions. They are denoted by "HI". Where programs require Planning Commission and/or Town Council approval, such as amendments to the Municipal Code or Zoning Ordinance, the Planning Commission and/or Town Council are also entities responsible for implementation.

### HG-1 ENCOURAGE AND FACILITATE THE PRODUCTION OF ALL HOUSING TYPES, FROM AFFORDABLE WORKFORCE HOUSING TO EXECUTIVE HOMES, TO MEET THE TOWN'S SHARE OF REGIONAL HOUSING NEEDS CONSISTENT WITH THE OVERALL GOALS, OBJECTIVES, AND POLICIES OF THE PARADISE GENERAL PLAN.

- HP-1 The Town will encourage a full range of housing types, including both lower- and higher-density housing, at rents and sales prices suitable for a range of household incomes, including extremely low, very low, low, and moderate.
- HP-2 The General Plan will identify lands most suitable for multi-family development and safeguard this type of use on these sites.
- HP-3 The Town will maintain a sufficient inventory of appropriately zoned land to accommodate the timely development of new housing. The inventory will be prepared and maintained by the Community Development Department.

- HP-4 The Town will promote balanced and orderly residential growth to minimize or avoid unnecessary development costs that add to the cost of housing.
- HP-5 New residential development will be directed to areas of the community where essential public facilities and services are available or can be provided at a reasonable cost.
- HP-6 The Town will encourage the production and availability of new affordable housing through a variety of measures including the density bonus program and second unit development, providing incentives such as expedited processing, relaxed zoning restrictions where appropriate, support for funding applications, and Community Development Block Grant (CDBG) funds when available.
- HP-7 The Town will promote development of infill housing, residential, and mixed uses in the Central Commercial area, through continuing to allow appropriate residential uses in commercial zones and continuing to provide flexibility in development standards for mixed-use projects.
- HP-8 The Town will encourage providers to give priority to the very low- and low-income housing developments pursuant to Government Code Section 65589.7. The Town will also provide a copy of the 2022-2030 Housing Element to local water providers upon its adoption. Should a public sewer system, such as an off-site clustered system or alternative wastewater treatment system, be developed and made available, the Town will provide its operator with a copy of the Housing Element and encourage the operator to give priority to very low- and low-income housing developments pursuant to Government Code Section 65589.7.
- HP-9 The Town will pursue county, State, and federal programs and funding sources that provide

housing opportunities for low- and moderate-income households.

- HP-10 In accordance with applicable federal and State laws, the Town will promote equal housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, or color.
- HP-11 The Planning Commission and Town Council will annually review progress in implementing the Housing Element including the progress in achieving its objectives and meeting its share of regional housing needs.
- HP-12 The Town will pursue the development of tiny home villages to be used as affordable housing.
- HP-13 Coordinate an introductory meeting(s) with housing developers working on innovative housing and disaster recovery solutions (e.g., FactoryOS, Jamboree, and Boxabl) to explore potential partnerships, such as master approved plans for factory-built products.

### **HI-1 REDUCE INFRASTRUCTURE CONSTRAINTS TO DEVELOPMENT**

Continue to reduce infrastructure constraints to new development, particularly those constraints associated with wastewater disposal. The General Plan authorizes an ongoing identification of infrastructure and service limitations including those related to sanitary waste disposal which inhibit housing development. In Fall 2020, the Paradise Town Council approved the start of an 18-month EIR for a regional sewer option. In addition, a sewer committee was formed between the Town, City of Chico, and the Regional Water Board. The Town will continue to study the feasibility of the Paradise Sewer Project, including pursuing funding for the design and construction phases. Potential funding sources include a State appropriation (working in conjunction with the City of Chico and the Central Valley Regional Water Quality Control Board), U.S. Department of Agriculture Rural Development funds, HCD Community Development Block Grants – Disaster Relief (CDBG-DR), and US Economics Development

Administration (EDA) funds. The Town will continue to educate community members and property owners in the Sewer Service Area (SSA) about the timing of the project and how it affects development opportunities.

In March 2021, the LEAP Grant (Local Early Action Planning) was executed with HCD to fund the digital archiving of septic installation maps to be made available to the public which will show property pre-approvals for number of bedrooms and square footage. In addition, archived land use entitlements will be digitized and made available to the public to see existing residential development approvals. Both of these actions will help reduce constraints associated with wastewater as it provides preapproval information to help accelerate the purchase and development of residential parcels in Town.

Outside the SSA, the Town will seek funding through available infrastructure, water quality, and wastewater treatment programs to fund the research and development of additional alternative wastewater treatment systems. Potential funding sources for wastewater treatment or infrastructure serving affordable housing include the Small Community Wastewater Grant Program, Infrastructure State Revolving Loan Fund, and Infill Infrastructure Grant Program. Recognizing that available funding sources will change from time to time, the Town will regularly check state grant programs offered by the Department of Health and Human Services, State Water Resources Control Board, Infrastructure and Economic Development Bank, and Department of Housing and Community Development and will aggressively seek funding for alternative wastewater treatment when grant funds are available. (Annually and ongoing)

The Town will allow for the application of planned developments to accommodate smaller lot sizes while providing open space for constrained areas as well as clustered wastewater treatment facilities for the development. Reductions in sewage disposal setbacks also reduce constraints to development. Deferral of frontage improvements (through covenants) for projects also helps encourage the development of special needs housing.

## 6. HOUSING GOALS, POLICIES, AND PROGRAMS

Responsible Party: Community Development Departments

Funding Source: General Fund

Implementation Schedule: Ongoing – timing for specific actions indicated in parentheses

Expected Results: None quantified

### HI-2 AFFORDABLE HOUSING RESOURCES

Continue to promote affordable housing by working with and assisting developers who are interested in producing affordable housing and by providing staff support, identifying available resources, supporting funding applications, and providing funding when available. The Town will take the following actions:

- Coordinate a housing stakeholders group that includes affordable housing developers, which will meet annually to identify potential housing projects, including affordable new construction, special needs housing, and first-time homebuyer assistance, and prioritize potential funding efforts.
- Annually encourage nonprofit sponsors to make application to state and federal agencies for affordable senior citizen and/or disabled rental housing.
- Continue to seek funding for affordable housing rehabilitation and new construction that ensures that a variety of populations are addressed (e.g., once one project is funded, support a different type of project in the next funding round). The approach should maximize the Town's available funding resources, prioritize projects that will be very competitive in the funding process, support new construction for a variety of affordable housing needs, and be based on the interest of developers in providing specific housing types.
- Continue to pursue various housing program grants to fund down payment assistance to lower-income households, including extremely low-income first-time homebuyers. Continue to fund down payment assistance programs with CDBG, HOME, and CalHOME funds, when feasible and appropriate.

- Prepare a brochure identifying affordable housing resources and incentives and provide the brochure to development applicants interested in affordable and/or multi-family housing.
- Consider allocating CDBG funds, when available and appropriate, to assist with preparation of HOME applications and other applicable State and federal program applications in support of affordable housing projects.
- Annually seek funding from CalHOME and other programs to augment the Town's funding sources. If multiple projects request funding assistance, projects providing at least 25 percent of the units for extremely low- or very low-income households will receive priority for funding assistance.

Responsible Party: Housing Services staff

Funding Source: Restricted grant funds; CDBG; CalHOME, HOME, Town of Paradise Building and Housing Division

Implementation Schedule: Program funding ongoing. Housing stakeholders group to be held by July 2022. Affordable housing brochure prepared by December 2022.

### HI-3 AFFORDABLE HOUSING INCENTIVES

Provide incentives through project processing and development regulations to promote extremely low-, very low-, and low-income and special needs housing. These incentives will include:

- Expedited processing and approvals for such projects, without jeopardizing environmental quality or the integrity of the overall goals, objectives, and policies of the General Plan.
- Additional reduction in development standards, such as setbacks, floor area ratios, minimum parking spaces, and lot coverage requirements. Additional incentives will be identified for development of small lots with extremely low-, very low-, and low-income housing and for development of single-room occupancy (SRO) projects.
- Continue to require only the minimum design standards for housing construction, and provide



engineered specifications and a residential construction guide to interested builders and property owners.

- Identify cost-saving and innovative development approaches that may assist developers in providing affordable housing and developing projects at or near maximum densities.
- Support funding applications in conjunction with HI-2.

The incentives will be described in the brochure prepared under HI-2.

Responsible Party: Housing Services and Community Development Department

Funding Source: General Fund; CDBG

Implementation Schedule: Additional incentives identified by; brochure prepared by December 2022

Expected Results: 25 affordable family units; 15 senior or disabled units (in conjunction with HI-2)

### **HI-4 DENSITY BONUS, SSA OVERLAY, AND OTHER OPPORTUNITIES FOR INCREASED DENSITY**

Revise the density bonus ordinance (Chapter 17.44) to be consistent with Government Code Sections 65915 and 65917 and identify incentives for affordable housing development.

Develop a density bonus brochure that describes how the density bonus program is implemented (e.g., increase in density provided for specific affordability levels), including examples of incentives that an affordable housing project can request, and provides several examples of development projects with various levels of affordability, the associated density bonus, and the resultant project.

Identify neighborhoods where tiny home villages can be a permitted by right land use and modify the Zoning Ordinance and Building Code to remove barriers to these smaller housing typologies while ensuring they are safe and built to the proper codes. Mobile home parks that were destroyed and are not rebuilding could be considered one opportunity area for tiny home villages.

Perform the rezonings described in Chapter 4 for key parcels in the SSA and establish a Sewer Service Overlay zone to allow increased densities up to 30 dwelling units/acre in the SSA. The Overlay will only apply to properties with underlying zoning districts that allow multi-family and mixed-use residential development.

Explore the feasibility of incentivizing a mix of active ground-floor uses with residential units above in the heart of the Downtown Walkable Area. Such incentives could include charging commercial impact fee rates for the entire structure (instead of commercial and residential) to achieve cost savings or allowing shared parking by right.

Responsible Party: Community Development Department

Funding Source: General Fund

Implementation Schedule: Chapter 17.44 revised by August 2022. Identifying incentives for affordable housing by February 2023. Develop a density bonus brochure by June 2023. Identify areas for tiny home villages by December 2023. Explore incentivizing mixed-use developments in the walkable Downtown by June 2024. Rezoning for key parcels in the SSA by January 2025.

Expected Results: None quantified

### **HI-5 PUBLICLY OWNED LANDS INVENTORY**

Continue to maintain an inventory of publicly owned land in the town and its sphere of influence for potential housing sites.

Responsible Party: Community Development Department

Funding Source: General Fund

Implementation Schedule: updated biannually

Expected Results: None quantified

### **HI-6 HOUSING AUTHORITY**

Support the Housing Authority's continued implementation of the conventional Public Housing Rental Program and the Housing Choice Voucher program, which provides rent subsidies directly to participants' landlords, and support that agency's attempts to secure additional funding for expanded programs.

Responsible Party: Community Development Department, Housing Services staff

Funding Source: General Fund

Implementation Schedule: Ongoing

## 6. HOUSING GOALS, POLICIES, AND PROGRAMS

Expected Results: None quantified

### HI-7 SMALL LOT CONSOLIDATION AND DEVELOPMENT

Continue to encourage consolidation of small multi-family parcels as well as small, commercially designated parcels appropriate for residential use.

- Provide incentives to encourage owners of small, contiguous parcels appropriate for affordable housing to consolidate lots. Incentives could include deferring fees specifically for consolidation, expediting permit processing, and/or providing flexible development standards such as setback requirements or reduced parking.
- Inform owners of parcels in Consolidated Sites B and D of available incentives for lot consolidation and encourage owners to take advantage of such incentives.
- Assist affordable housing developers with the purchase and consolidation of small, contiguous parcels by providing staff assistance and financial assistance, when available through CDBG, HOME, or other appropriate funds.

Responsible Party: Community Development Department

Funding Source: General Fund

Implementation Schedule: Small lot owners contacted by June 2023.

Expected Results: None quantified

### HI-8 PROMOTE SECOND UNITS

Continue to encourage development of affordable second units by:

- Preparing a Second Units Handbook that provides information on ADU plans preapproved by the Town for second units that can be approved with minimal planning and building review. ADU plans should be provided for accessible second units, as well as two-story second units. The handbook will identify incentives for development of affordable second units, including expedited processing, and explain affordability and monitoring requirements.

- Publicizing the Town's Second Unit Program through handouts available at Town Hall and on the Town's website.
- Exploring partnerships with prefabricated ADU manufacturers to include their designs in the pre-approved prototypes.

Responsible Party: Housing Services staff

Funding Source: General Fund, Wildfire Resiliency & Planning Grant

Implementation Schedule: December 2022

Expected Results: 12-15 ADUs created through the mastered ADU plans and 30-40 ADUs permitted during the Housing Element cycle.

### HI-9 ADDRESS DISCRIMINATION

The Town's Housing and Business Services Division will continue to provide filing information and direct residents with discrimination complaints to the California Department of Fair Employment and Housing and/or the US Department of Housing and Urban Development. Fair housing/nondiscrimination requirements will continue to be posted at Town Hall and other public facilities. A log of all complaints will be kept and total complaints will be reported in the Annual Report (HI-10).

Responsible Party: Housing Services staff

Funding Source: General Fund

Implementation Schedule: Ongoing

Expected Results: None quantified

### HI-10 ANNUAL REPORT

Provide an Annual Report to the Town Council and Planning Commission that describes (1) implementation of Housing Element programs to date, (2) the amount and type of housing activity as related to the Housing Element's goals, policies, and programs, and (3) an updated summary of the Town's housing needs. The Annual Report will address the requirements of Government Code Section 65400. Submit this report to the California Department of Housing and Community Development within 30 days after review by the Town Council.

Responsible Party: Planning Division

Funding Source: General Fund

Implementation Schedule: Ongoing

Expected Results: None quantified

### HG-2 IMPROVE, REBUILD, AND PRESERVE SAFE, DECENT HOUSING AND NEIGHBORHOODS FOR ALL PARADISE RESIDENTS, INCLUDING PREPARATION FOR WILDFIRE RESILIENCY.

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- HP-14 The Town will encourage the maintenance and improvement of its residential areas.
- HP-15 The Town will design and implement housing programs that maximize access to the market, such as housing rehabilitation, including replacement housing, and down payment assistance for first-time homebuyers.
- HP-16 The Town will support and encourage public and private efforts to provide ongoing home improvement and neighborhood rehabilitation programs.
- HP-17 New housing and rehabilitated housing will be constructed in accordance with design standards and Town-adopted Building Code requirements that will ensure the safety and integrity of each housing unit.
- HP-18 The Town will continue to provide a revolving loan fund for housing rehabilitation and down payment assistance programs.
- HP-19 The Town will support the continuance and expansion of the Housing Authority's rental assistance program.
- HP-20 The Town will regulate conversion of housing stock that, by its nature, is affordable to residents of modest means, such as apartments and mobile homes, to either market-rate, for-sale, or nonresidential uses, by requiring such conversions to provide a housing relocation plan and replacement assistance to residents who would be displaced by the conversion and by requiring that the Town make a finding of clear public benefit.
- HP-21 Provided staffing and funding are available, the Town will monitor the quality of the local housing stock.

- HP-22 The Town will encourage safe and decent housing through demolition of dilapidated units that cannot be cost-effectively improved to code standard.
- HP-23 The Town will consider increased building and landscaping requirements for fire resiliency and add supportive programs to assist households with vegetation management. The Town will consider providing grants or no-interest loans to low-income households for home hardening to ensure the most vulnerable households are not left behind.
- HP-24 The Town will work with local fire officials to educate homeowners and landlords through community meetings, mailers, and participation in community events on how to reduce fire risk to structures and landscaping as wildfire risk continues to increase due to climate change.
- HP-25 The Town will look into additional funding mechanisms to improve programs for fire safe construction and fire maintenance, including the feasibility of impact fees.
- HP-26 The Town will encourage the acquisition of high hazard parcels on the periphery of town (i.e., the Wildfire Risk Reduction Buffers identified by the Conservation Biology Institute) for open space or similar uses that serve as wildfire buffers. Explore zoning changes or other policy tools like the Bureau of Land Management's Area of Critical Environmental Concern planning process to discourage or prohibit development in the most dangerous places.
- HP-27 The Town will engage with insurance companies in the area to identify ways to align insurance policies and incentive programs with wildfire mitigation priorities, such as maintaining defensible space requirements or home hardening programs and ensure that affordable and accessible wildfire insurance is available to all residents.



## 6. HOUSING GOALS, POLICIES, AND PROGRAMS

HP-28 The Town will support post-disaster funding for multi-family and affordable housing development.

### HI-11 HOUSING REHABILITATION AND IMPROVEMENT

Continue to provide housing rehabilitation and repair opportunities for extremely low-income, very low-income, low-income, elderly, disabled, developmentally disabled, and special needs households through:

- Continue to aggressively seek housing rehabilitation funds through CalHOME, HOME, and other state and federal funding sources.
- Continue operating the CDBG and HOME revolving loan fund to fund housing rehabilitation for very low- and low-income households.
- Support the applications for County HOME and CDBG funds of local nonprofit and service providers that provide housing rehabilitation and repair programs.
- Conduct an updated housing conditions survey to identify areas targeted for rehabilitation and use CDBG funds for housing rehabilitation projects in target areas.
- Update the brochure, when and if programs change (e.g., increased funding amounts, changes to services provided), that summarizes housing rehabilitation and housing repair programs available to lower-income, elderly, disabled, developmentally disabled, and other special needs households.
- Continue to advertise the availability of housing rehabilitation and repair programs through the distribution of a brochure at Town Hall, on the Town's website, and in conjunction with housing code enforcement activities.

Responsible Party: Housing Services staff

Funding Source: Community Development Block Grant; CalHOME

Implementation Schedule: Updated housing conditions survey by December 2023.

Expected Results: 2 to 5 housing rehabilitations per year

### HI-12 CONDOMINIUM AND MOBILE HOME CONVERSIONS

Revise Chapter 16.10 of the Municipal Code to address both condominium and mobile home park conversion. The revisions will require (1) analysis of rental rates, vacancy rates, and recent growth or decline in the number of multi-family dwellings to determine whether there are adequate housing opportunities for households that may be relocated as the result of a conversion, (2) preparation and implementation of a relocation plan, and (3) relocation assistance to occupants in the event that a mobile home park or apartment complex is converted from rental to another type of housing or use.

Responsible Party: Planning Division

Funding Source: General Fund

Implementation Schedule: Municipal Code revised by June 2024.

Expected Results: None quantified

### HI-13 ENFORCE HOUSING CODES

Provide a safe and decent living environment through enforcement of housing codes, including the following actions:

- Inspect housing upon receiving complaints regarding health and safety problems, and require compliance with applicable codes.
- Enforce compliance with the applicable Town-adopted housing and building codes to ensure existing residential structures remain in habitable condition.

Responsible Party: Code Enforcement Division

Funding Source: General Fund

Implementation Schedule: Ongoing

Expected Results: None quantified

### HI-14 FIRE RESILIENCY

Increase wildfire resiliency through the following actions:

- Update the Town's Safety Element.
- Establish and implement the Sewer Service Overlay Zone to incentivize development in accessible areas outside of Wildfire Risk Reduction Buffers.

- Identify and meet with local insurance companies and the Paradise Ridge and Butte County Fire Safe Councils to explore home hardening programs that allow policyholders to lower their rates through home hardening, vegetation management, or other risk reduction measures.
- In partnership with CAL FIRE and the Paradise Ridge and Butte County Fire Safe Councils, create and disseminate educational materials on fire-safe practices.
- Meet with the Paradise Recreation & Parks Department, the Nature Conservancy, Conservation Biology Institute, and other stakeholders to identify the highest priority parcels for Wildfire Risk Reduction Buffers.
- Create an equitable community engagement plan to identify parcels to target for Wildfire Risk Reduction Buffers and a menu of incentives and disincentives to facilitate appropriate uses, home hardening, vegetation management, or other risk reduction measures on the identified parcels.

Responsible Party: Planning Division and Fire Department

Funding Source: General Fund

Implementation Schedule: Safety Element Adoption by July 2022. Meetings with insurance companies by October 2022. Meeting on Wildfire Risk Reduction Buffers by January 2023. Community engagement plan on Wildfire Risk Reduction Buffers by August 2023.

Expected Results: None quantified

### HG-3 REASONABLY ACCOMMODATE HOUSING DESIGNED FOR PERSONS WITH SPECIAL HOUSING NEEDS.

- HP-29 The Town will continue to encourage the development and expansion of housing opportunities for the elderly and the disabled through techniques such as smaller unit sizes, a reduction in parking space requirements, common dining facilities, and fewer but adequate amenities.
- HP-30 The Town will encourage development of suitable sites with rest homes and care facilities

for the elderly and the disabled and developmentally disabled and will encourage senior citizen housing in the Central Commercial area of Paradise.

- HP-31 The Town will facilitate housing opportunities for the homeless by accommodating transitional and supportive housing and allowing emergency, transitional, and supportive housing consistent with state law.
- HP-32 The Town will encourage development housing types and programs for senior citizens, the disabled, developmentally disabled, large families, and other groups identified as having special housing needs.
- HP-33 The Town will continue to require the first floors of multi-family developments to accommodate access and use by the elderly and the disabled.
- HP-34 The Town will continue to assess the Zoning Ordinance, Municipal Code, and Town procedures for constraints and address changes in state law, particularly regarding housing for special needs groups, including seniors, the disabled, developmentally disabled, large families, farmworkers, and the homeless.

### HI-15 TRANSITIONAL/SUPPORTIVE HOUSING

Revise the Zoning Ordinance to allow transitional housing and supportive housing by-right in zones where multi-family and mixed uses are permitted, including nonresidential zones permitting multi-family uses pursuant to Government Code section 65651. Language identifying transitional housing and supportive housing as permitted uses and subject to the same standards as other residential dwellings of the same type will be included in the Zoning Ordinance.

Grant funding was secured to perform this revision.

Responsible Party: Planning Division

Funding Source: General Fund, SB2 Grant Funding

Implementation Schedule: Amend Zoning Ordinance by January 2025.

Expected Results: None quantified

## 6. HOUSING GOALS, POLICIES, AND PROGRAMS

### HI-16 HOUSING FOR PERSONS WITH DISABILITIES

Continue to ensure that new housing for persons with disabilities and home improvements intended to provide accessibility for projects for persons with disabilities are reasonably accommodated.

- Amend Title 15, Buildings and Construction, of the Paradise Municipal Code to identify certain home improvements that provide accessibility for disabled persons as exempt from building permit requirements.
- Provide exceptions in zoning and land use for housing for persons with disabilities. This procedure will be a ministerial process, with a minimal or no processing fee, subject to approval by the Community Development Director or designee applying the following decision-making criteria:
  - The request for reasonable accommodation will be used by an individual with a disability protected under fair housing laws.
  - The requested accommodation is necessary to make housing available to an individual with a disability protected under fair housing laws.
  - The requested accommodation would not impose an undue financial or administrative burden on the Town.
  - The requested accommodation would not require a fundamental alteration in the nature of the Town's land use and zoning program.
  - Prepare an information brochure designed to help the community understand local zoning regulations, building standards, and programs available to reasonably accommodate persons with disabilities. The brochure will identify which accessibility improvements are exempt from building permit requirements and which accessibility improvements may be permitted over the counter.
- The brochure will be made available in the following locations:
  - Building Resiliency Center

- Housing Division counter
- Disability Action Center website
- Butte County Adult Services
- Paradise Veterans Memorial Hall
- Town of Paradise website

Responsible Party: Planning Division; Planning Commission

Funding Source: General Fund

Implementation Schedule: Brochure prepared by March 2023, after the 2022 building code adoption.

Expected Results: None quantified

### HI-17 SPECIAL NEEDS HOUSING

Provide incentives, such as a density bonus, expedited processing, relaxation of development standards, etc., to encourage development of housing for persons with special needs. Incentives will be identified in the brochure developed to promote affordable housing (HI-2) and will be codified where appropriate. In addition, the Town will work with the Far Northern Regional Center to implement an outreach program that informs families in Paradise on housing and services specifically available for persons with developmental disabilities. The program could include the development of an informational brochure, including information on services on the Town's website, and providing housing-related training for individuals/families through workshops.

The Town shall require that transitional and supportive housing is allowed in all zones allowing residential uses, in the same way other residential uses are allowed per state law (also see HI-16).

Responsible Party: Planning Division

Funding Source: General Fund

Funding: General Fund; Federal Housing Opportunities for Persons with AIDS, California Child Care Facilities Finance Program, and other state and federal programs designated specifically for special needs groups for efforts to address needs of those with developmental disabilities

Implementation Schedule: Development of outreach program within one year of adopting the Housing Element and annual meetings with Far Northern Regional Center thereafter for updates; prepare brochure by June 2023. Review Zoning Ordinance for consistency with the Employee Housing Act by December 2022.

Expected Results: None quantified

### HI-18 RESIDENTIAL CARE FACILITIES

As part of the Sewer Service Overlay zone proposed in HI-4, the Town will include provisions to allow State-licensed residential care facilities for seven or more persons only subject to those restrictions that apply to residential uses in the same zone to make it easier to locate these types of facilities and at the same time ensure that these facilities are located in areas with access to commercial services, near evacuation routes, and with adequate sewer capacity.

Responsible Party: Planning Division

Funding Source: General Fund, SB2 Grant Funding

Implementation Schedule: Amend Zoning Ordinance by September 2022.

Expected Results: None quantified

### HG-4 ENCOURAGE ENERGY-EFFICIENT RESOURCES IN NEW RESIDENTIAL DEVELOPMENT AS WELL AS IN THE EXISTING HOUSING STOCK.

HP-35 The Town will encourage energy efficiency and energy conservation in residential development to ensure sustainable practices and to reduce long-term housing costs.

### HI-19 ENERGY CONSERVATION AND EFFICIENCY

Promote energy efficiency and conservation in residential development by:

- Continuing to review the Town's land use regulations and subdivision ordinances and, where appropriate, amend to include provisions that promote and/or require energy conservation measures as a factor in project approval.
- Continuing to support inclusion of weatherization activities including, but not limited to, weatherization, siding, and dual-pane windows in the Housing Rehabilitation program.
- Continuing to support the SaveUEnergy program operated by Community Action Agency services, which provides free energy

audits and energy-saving services to low-income households and for a small fee to non-low-income households, by advertising the availability of this program in the Town's Housing Rehabilitation Program brochure.

Responsible Party: Community Development Department

Funding Source: General Fund

Implementation Schedule: Every two years review and revise codes as necessary

Expected Results: None quantified

### HG-5 AFFIRMATIVELY FURTHER FAIR HOUSING BY PROVIDING EQUAL HOUSING OPPORTUNITIES FOR ALL EXISTING AND FUTURE PARADISE RESIDENTS.

HP-36 The Town will enhance housing mobility strategies.

HP-37 The Town will encourage new housing choices and affordability in high resource areas and outside of areas of concentrated poverty

HP-38 The Town will improve place-based strategies to encourage community conservation and revitalization including preservation of existing affordable housing.

HP-39 The Town will protect existing residents from displacement.

### HI-20 UTILIZE ADUs TO PROVIDE AFFORDABLE HOUSING IN HIGHER OPPORTUNITY AREAS.

If being used as a rental, persons using the Town's mastered ADU plans would be required to affirmatively market their ADU to populations with disproportionate housing needs, including persons with disabilities and female-headed households. This would include sharing information with community organizations that serve these populations. The Town will also affirmatively market the mastered ADU plans to low-income households for wealth-building purposes.

Responsible Party: Housing Services Staff

Funding Source: General Fund

Implementation Schedule: Ongoing.

Expected Results: 12-15 ADUs created through the mastered ADU plans and 30-40 ADUs permitted during the Housing Element cycle

## 6. HOUSING GOALS, POLICIES, AND PROGRAMS

### HI-21 NON-ENFORCEMENT OF PRIVATE CC&RS.

Continue to disallow the governmental enforcement of private Covenants, Conditions, and Restrictions (CC&Rs) given their potential to cause areas of affluence and exclusion. Continue to allow all housing types (e.g., stick built, modular, manufactured) in all residentially zoned areas. Responsible Party: Housing Services Staff

Funding Source: General Fund

Implementation Schedule: Ongoing.

Expected Results: 350 manufactured homes permitted during the planning period in neighborhoods throughout the town.

### HI-22 AFFIRMATIVELY MARKET AFFORDABLE DEVELOPMENTS.

Require affordable housing developments be affirmatively marketed to households with disproportionate housing needs, including persons with disabilities and female-headed households. This would include sharing information with community organizations that serve these populations, such as legal service or public health providers. All marketing plans would include strategies to reach groups with disproportionate housing needs.

Responsible Party: Planning Staff

Funding Source: General Fund

Implementation Schedule: Ongoing. Marketing plans are submitted at time of building inspection.

Expected Results: Affordable housing projects and available affordable units are advertised to at least three community organizations.

### HI-23 ALLOW RESIDENTIAL CARE FACILITIES BY RIGHT.

Allow residential care facilities for seven or more person by-right in the sewer service area. This will make it easier to develop needed housing for special needs populations and ensure that these facilities are located in areas with access to commercial services, near evacuation routes, and with adequate sewer capacity.

Responsible Party: Planning Division

Funding Source: General Fund

Implementation Schedule: Amend Zoning Ordinance by 2025.

Expected Results: Development of 80 housing units for extremely- and very low-income households in the sewer service area.

### HI-24 FACILITATE DIVERSE HOUSING TYPES IN THE SEWER SERVICE AREA.

Utilize zoning tools to facilitate the construction of diverse housing types and a mix of uses within the sewer service area. This will increase access to opportunity by increasing the number of people who live in proximity to transit and services within the sewer service area. Encouraging mixed-income housing and diverse housing types will continue to facilitate integrated living patterns. Consistent with program HI-4, the Town could use changes to its fee structure and/or parking standard revisions to incentive active ground floor uses below residential units.

Responsible Party: Planning Division

Funding Source: General Fund

Implementation Schedule: June 2024 for mixed-use incentives and January 2025 for rezoning parcels with the Sewer Overlay Zone.

Expected Results: Development of 80 housing units for extremely- and very low-income households in the sewer service area.

### HI-25 UTILIZE AN EQUITY LENS IN UPCOMING PLANNING ACTIVITIES.

Utilize an equity lens in the upcoming General Plan update as well as the ongoing implementation of the Long-Term Community Recovery Plan. This includes ensuring an equitable community engagement process is implemented to capture feedback from historically excluded communities.

Responsible Party: Planning Division

Funding Source: General Fund

Implementation Schedule: Ongoing between 2023-2025 during the General Plan Update.

Expected Results: Participation amongst people of color and those in protected classes increases 10 percent from the first engagement activity to the last.

### HI-26 FUND MINOR HOME REPAIRS.

Continue to fund minor home repairs for income-eligible households through the owner-occupied rehab program. Work with FEMA to establish a grant program for home hardening retrofits.

Responsible Party: Housing Division

Funding Source: HOME Investment Partnerships Programs and/or CDBG

Implementation Schedule: Conduct publicity campaign for the program once annually in addition to hosting information on Town website.

Expected Results: Rehabilitation of 40 homes in target neighborhoods.

### HI-27 TARGETED ACCESSIBILITY UPGRADES.

Target accessibility upgrades in areas with greatest need. Implement the Transportation Master Plan (TMP) to prioritize intersection improvements where ADA upgrades are needed.

Responsible Party: Public Works Department

Funding Source: FEMA and FHWA

Implementation Schedule: During public road repaving project from August 2022 through 2025.

Expected Results: All intersections are ADA compliant.

### HI-28 ENHANCED HOME HARDENING PROGRAMS

Through partnerships with the Paradise Ridge and Butte County Fire Safe Councils explore home hardening programs that allow policyholders to lower their insurance rates through home hardening, vegetation management, or other risk reduction measures. Implement an equitable community engagement strategy and work with key stakeholders to identify Wildfire Risk Reduction Buffers to protect homes from the areas with greatest fire risk.

Responsible Party: Planning Division and Fire Department

Funding Source: General Fund and FEMA

Implementation Schedule: Meeting on Wildfire Risk Reduction Buffers by January 2023. Community engagement plan on Wildfire Risk Reduction Buffers by August 2023.

Expected Results: None quantified.

## CONCLUSION

The foregoing programs are considered appropriate and desirable to ensure that the Town's housing needs through 2030, as identified in Chapters 1 through 5, are met in a timely and cost-effective manner. The programs designate implementation schedules and expected results, including quantified objectives where applicable. Quantified objectives estimate the number of units likely to be constructed, rehabilitated, or preserved by income level during the planning period. The quantified objectives do not represent a ceiling on development and do not require the Town to construct these units, but rather set a target goal for the jurisdiction to achieve based on needs, resources, and constraints. Table 6-1 shows an estimate of quantified

objectives by income category for the number of units to be constructed, rehabilitated, and conserved over the planning period. Tables 6-2 and 6-3 identify the quantified objectives for individual programs. To achieve these objectives, the community will require developer and nonprofit participation and funding from the CDBG, HOME, and CalHOME programs as well as from other sources.

**TABLE 6-1: QUANTIFIED OBJECTIVES: CONSTRUCTION, REHABILITATION, AND PRESERVATION BY INCOME LEVEL**

Income Levels	Construction	Rehabilitation	Preservation
Extremely and Very Low	133	30	–
Low	483	25	–
Moderate	402	0	–
Above Moderate	2,002	0	–
<b>Total</b>	<b>3,020</b>	<b>55</b>	<b>–</b>

No at-risk units were identified, and therefore no preservation is required at this time. Construction of affordable units incentivized through HI-3, HI-4, and HI-8. Rehabilitation incentivized by HI-11. See Table 6-2 for more information. Source: Town of Paradise, 2021.

**TABLE 6-2: QUANTIFIED OBJECTIVES FOR VERY LOW- AND LOW-INCOME UNITS BY PROGRAM**

Program	Construction	Rehabilitation	Preservation
HI-2: Affordable Housing Resources	20	–	–
HI-3: Affordable Housing Incentives*	20	–	–
HI-4: Density Bonus, SSA Overlay, and Other Opportunities for Increased Density	447		
HI-8: Promote Second Units	40		
HI-11: Housing Rehabilitation and Improvement	–	16-40	–
<b>Total</b>	<b>527</b>	<b>16-40</b>	<b>–</b>

\* In Conjunction With HI-2.

Source: Town of Paradise, 2021.



## 6. HOUSING GOALS, POLICIES, AND PROGRAMS

**TABLE 6-3: QUANTIFIED OBJECTIVES FOR SPECIAL NEEDS UNITS  
BY PROGRAM**

<b>Program</b>	<b>Seniors/ Disabled</b>
HI-2 & HI-3: Affordable Housing Resources and Incentives	15
<b>Total</b>	<b>15</b>

Source: Town of Paradise, 2021.





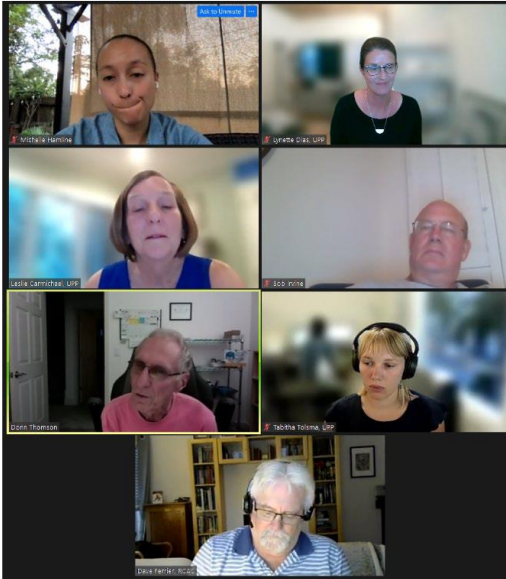
## CHAPTER 7 | COMMUNITY PARTICIPATION

This Housing Element has been shaped by community feedback throughout all phases of its development. A variety of in-person and digital tools were used to solicit input, including surveys, community meetings, and interviews. This chapter describes the community participation activities conducted during the development of the draft Housing Element and the adoption of the final Housing Element.

### DEVELOPMENT OF THE DRAFT HOUSING ELEMENT

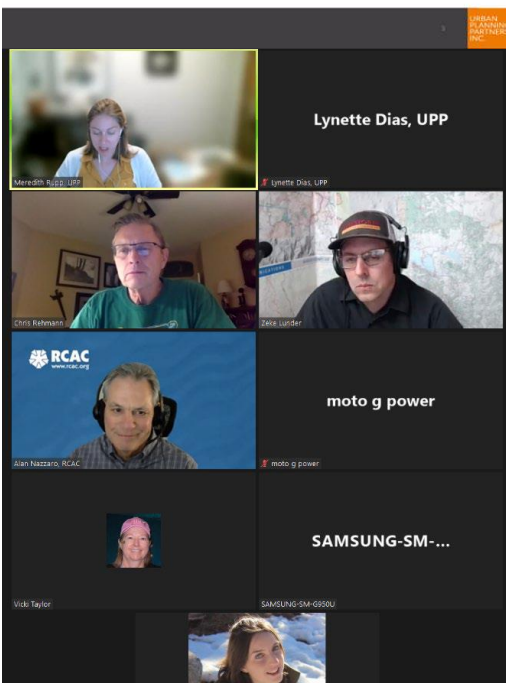
Given the ongoing recovery of the town and its residents, it was especially important to draw from prior planning efforts to avoid meeting fatigue and avoid duplicating efforts where appropriate. The Town adopted its Long-Term Community Recovery (LTCR) Plan in June 2019 and its 2020-2024 Consolidated Plan in July 2021. Both these efforts included robust community engagement, including seven listening sessions and community meetings held in conjunction with the LTCR Plan. The Housing Element drew from these prior plans and their community engagement results as a starting point.

Community engagement specific to the Housing Element update reached a wide range of stakeholders, including Town staff from other departments, residents, employees, housing advocates, wildfire experts, service agencies, and other organizations addressing housing and special needs. Key stakeholders, agencies, and organizations were contacted individually for input to ensure that the Housing Element accurately reflects a broad spectrum of the community and prioritizes needs appropriately. See Appendix E for more information on the public participation process. Engagement was carried out in three phases, as described below.



#### Questions

3. What do you see as best practice for managing and maintaining adequate defensible space in the town of Paradise?



### PHASE 1 – HOUSING ELEMENT INITIATION

The first phase of the engagement process sought to ensure stakeholders were aware of the Housing Element update and had the vocabulary and context needed to provide meaningful input throughout the update process. Community-based organizations (CBOs) were also consulted to identify the best methods to engage their members given the ongoing Camp Fire recovery and the Covid 19 pandemic.

#### WHAT WE HEARD – PHASE 1 HOUSING ELEMENT INITIATION

- Construction costs are a major barrier, and the Ridge was the affordable housing location for much of the area pre-fire.
- Outside organizations are plentiful and a good way to spread the word, especially since some people don't want to talk to the government after the draining rebuilding process.

### PHASE 2 – UNDERSTAND EXISTING CONDITIONS

In the second phase, the focus was on learning about current housing needs. In partnership with the Consolidated Plan update, a local census survey was mailed to every Paradise address and widely distributed online to gather data on demographics, housing conditions, and other variables to supplement U.S. Census Bureau data that did not reflect the post-fire

#### WHAT WE HEARD – PHASE 2 UNDERSTAND EXISTING CONDITIONS

- Septic is a major constraint. Increasing densities won't be possible until the sewer goes in.
- Obtaining insurance for new construction has been challenging, especially for multi-family housing.
- Market rate rents are sometimes equivalent to low-income (80% of median income) rents. Current construction costs can't pencil with the lower rents in Paradise.

reality. The local census was conducted with help from the Rural Community Assistance Corporation (RCAC) and garnered responses from 1,416 people.

In addition to the local census survey, five interviews with housing stakeholders, including affordable and market-rate developers, were conducted to understand constraints and opportunities for residential development. A Planning Commission study session was held to receive feedback on preliminary findings.

### PHASE 3 – TESTING SOLUTIONS

The final phase of engagement was used to formulate realistic and community-supported solutions to address housing challenges in the community. Working sessions with Town staff and stakeholders, a public meeting, and online survey were all part of this phase. A public meeting was held on September 21, 2021 and was widely publicized with approximately 40 flyers around town, email invitations to community organizations and other stakeholders, an ad in the Paradise Post, online press release, social media posts, and the Town's website.

In addition, the public review draft was widely publicized for public comment, included via emails to project followers and stakeholders and posted on the project website. The Public Review draft was made


#### WHAT WE HEARD – PHASE 3 TESTING SOLUTIONS

- There is support for three-story buildings in the sewer service area if coupled with high-quality landscaping and building design requirements.
- The community is in favor of creating greenspaces on parcels on the outskirts of town that played a large role in wildfire spread.



available for public comment for 30 days, consistent with Assembly Bill 215 requirements.

## What is a Housing Element?



The Housing Element is part of the Town's General Plan and lays out a blueprint for how the Town will meet its housing goals. It is an opportunity for community members and policy makers to address local housing challenges and find solutions. It contains detailed information on local housing needs, existing resources and constraints, and updated policies and programs to address those needs. In addition, the Housing Element identifies sites that are suitable for new housing.

**Why is Paradise updating its Housing Element?**

Under State law, each city, town, and county in California must update their Housing Element every eight years. The Housing Element must demonstrate how the jurisdiction will accommodate a certain number of dwelling units anticipated by the State (known as the Regional Housing Needs Allocation, or RHNA). The RHNA also stipulates how many units are needed at different affordability levels. The updated Housing Element must be approved by the California Department of Housing and Community Development (HCD). While the Housing Element must address specific state statutory requirements, it is ultimately a local plan and should reflect the vision and priorities of the community.

**What are the consequences of a non-updated Housing Element?**

Housing needs change over time; an updated Housing Element provides an accurate picture of housing-related issues and makes jurisdictions eligible for more funding resources. If the Housing Element is not updated and certified, jurisdictions may be fined or have limits imposed on their ability to make housing-related decisions.

**How does the Housing Element relate to Paradise's Long-Term Recovery?**

The State knows that Paradise is in recovery and has given the Town a RHNA that reflects this. Almost the entirety of Paradise's RHNA - 95 percent - is for rebuilding units that were lost in the Camp Fire. The Housing Element will also include goals, policies, and programs to help the town rebuild.

**Paradise's RHNA is 7,179 units (15% of units below market rate)**

**Key Features in a Housing Element**

- Goals, policies, objectives, and available resources or constraints to support existing and new housing across all income levels
- Analysis of special housing needs and existing affordable housing
- Inventory of sites suitable and available for new housing
- Strategies to affirmatively further fair housing

**2022 Paradise Housing Element Update Timeline**

## AFFIRMATIVELY FURTHERING FAIR HOUSING (AFFH)

Changes in Housing Element Law since the last cycle require the careful consideration of populations who have historically been excluded from planning processes and deliberate and proactive actions to remove barriers to participation. Consistent with HCD guidance, the following best practices were utilized to include public participation from all economic segments of the community.

- Consultations with CBOs to determine the methods, locations, messaging, and hours most conducive to engaging historically excluded communities, including low-income households and those with disabilities.
- Public meetings scheduled outside of working hours.

- Closed captioning provided at public meetings.
- In-person and remote meeting options with on-call tech support for those joining virtually.
- Robust and diverse meeting publicity implemented digitally and in person.
- Publication of a Housing Guide one pager (shown below) explaining terms in order to avoid jargon and make information more accessible.

## SUMMARY OF OUTREACH ACTIVITIES

This section summarizes key outreach activities. See Appendix E for more information.

### NEEDS ASSESSMENT

The 2021-2025 Consolidated Plan included a needs assessment that evaluated disproportionate housing needs. The plan was informed by feedback from local and regional stakeholders, such as the Housing Authority of Butte County, California Public Utilities Commission, Paradise Ridge Fire Safe Council, Butte County Public Health, and Butte County Continuum of Care. Citizen participation was solicited through the public comment period, public hearings, and stakeholder survey.

### STAKEHOLDER INTERVIEWS

See Table 7-1 for information on stakeholder interviews conducted as part of the Housing Element update.

### TOWN-WIDE COMMUNITY MEETING

The Town of Paradise, along with the Consultant team Urban Planning Partners, held a Community Engagement Meeting on September 21, 2021. The purpose of the meeting was to outline the Housing and Safety Element updates and to gain feedback from the community on potential policies. The meeting was held in a hybrid format. Town staff met in person at the Town hall with those who chose to participate in

## 7. COMMUNITY PARTICIPATION

person, while the remainder of attendees and facilitators met on Zoom. The brief presentation about the contents and goals of the Housing and Safety

**TABLE 7-1: STAKEHOLDER INTERVIEWS**

Organization	Interview Date	Interview Topic(s)
Civitas	April 8, 2021	Housing needs, engagement best practices
Harding Enterprises	April 26, 2021	Economic feasibility, residential development constraints
Jim Rickards	April 29, 2021	Economic feasibility, residential development constraints
Rebuild Paradise	May 3, 2021 & July 7, 2021	Housing needs and constraints, engagement best practices, economic feasibility
Hignell Companies	May 4, 2021	Economic feasibility, residential development constraints
Community Housing Improvement Program (CHIP)	May 7, 2021	Economic feasibility, residential development constraints
California Vocations	July 20, 2021	Engagement best practices, housing special needs
Deer Creek Resources	July 28, 2021	Wildfire prevention and adaption

Source: Urban Planning Partners, 2021.

Element update was followed by multiple breakout room discussions which covered topics surrounding housing density and availability, building materials and requirements, and wildfire resiliency. Following the discussion, groups reconvened to provide feedback on potential housing and resiliency policies, which related back to our discussions. Four community members attended the in-person meeting, and 11 more community members participated virtually.

## POLICY SURVEY

Following the Engagement meeting, a survey was publicized by the Town and distributed to community members and organizations, with the intent to reach more members of the community than were represented during the meeting. The questionnaire included a set of housing policies and a set of resiliency policies, the same policies which were presented during the meeting. Participants were asked to select any and all policies which they supported.

## STUDY SESSIONS AND PUBLIC HEARINGS

A Planning Commission study session was held on August 17, 2021 to present and receive feedback on housing needs identified to date and next steps engaging the community. Commissioners echoed that construction costs are a major constraint and were supportive of establishing an overlay zone in the sewer service area to accommodate higher densities while allowing flexibility.

The Public Review Draft Housing Element was available for public review and comment for over 30 days between December 4, 2021 and January 4, 2022. The availability of the draft Housing Element was publicized online and in the local newspaper. The Planning Commission received a presentation on the Public Review Draft Housing Element on January 13, 2022 and Town Council also had the opportunity to provide comments. Commissioners had questions about the source of some of the data used in the Housing Element and minor comments on typos. The public did not have any comments.

The Housing Element will be heard for adoption by the Planning Commission and Town Council at public hearings in Spring 2022.



# APPENDIX A: HOUSING NEEDS REPORT







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# 1 INTRODUCTION

In 2018, Paradise and some surrounding areas in Butte County faced one of the most destructive wildfires in California history, resulting 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. The number of people drawn to the region over the past 30 years had steadily increased year by year, but the fire caused an enormous housing shortage. The rebuild process is an integral part of this Housing Element to ensure that housing of various types and sizes is created for residents across all income levels, ages, and abilities to have a place to call home.

Required by the State, the Housing Element identifies what the existing housing conditions and community needs are, reiterates goals, and creates a plan for more housing. This report analyzes the housing needs, setting the stage for the development of goals and policies. An Excel Workbook ("Data Packet") accompanies this report. Figures in the report cite their corresponding tables in the Data Packet Workbook, which readers may consult for reference.



## 2 SUMMARY OF KEY FACTS

- **Population** – Generally, the population of Paradise had remained relatively constant, plus or minus 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 0.7 percent per year, which is about half as much growth as was expected for the County. However, the 2018 Camp Fire led to a population decrease of approximately 21,600 residents, leaving the Town with only 4,631 residents.
- **Age** – Respondents of the Town of Paradise Local Census Survey imply that the percentage of the population aged over 65 has increased significantly since the Camp Fire, while the proportion of all other age groups have decreased.
- **Race/Ethnicity** – Since 2000, the percentage of residents in Paradise identifying as White has decreased but remains the vast majority. The percentage of residents of all other races and ethnicities has *increased*, estimated to be 14 percent compared to about 9 percent in 2000. In absolute terms, the Hispanic or Latinx population increased the most, from 4 percent of the population in 2000 to an estimated 7 percent.
- **Employment** – Historically, the highest percentage of jobs in Paradise and Butte County have been in Health & Educational Services at 31 percent and 26 percent, respectively. Between 2002 and 2015, the number of jobs in Paradise increased by approximately 17 percent, and then dropped again by 7 percent between 2015 and 2018. After the 2018 Camp Fire, we expect that many jobs, especially related to the hospital, were lost or moved elsewhere in the County due to the destruction of the fire.
- **Number of Homes** – Paradise’s housing stock in 2015 was made up of 69 percent single family detached homes, 16 percent mobile homes, and 9 percent multifamily homes with 2 to 4 units. Until the Camp Fire, growth in each category had remained consistent. The Camp Fire led to significant decreases in all housing stock, but multi-family homes with 2 to 4 units saw the least percent change. In 2020, the housing stock consisted of 68 percent single family detached homes (-1 percent), 22 percent multifamily homes with 2 to 4 units (up 13 percent from pre-Fire), 8 percent multifamily homes with 5 or more units (up 5 percent from pre-Fire), 2 percent single family attached homes, and 1 percent mobile homes (which is the sharpest decline in percentage at -16 percent).
- **Home Prices** –The largest proportion of homes in Paradise are valued between \$250,000 and \$500,000. Since 2001, the typical home value in Paradise has increased 95 percent from \$155,433 to \$303,128.
- **Housing Type** – 87 percent of households in permanent “stick-built” homes are homeowners, while 90 percent of households in manufactured homes are homeowners, and a slightly lower 83 percent of those living in temporary housing structures are homeowners. This data is complicated by the fact that many households are waiting for their permanent homes to be rebuilt, so they are living in temporary shelter, but do own property in the Town.
- **Displacement** – The meaning of displacement has a unique definition in Paradise due to the widespread displacement of residents caused by the 2018 Camp Fire, which displaced 13,314 households. Of those who moved census tracts, 38 percent (2,148 households) were senior-led households. Low-income households represented 41 percent of households that relocated,



compared to 50 percent of households that stayed, indicating that lower-income households were less likely to move.

- **Special Housing Needs** – Some population groups may have special housing needs that require specific program responses, and these groups may experience barriers to accessing stable housing due to their specific housing circumstances. In Paradise, approximately 18 percent of people have a disability of any kind. Additionally, 17 percent of households with five or more people are very low-income, earning less than 50 percent of the area median income (AMI).

#### **Note on Data**

*The timing of the fire and the subsequent decline in population make collection of demographic and socioeconomic data challenging. Many of the sources typically used to assess housing needs have not collected data since the 2018 Camp Fire, which drastically changed the town's population and housing landscape; the three-year and five-year American Community Survey (ACS) data do not reflect impacts of the fire. To account for this, the Town of Paradise, in partnership with the Rural Community Assistance Corporation (RCAC), conducted a Local Census Survey in 2021. There were 1,415 respondents to the survey, which does not reflect the entire population living in Paradise. In addition, some survey respondents lived in Paradise prior to the 2018 Camp Fire, now live elsewhere, but wish to return if possible.*

*The information below primarily relies on the Town of Paradise Local Census Survey for 2021 data and ACS estimates for prior years. Additional sources referenced include the Butte County Association of Governments (BCAG), the US Department of Housing and Urban Development (HUD), various Town documents, interviews with community leaders, and other sources. Unless otherwise specified, the data in this report is specific to the Town of Paradise.*

#### **Note on Figures**

*Any figure that does not specify geography in the figure name represents data for the Town of Paradise.*

## 3 LOOKING TO THE FUTURE: REGIONAL HOUSING NEEDS

### 3.1 REGIONAL HOUSING NEEDS DETERMINATION

For the eight-year time frame covered by this Housing Element Update, the Department of Housing and Community Development (HCD) has identified the region's (Butte County's) housing need as 15,506 units: 6,703 units to accommodate regular growth and an additional 8,803 units to rebuild those lost in the 2018 Camp Fire. The total number of housing units assigned by HCD is separated into four income categories that cover housing types for all income levels, from very low-income households to market rate housing.<sup>1</sup> This calculation, known as the Regional Housing Needs Determination (RHND), is based on population projections produced by the California Department of Finance as well as adjustments that incorporate the region's existing housing need.

### 3.2 REGIONAL HOUSING NEEDS ALLOCATION

The Regional Housing Needs Allocation (RHNA) process is mandated by California law and requires all local jurisdictions to plan for their 'fair share' of housing units at all affordability levels. This Regional Housing Needs Plan (RHNP) is part of the Butte County Association of Governments' (BCAG) 6th Cycle RHNA, sometimes referred to as the "2020 update of the BCAG RHNP," covering the period from December 31, 2021, to June 15, 2030, and assigning housing need allocations to the Cities of Biggs, Chico, Gridley, Oroville, the Town of Paradise, and unincorporated Butte County.

State Housing Element Law requires BCAG to develop a methodology that calculates the number of housing units assigned to each city/town and the unincorporated portion of the county and distributes each jurisdiction's housing unit allocation among four affordability levels.

The fire rebuild allocation is unique to the region during the 6th Cycle RHNA process and stems from the November 2018 Camp Fire, which destroyed over 14,500 homes in the Town of Paradise and unincorporated Butte County. In 2020, just as this RHNP was being completed, the region experienced another deadly and destructive wildfire season, which included the North Complex Fire that destroyed more than 1,500 homes. These units are not accounted for in the current RHNA. For more information on the RHNA process this cycle, see BCAG's website: <http://www.bcag.org/Planning/Regional-Housing-Need-Plan/2020-Regional-Housing-Need-Plan/index.html>

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<sup>1</sup> HCD divides the RHND into the following four income categories:

Very Low-income: 0-50% of Area Median Income

Low-income: 50-80% of Area Median Income

Moderate-income: 80-120% of Area Median Income

Above Moderate-income: 120% or more of Area Median Income

In December 2020, The Town of Paradise received the following allocation of housing needs, broken down by income category as shown in Table 1:

**Table 1: Final Town of Paradise Allocation by Income Tier**

Income Group	Town of Paradise Units	Butte County Units	Town of Paradise Percent
Very Low Income (<50 percent of AMI)	383	2,081	5.3%
Low Income (50 percent-80 percent of AMI)	374	1,290	5.2%
Moderate Income (80 percent-120 percent of AMI)	1,319	3,202	18.4%
Above Moderate Income (>120 percent of AMI)	5,103	8,933	71.1%
<b>Total</b>	<b>7,179</b>	<b>15,506</b>	<b>100.0%</b>

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

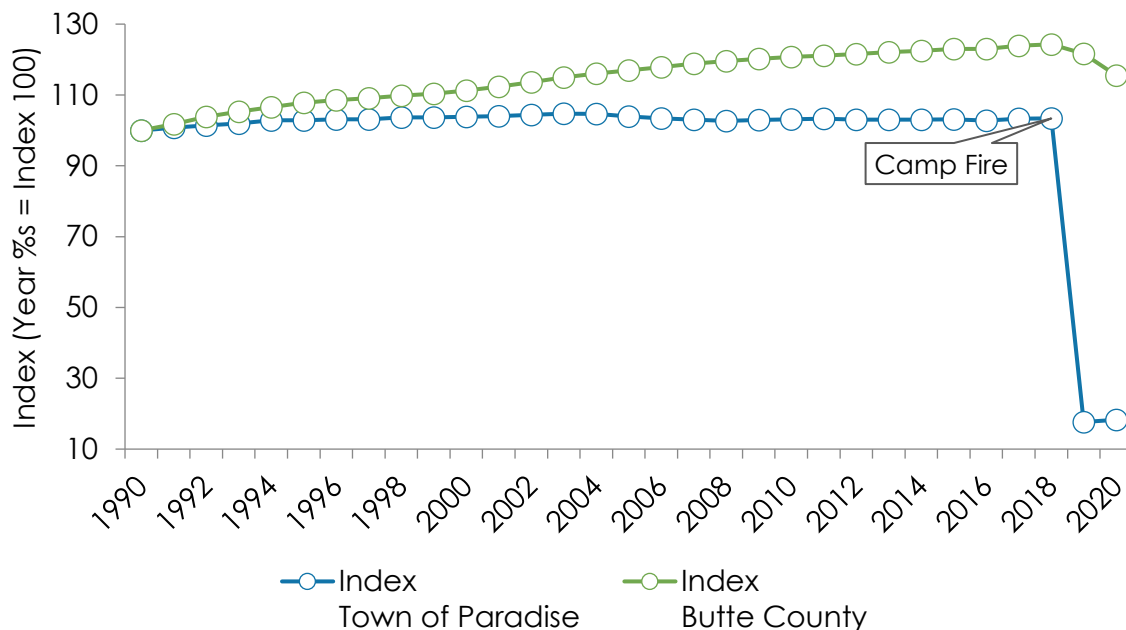
The timing of the fire and the subsequent decline in population make collection of demographic and socioeconomic data challenging. Many of the sources typically used to assess housing needs have not collected data since the 2018 Camp Fire, which drastically changed the town's population and housing landscape; the three-year and five-year American Community Survey (ACS) data do not reflect impacts of the fire. To account for this, the Town of Paradise, in partnership with the Rural Community Assistance Corporation (RCAC), conducted a Local Census Survey in 2021. There were 1,415 respondents to the survey, which does not reflect the entire population living in Paradise. In addition, some survey respondents lived in Paradise prior to the 2018 Camp Fire, now live elsewhere, but wish to return if possible.

The information below primarily relies on the Town of Paradise Local Census Survey for 2021 data and ACS estimates for prior years. Additional sources referenced include the Butte County Association of Governments (BCAG), the US Department of Housing and Urban Development (HUD), various Town documents, interviews with community leaders, and other sources. Unless otherwise specified, the data in this report is specific to the Town of Paradise.

## 4 POPULATION, EMPLOYMENT AND HOUSEHOLD CHARACTERISTICS

### 4.1 POPULATION

The population of Paradise has remained relatively constant, within a few hundred people, between 2000 and 2018. Based on population projections prepared by BCAG in their 2014-2040 Regional Growth Forecast, the Town was projected to reach a population of 29,547 by 2030, a growth rate of 0.7 percent per year. Paradise was expected to grow slower than the other five cities in the County and the unincorporated areas, about half as much as the County as a whole, which expected a 1.4 percent population increase per year. However, this all changed after the 2018 Camp Fire, which destroyed an estimated 95 percent of the town's structures and led to a population decrease of approximately 21,600 residents, or an 82 percent decrease according to the Camp Fire Regional Economic Impact Analysis (see Figure 1).



**Figure 1: Population Growth Trends, 1990-2020**

Source: California Department of Finance, E-4, E-5, and E-8 series Note: The data shown on the graph represents population for the jurisdiction and county indexed to the population in the first year shown. The data points represent the relative population growth in each of these geographies relative to their populations in that year.

DOF uses the decennial census to benchmark subsequent population estimates.

For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-01.

Before the Camp Fire, the population of Paradise made up 12 percent of Butte County with a population estimate of 26,256 in the beginning of 2018 (see Table 2). After the fire, the population estimate dropped to 4,485, only 2 percent of the County. This suggests that many previous Paradise residents have moved elsewhere in the County. For those residents that stayed in the region, inter-region population shifts found in the Camp Fire Regional Economic Impact Analysis indicate that affected residents relocated primarily to Chico and Oroville, or, to a lesser extent, to incorporated and unincorporated communities in Glenn and Tehama counties immediately following the Fire. The City of Chico incurred the greatest population increase of any jurisdiction in the region, gaining about 18,000 new residents, or a 20 percent increase in population.

**Table 2: Population Growth Trends**

Geography	2000	2005	2010	2015	2018	2019 (Post-Fire)	2020
Paradise	26,371	26,403	26,118	26,201	26,256	4,485	4,631
Butte County	202,658	212,955	219,967	223,940	226,374	221,521	210,291

Source: California Department of Finance, E-5 series and E-8 Series.

For more years of data, please refer to the Data Packet Workbook, Table POPEMP-01.

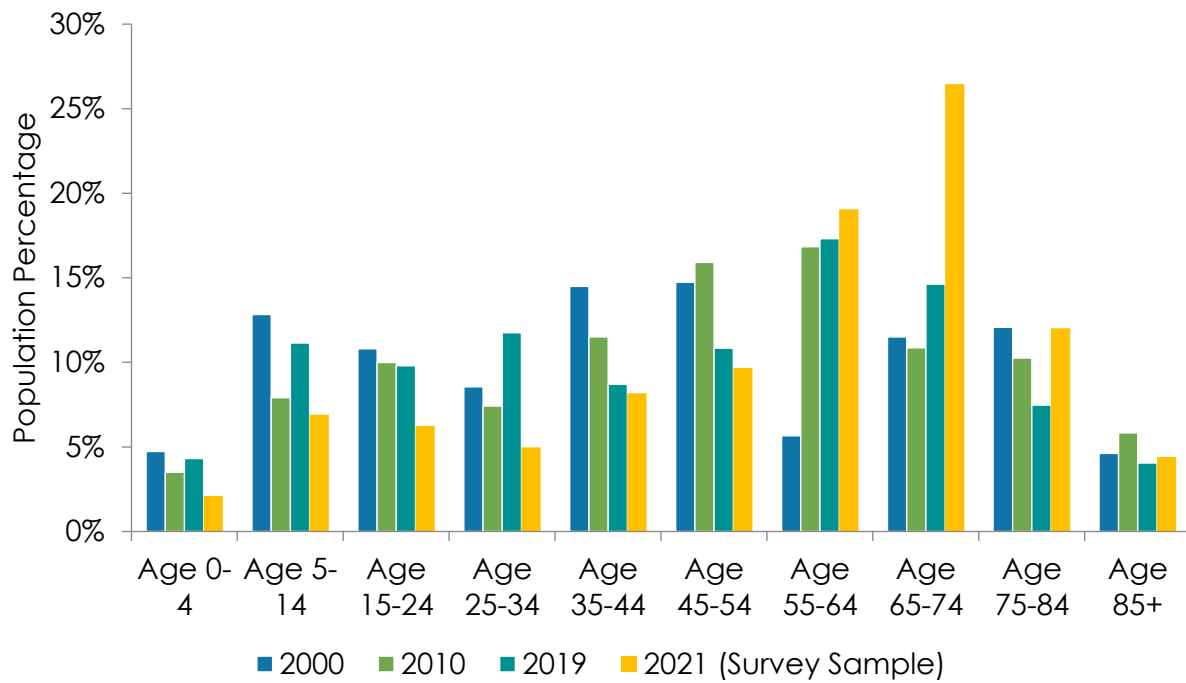
## 4.2 AGE

The distribution of age groups in a community shapes what types of housing it may need in the near future. An increase in the older population may mean there is a developing need for more senior housing options, while higher numbers of children and young families can point to the need for more family housing options and related services. There has also been a move by many to age-in-place or downsize to stay within their communities, which can mean more multi-family and accessible units are also needed.

In Paradise, respondents of the Town of Paradise Local Census Survey imply that the percentage of the population aged over 65 has increased significantly since the Camp Fire, while all other age groups have decreased (see Figure 2). However, it should be noted that it is possible that this age group was over-represented in the survey.

Looking at the senior and youth population by race can add an additional layer of understanding, as families and seniors of color are even more likely to experience challenges finding affordable housing. The 2021 Town of Paradise Local Census Survey shows that people of color<sup>2</sup> make up only 4 percent of seniors and 5 percent of youth under 18 (see Figure 3).

<sup>2</sup> Here, we count all non-White racial groups. Those who self-identified as “Hispanic or Latinx” may also be members of any racial group.

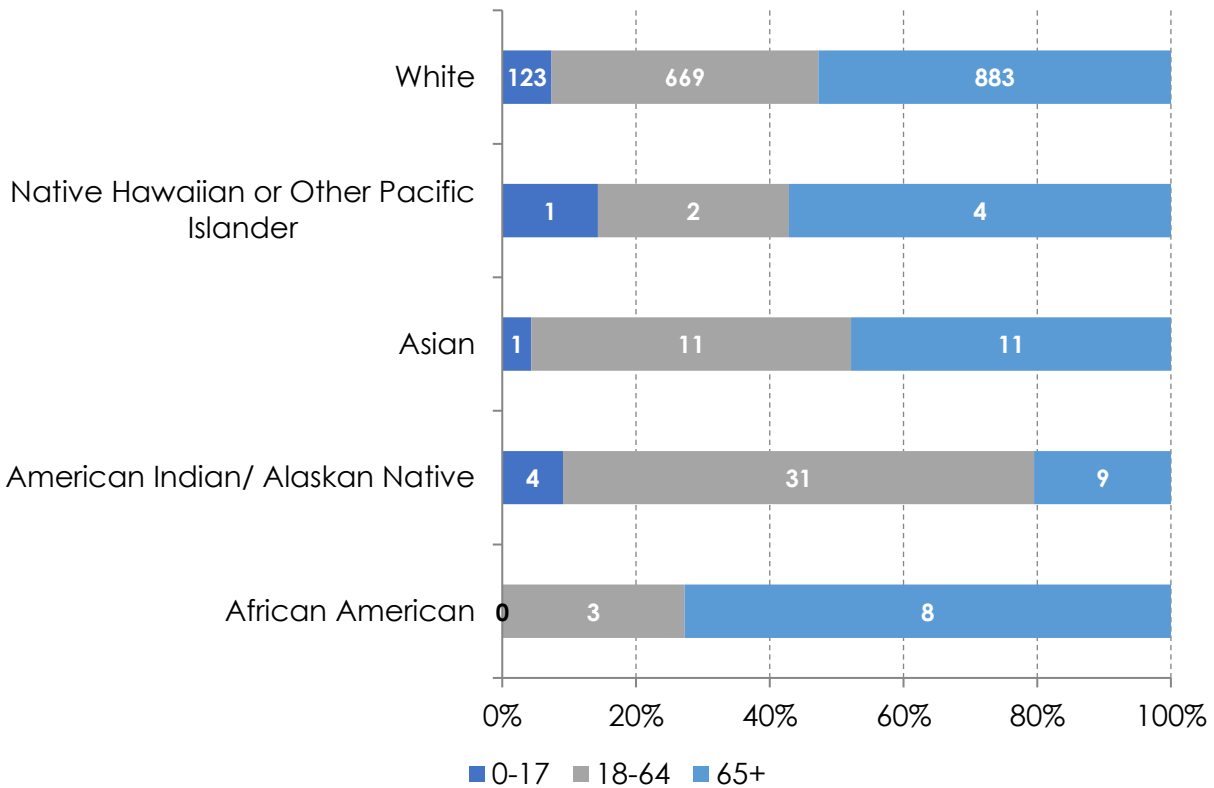


**Figure 2: Population by Age, 2000-2021**

*Universe: Total population*

*Source: U.S. Census Bureau, Census 2000 SF1, Table P12; U.S. Census Bureau, Census 2010 SF1, Table P12; U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B01001; Town of Paradise Local Census Survey 2021.*

*For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-04.*



**Figure 3: Senior and Youth Population by Race**

*Universe: Total population*

*Notes: For the purposes of this graph, the "Hispanic or Latinx" racial/ethnic group represents those who identify as having Hispanic/Latinx ethnicity and may also be members of any racial group. All racial categories on this graph represent those who identify with that racial category and may also identify with Hispanic/Latinx ethnicity. An overlapping category of Hispanic / non-Hispanic groups has not been shown in the graph to avoid double counting in the stacked bar chart.*

*Source: Town of Paradise Local Census Survey 2021.*

*For the data table behind this figure, please refer to the Data Packet Workbook, Table SEN-02.*

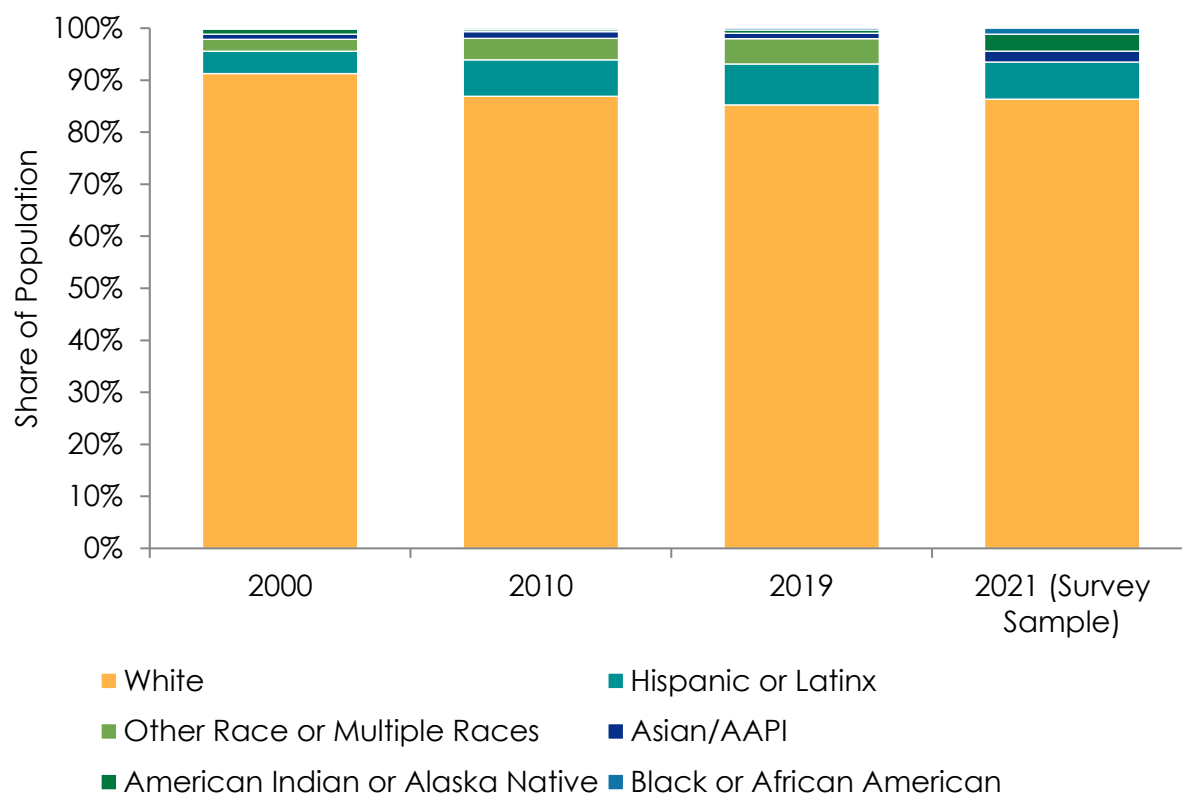
## 4.3 RACE AND ETHNICITY

Understanding the racial makeup of a community and region is important for designing and implementing effective housing policies and programs. These patterns are shaped by both market factors and government actions, such as exclusionary zoning, discriminatory lending practices and displacement that has occurred over time and continues to impact communities of color today.<sup>3</sup> Since 2000, the percentage of residents in Paradise identifying as White has decreased but remains the vast majority.

<sup>3</sup> See, for example, Rothstein, R. (2017). *The Color of Law: A Forgotten History of How Our Government Segregated America*. New York, NY & London, UK: Liveright Publishing.



The percentage of residents of all other races and ethnicities has *increased*, with the 2021 survey sample of all non-White racial categories standing at 14 percent compared to 9 percent in 2000 (see Figure 4). In absolute terms, the Hispanic or Latinx population increased the most, from 4 percent of the population in 2000 to an estimated 7 percent.



**Figure 4: Population by Race, 2000-2021**

Universe: Total population

Notes: Data for 2019 represents 2015-2019 ACS estimates. The Census Bureau defines Hispanic/Latinx ethnicity separate from racial categories. For the purposes of this graph, the "Hispanic or Latinx" racial/ethnic group represents those who identify as having Hispanic/Latinx ethnicity and may also be members of any racial group. All other racial categories on this graph represent those who identify with that racial category and do not identify with Hispanic/Latinx ethnicity.

Source: U.S. Census Bureau, Census 2000, Table P004; U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B03002; Town of Paradise Local Census Survey 2021.

For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-02.

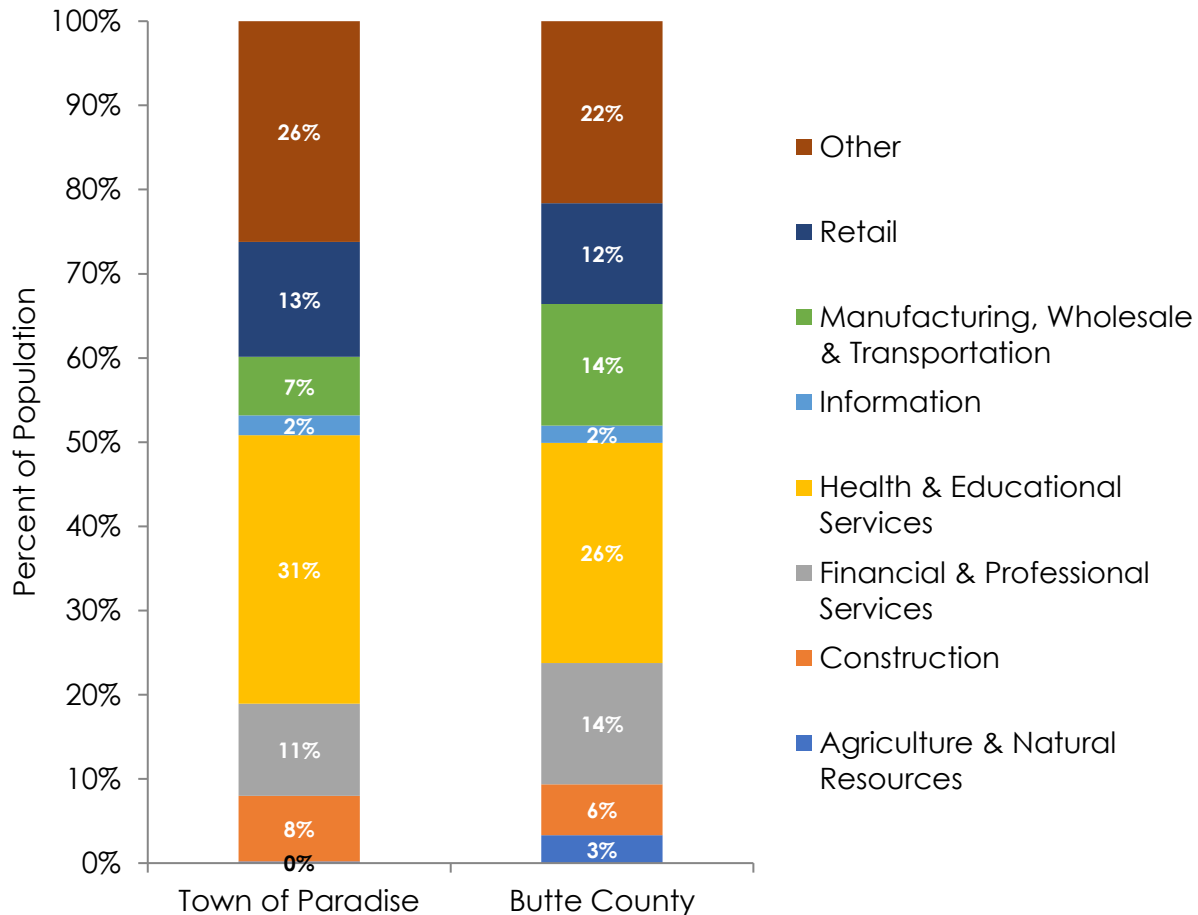
## 4.4 EMPLOYMENT TRENDS

### 4.4.1 BALANCE OF JOBS AND WORKERS

A city or town houses employed residents who either work in the community where they live or work elsewhere in the region. Conversely, a city or town may have job sites that employ residents from the same city or town, but more often employ workers commuting from outside of it. Smaller towns typically have more employed residents than jobs there and export workers (while larger cities tend to have a surplus of jobs and import workers).

## APPENDIX A

The last Census Data, collected prior to the 2018 Camp Fire, can give us some indication of the employment trends in Paradise and surrounding areas. Historically, the highest percentage of jobs in Paradise and Butte County have been in Health & Educational Services at 31 percent and 26 percent, respectively (see Figure 5).



**Figure 5: Resident Employment by Industry – Pre-Fire**

Universe: Total population

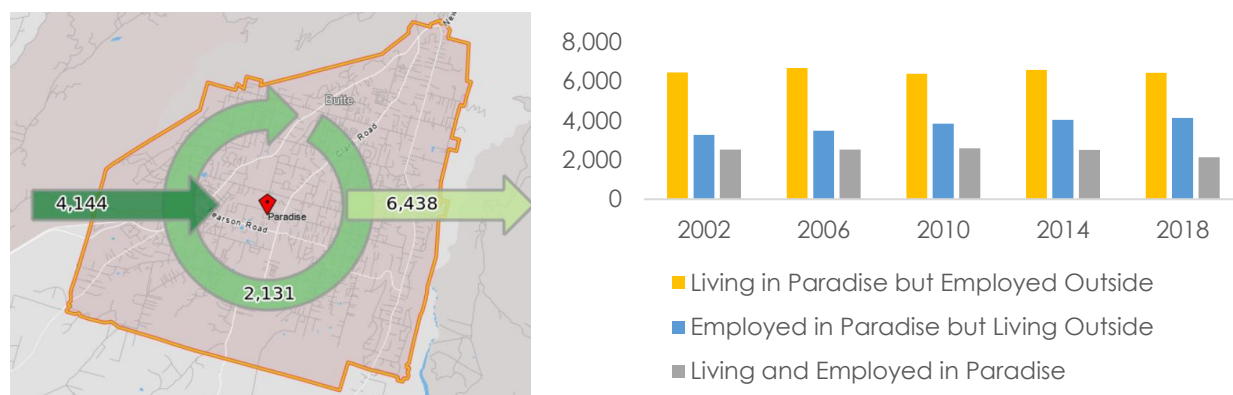
Notes: The data displayed shows the industries in which jurisdiction residents work, regardless of the location where those residents are employed (whether within the jurisdiction or not). Categories are derived from the following source tables: Agriculture & Natural Resources: C24030\_003E, C24030\_030E; Construction: C24030\_006E, C24030\_033E; Manufacturing, Wholesale & Transportation: C24030\_007E, C24030\_034E, C24030\_008E, C24030\_035E, C24030\_010E, C24030\_037E; Retail: C24030\_009E, C24030\_036E; Information: C24030\_013E, C24030\_040E; Financial & Professional Services: C24030\_014E, C24030\_041E, C24030\_017E, C24030\_044E; Health & Educational Services: C24030\_021E, C24030\_024E, C24030\_048E, C24030\_051E; Other: C24030\_027E, C24030\_054E, C24030\_028E, C24030\_055E.

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table C24030.

For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-04.

In some areas in California, the housing affordability crisis has illustrated that imbalances between the local jobs and worker populations can get out of sync. One measure of this is the relationship between *workers* and *jobs*. A city or town with a surplus of workers “exports” workers to other parts of the region, while a city or town with a surplus of jobs must conversely “import” them. Prior to the 2018 Camp Fire, Paradise consistently had more residents living in Paradise and working outside of the town from 2002

to 2018 and a comparatively low amount of people employed in Paradise but living outside (see Figure 6). Therefore, many residents of Paradise likely work elsewhere in Butte County or the surrounding area.



**Figure 6: Labor Force and Employment Efficiency**

*Notes: The data is tabulated by place of work, regardless of where a worker lives. The source data is provided at the census block level. These are cross walked to jurisdictions and summarized.*

*Source: U.S. Census Bureau, Longitudinal Employer-Household Dynamics, Workplace Area Characteristics (WAC) files, 2002-2018.*

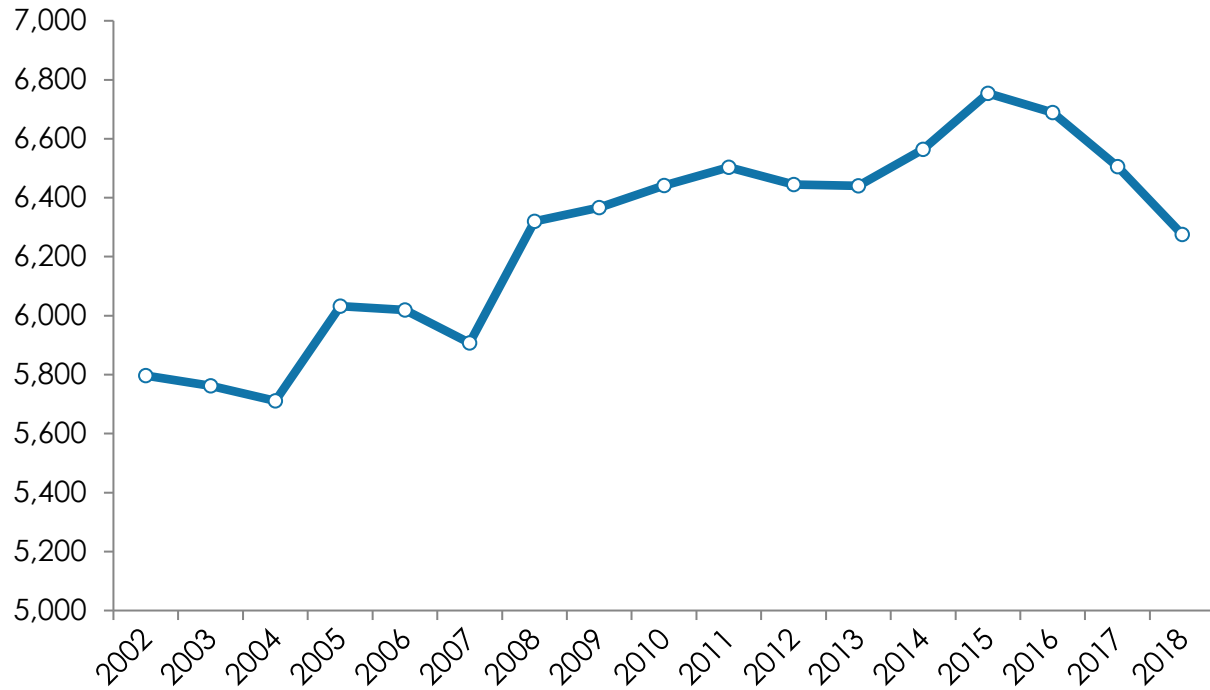
*For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-10.*

Between 2002 and 2015, the number of jobs in Paradise increased by 17 percent, and then dropped again by 7 percent between 2015 and 2018 (see Figure 7). After the 2018 Camp Fire, we expect that many jobs, especially related to Feather River Hospital, were lost or moved elsewhere in the County due to the destruction of the fire.

Census estimations from just before the 2018 Camp Fire demonstrate that the concentration of jobs in Paradise were in the East near the now-closed Feather River Hospital (see Image 1). Feather River Hospital was previously the leading employer in Paradise. Over 1,000 part-time and full-time employees were laid off following the immediate closure. After the fire, employees were transferred to nearby clinics in Chico and Marysville or were offered a job with Adventist Medical if they were willing to relocate.<sup>4</sup>

<sup>4</sup> George, K. (2019) "Feather River hospital to close, over 1,200 employees to be laid off" The Orion, Chico CA, <https://theorion.com/78106/news/feather-river-hospital-to-close-over-1200-employees-to-be-laid-off/>

## APPENDIX A

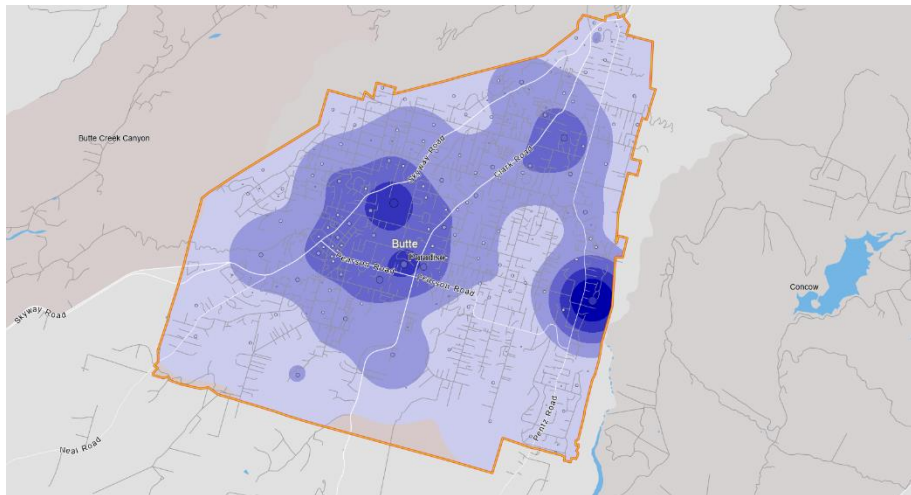


**Figure 7: Jobs in a Jurisdiction**

*Notes: The data is tabulated by place of work, regardless of where a worker lives. The source data is provided at the census block level. These are crosswalked to jurisdictions and summarized.*

*Source: U.S. Census Bureau, Longitudinal Employer-Household Dynamics, Workplace Area Characteristics (WAC) files, 2002-2018.*

*For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-10.*

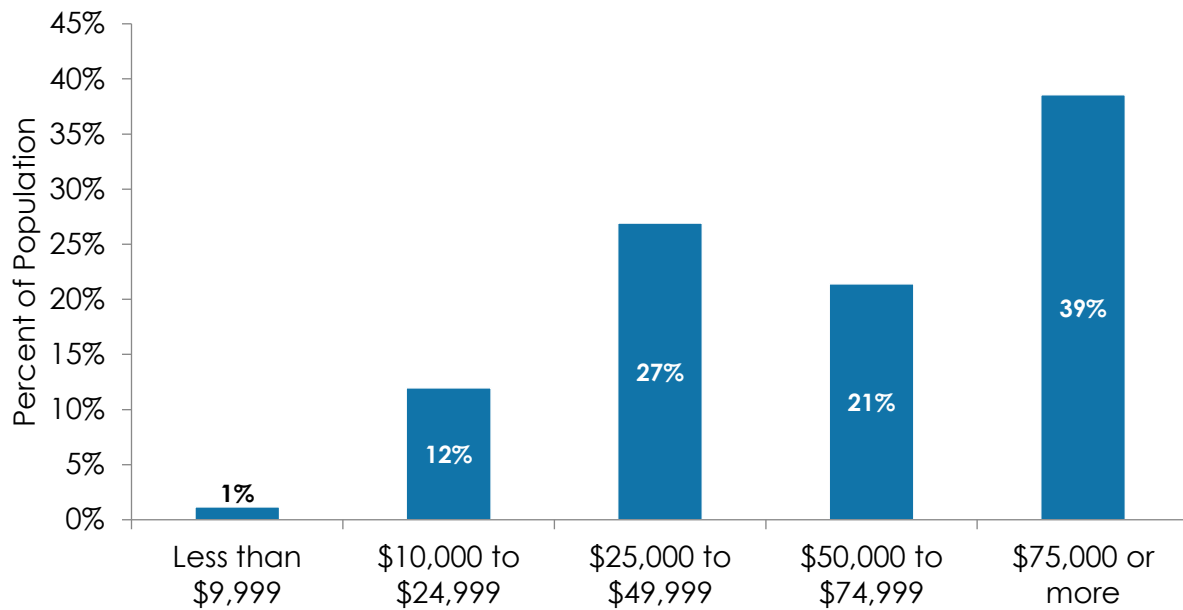


**Image 1: Jobs Concentration – Pre-Fire**

*Source: U.S. Census Bureau On The Map Work Area Profile Analysis, 2018.*

*For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-10.*

Figure 8, from the Town of Paradise Local Census Survey of 2021, shows a breakdown of different wage groups, offering additional insight into local dynamics since the fire.<sup>5</sup>



**Figure 8: Household Income**

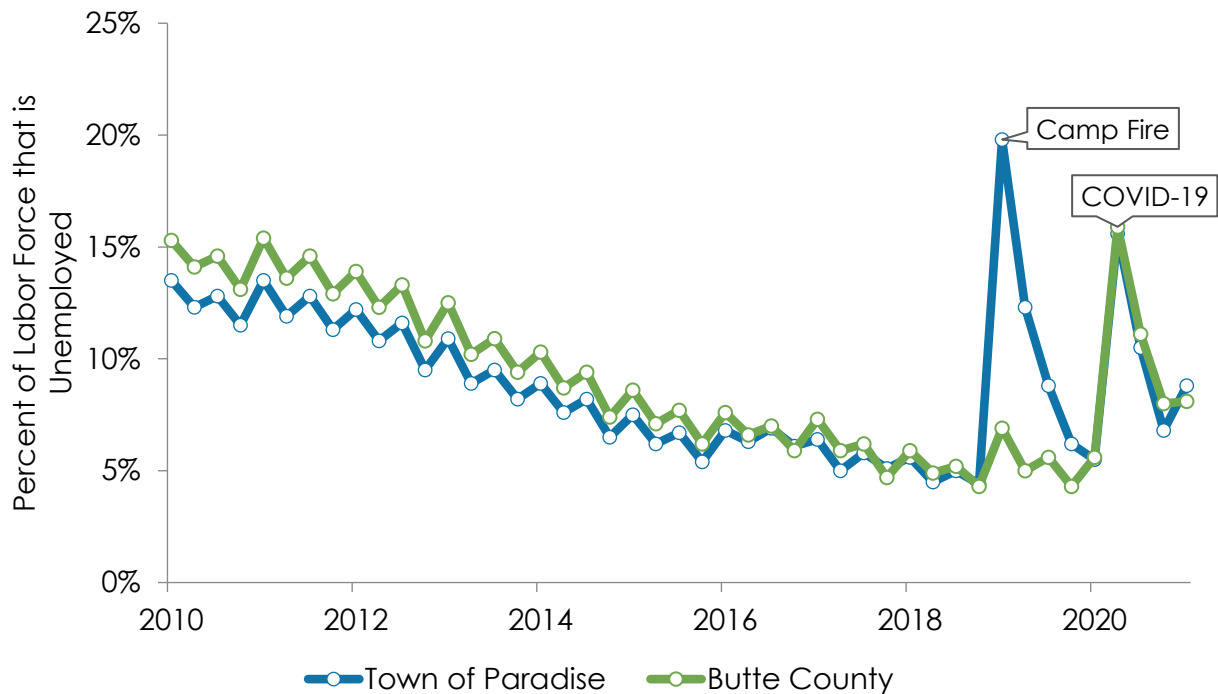
Source: Town of Paradise Local Census Survey 2021.

For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-10.

<sup>5</sup> The source table is top coded at \$75,000, precluding more fine grained analysis at the higher end of the wage spectrum.

#### 4.4.2 UNEMPLOYMENT

In Paradise, there was a nearly 5 percentage point decrease in the unemployment rate between January 2010 and January 2021. The Town experienced a sharp rise in unemployment in 2018 due to the Camp Fire, and again in 2020 due to impacts related to the COVID-19 pandemic, though the Town saw general improvement and recovery in the months following both downturns (see Figure 9).



**Figure 9: Unemployment Rate, 2010-2021**

*Universe: Civilian noninstitutional population ages 16 and older*

*Notes: Unemployment rates for the jurisdiction level is derived from larger-geography estimates. This method assumes that the rates of change in employment and unemployment are exactly the same in each sub-county area as at the county level. If this assumption is not true for a specific sub-county area, then the estimates for that area may not be representative of the current economic conditions. Since this assumption is untested, caution should be employed when using these data. Only not seasonally adjusted labor force (unemployment rates) data are developed for cities and CDPs.*

*Source: California Employment Development Department, Local Area Unemployment Statistics (LAUS), Sub-county areas monthly updates, 2010-2021.*

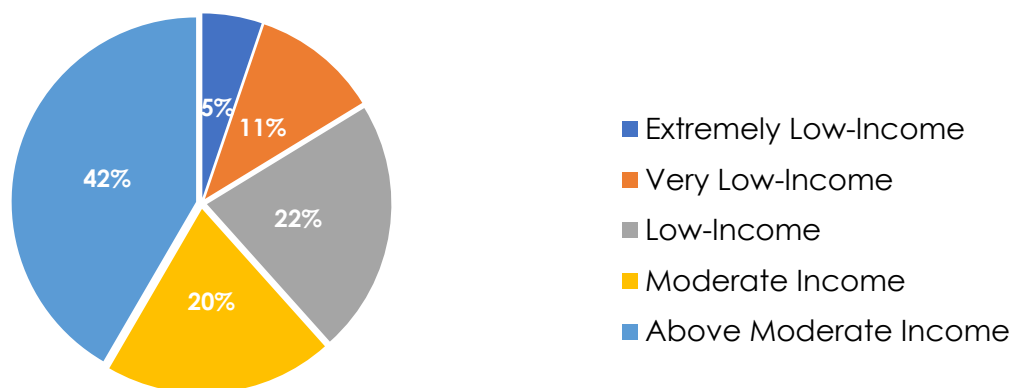
*For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-15.*

### 4.5 HOUSEHOLD CHARACTERISTICS

The majority of households who took the Town of Paradise Local Census of 2021 – 62 percent – are considered moderate income or above moderate income, compared to 5 percent who reported extremely low incomes (see Figure 10).

Regionally, in Butte County, pre-fire data from 2017 show that 14 percent of households were considered extremely-low income (i.e., households that earn less than 30 percent AMI). In Butte County in 2021, 30 percent AMI is the equivalent to the annual income of \$26,500 for a family of four. Many

households with multiple wage earners – including food service workers, full-time students, teachers, farmworkers, and healthcare professionals – can fall into lower AMI categories due to relatively stagnant wages in many industries. People living on fixed income like seniors or those with disabilities also often fall into lower AMI categories.



**Figure 10: Households by Household Income Level**

*Universe: Households who took the Town of Paradise 2021 Local Census Survey*

*Notes: Income groups are based on HUD calculations for Area Median Income (AMI). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located.*

*Source: U.S. Department of Housing and Urban Development (HUD), Town of Paradise 2021 Local Census Survey.*

*For the data table behind this figure, please refer to the Data Packet Workbook, Table ELI-01.*

Because of the possibility of sample bias in the Town of Paradise Local Census of 2021, for the purposes of estimating the projected number of extremely low-income households, we are following HCD's guidance to assume that 50 percent of the Town of Paradise's very low-income RHNA is for extremely low-income households. According to the data shown below (Table 3), 383 units are allocated for very low-income households, or 5 percent of the total RHNA. Extremely low-income households are then estimated to represent 50 percent of this allocation, which is equivalent to 192 extremely low-income households, or approximately 3 percent of the population.<sup>6</sup>

<sup>6</sup> Local jurisdictions are required to provide an estimate for their projected extremely low-income households in their Housing Elements. HCD's official Housing Element guidance notes that jurisdictions can use their RHNA for very low-income households (those making 0-50 percent AMI) to calculate their projected extremely low-income households. For more information, visit HCD's Building Blocks page on Extremely Low-Income Housing Needs.



Table 3: Occupied Housing Units by Income Level

Income Group	Town of Paradise Units	Butte County Units	Town of Paradise Percent
Very Low Income (<50% of AMI)	383	2,081	5.3%
Low Income (50%-80% of AMI)	374	1,290	5.2%
Moderate Income (80%-120% of AMI)	1,319	3,202	18.4%
Above Moderate Income (>120% of AMI)	5,103	8,933	71.1%
<b>Total</b>	<b>7,179</b>	<b>15,506</b>	<b>100.0%</b>

Universe: Occupied housing units

Source: U.S. Department of Housing and Urban Development (HUD).

Throughout the region, there are disparities between the incomes of homeowners and renters. In Paradise, the largest proportion of renters falls in the *Low-Income* group, while the largest proportion of homeowners are found in the *Above Moderate Income* group (see Figure 11).

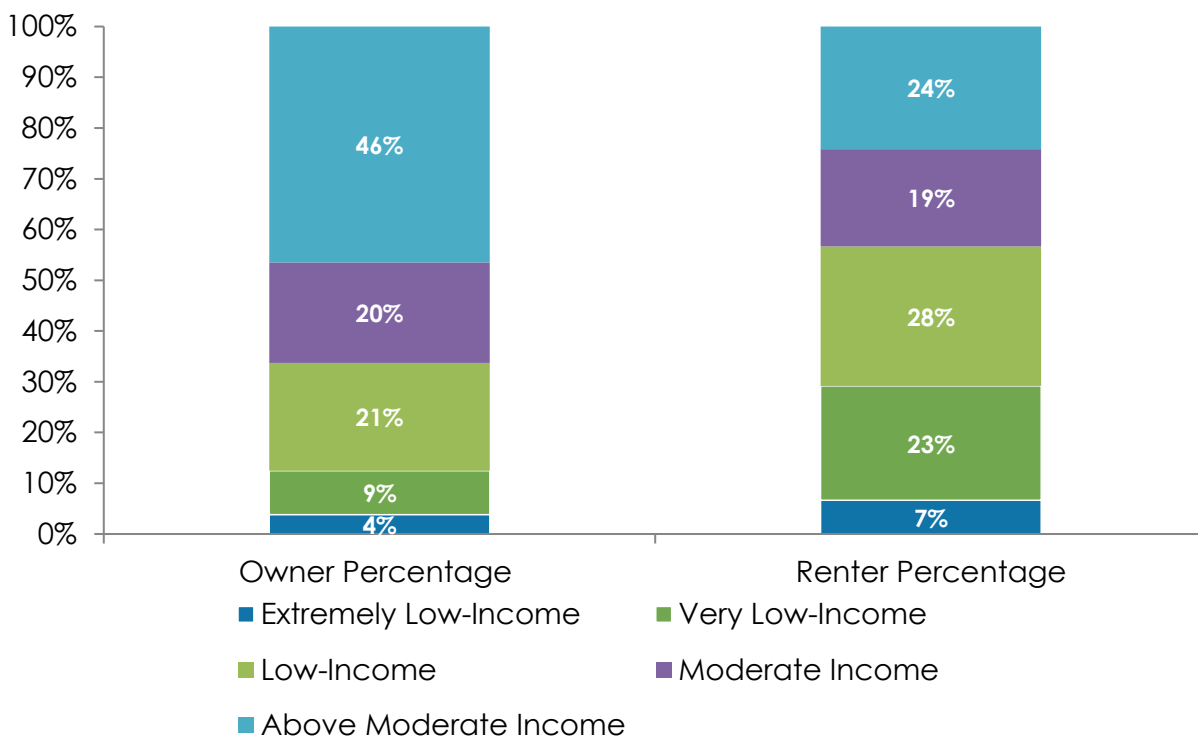


Figure 11: Household Income Level by Tenure

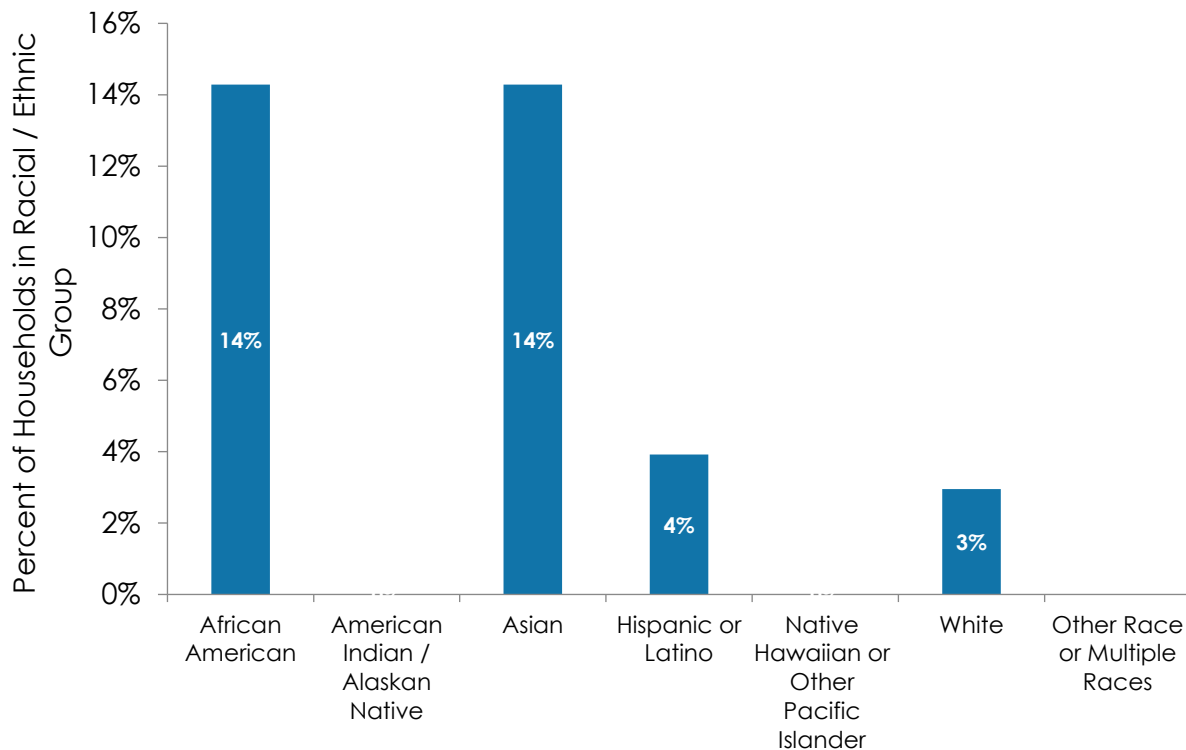
Universe: Occupied housing units

Notes: Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different areas. The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located.

Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release, Town of Paradise Local Census Survey 2021.

For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-17.

Currently, people of color are more likely to experience poverty and financial instability as a result of federal and local housing policies that have historically excluded them from the same opportunities extended to white residents.<sup>7</sup> These economic disparities also leave communities of color at higher risk for housing insecurity, displacement, or homelessness. In Paradise, African American and Asian (both Hispanic and Non-Hispanic) residents experience the highest rates of poverty, followed by Hispanic or Latino residents (see Figure 12). Compared to the Population Percentage by Race in Figure 4, White (Hispanic and Non-Hispanic) are underrepresented in the population with poverty status and all other racial groups, except Hispanic or Latinx, are overrepresented. However, these projections are based on the Town of Paradise 2021 Local Census Survey, which was only able to capture data for seven African American households and fourteen Asian households. Figure 13 shows the Census Data that was captured prior to the 2018 Camp Fire, for comparison.



**Figure 12: Poverty Status by Race, 2021 Local Census**

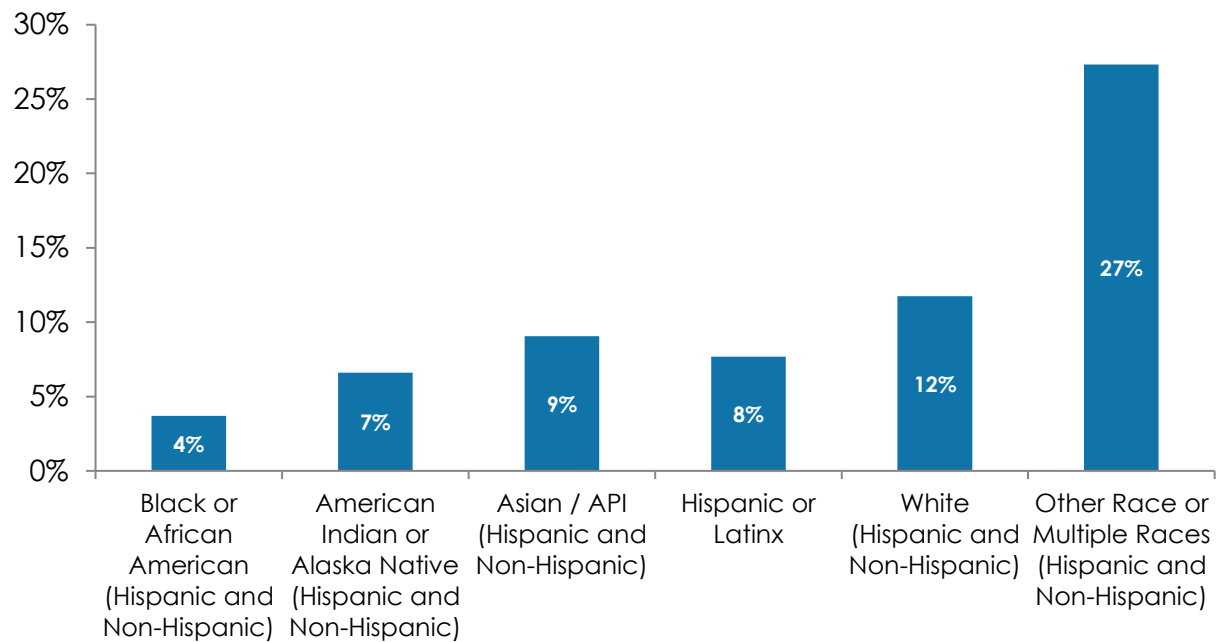
*Universe: Population for whom poverty status is determined*

*Notes: This chart uses a federally defined poverty threshold that remains constant throughout the country and does not correspond to Area Median Income. -The racial/ethnic groups reported in this table are not all mutually exclusive. Therefore, the data should not be summed as the sum exceeds the population for whom poverty status is determined for this jurisdiction.*

*Source: Town of Paradise 2021 Local Census Survey.*

*For the data table behind this figure, please refer to the Data Packet Workbook, Table ELI-03.*

<sup>7</sup> Solomon, D., Maxwell, C., and Castro, A., 2019. Systemic Inequality: Displacement, Exclusion, and Segregation: How America's Housing System Undermines Wealth Building in Communities of Color. *Center for American Progress*.



**Figure 13: Poverty Status by Race, Pre-Fire**

*Universe: Population for whom poverty status is determined*

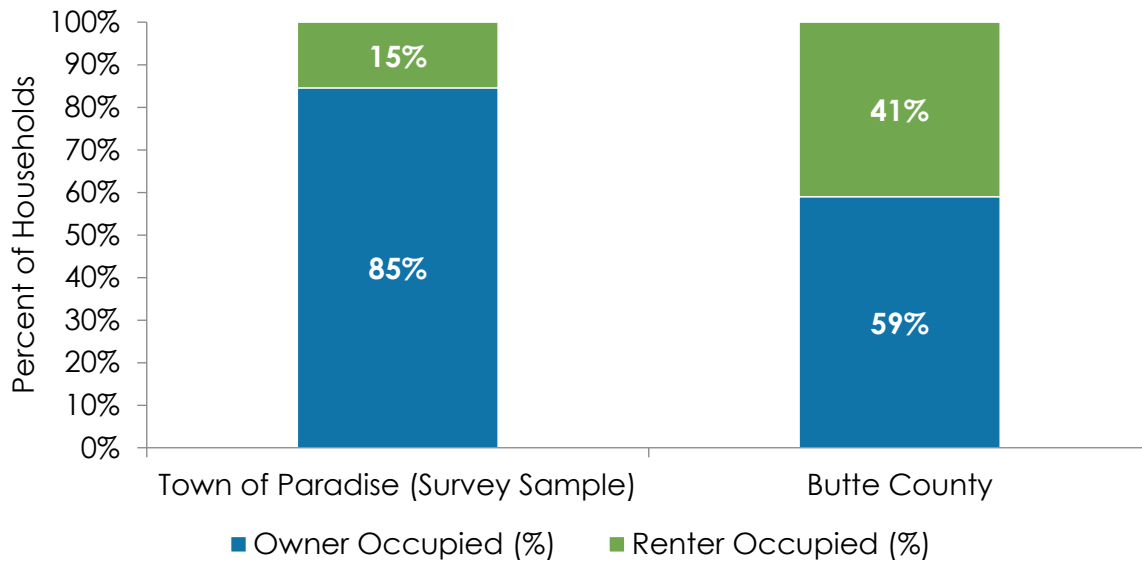
*Notes: -The Census Bureau uses a federally defined poverty threshold that remains constant throughout the country and does not correspond to Area Median Income. -For this table, the Census Bureau does not disaggregate racial groups by Hispanic/Latinx ethnicity. The racial/ethnic groups reported in this figure are not all mutually exclusive. Therefore, the data should not be summed as the sum exceeds the population for whom poverty status is determined for this jurisdiction. However, all groups labelled "Hispanic and Non-Hispanic" are mutually exclusive, and the sum of the data for these groups is equivalent to the population for whom poverty status is determined.*

*Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B17001(A-I).*

*For the data table behind this figure, please refer to the Data Packet Workbook, Table ELI-03.*

## 4.6 TENURE

The number of residents who own their homes compared to those who rent their homes can help identify the level of housing insecurity – ability for individuals to stay in their homes – in a city and region. Generally, renters may be displaced more quickly if prices increase or during regional natural disasters. In Paradise, fewer residents rent than own their homes: approximately 15 percent versus 85 percent (see Figure 14). By comparison, 41 percent of households in Butte County are renters, while 59 percent of households own their homes.



**Figure 14: Housing Tenure**

*Universe: Occupied housing units*

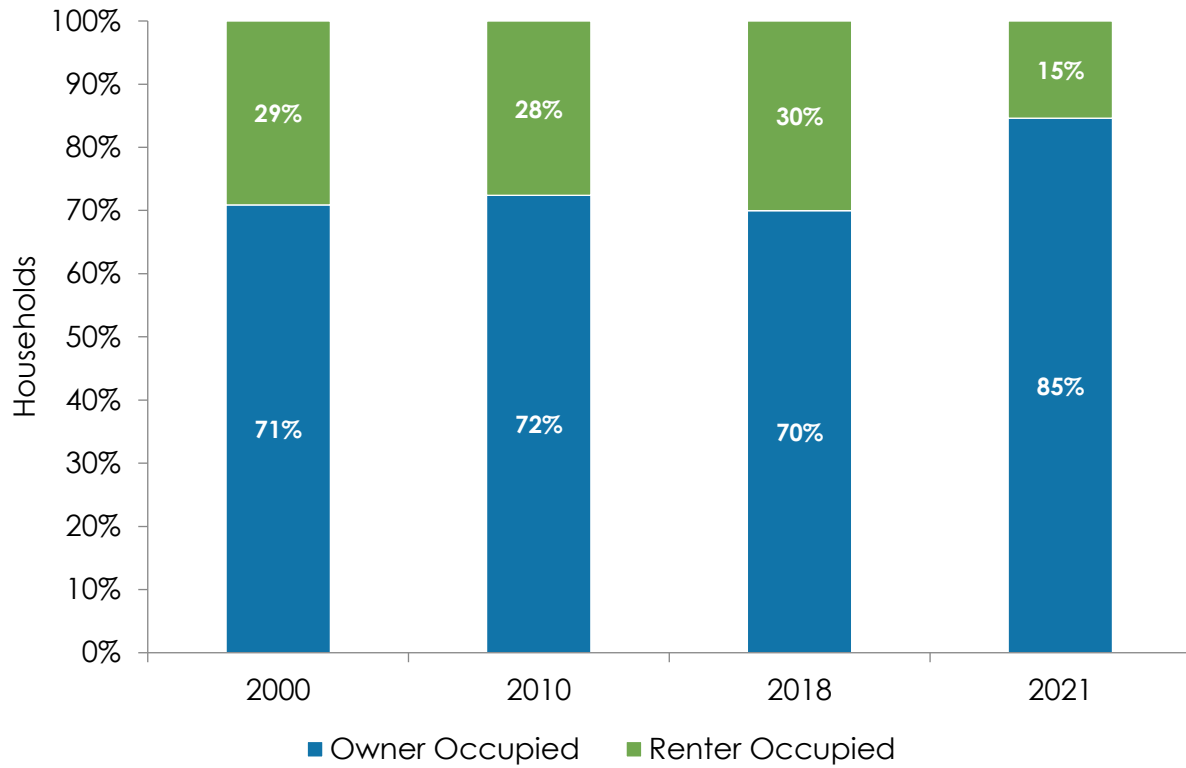
*Source: Town of Paradise Local Census Survey 2021, U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25003. For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-13.*

The 2018 Camp Fire appears to have displaced more renters than homeowners, although the survey sample could be biased towards homeowners. According to Census data, before the fire, homeowners consistently made up over 70 percent of the population since 2000, a large difference from the post-fire survey sample of which 85 percent of respondents owned their homes (see Figure 15).

Disparities in homeownership rates not only reflect differences in income and wealth but also stem from federal, State, and local policies that limited access to homeownership for communities of color while facilitating homebuying for white residents. While many of these policies, such as redlining, have been formally disbanded, the impacts of race-based policy are still evident across California communities.<sup>8</sup> In Paradise, 100 percent of the seven Black households who took the Town of Paradise Local Census Survey of 2021 owned their homes, while 75 percent of Asian households, 76 percent of Hispanic or Latino households, and 86 percent of White households who took the survey did (see

<sup>8</sup> See, for example, Rothstein, R. (2017). *The Color of Law: A Forgotten History of How Our Government Segregated America*. New York, NY & London, UK: Liveright Publishing.

Figure 16). Notably, recent changes to State law require local jurisdictions to examine these dynamics and other fair housing issues when updating their Housing Elements.

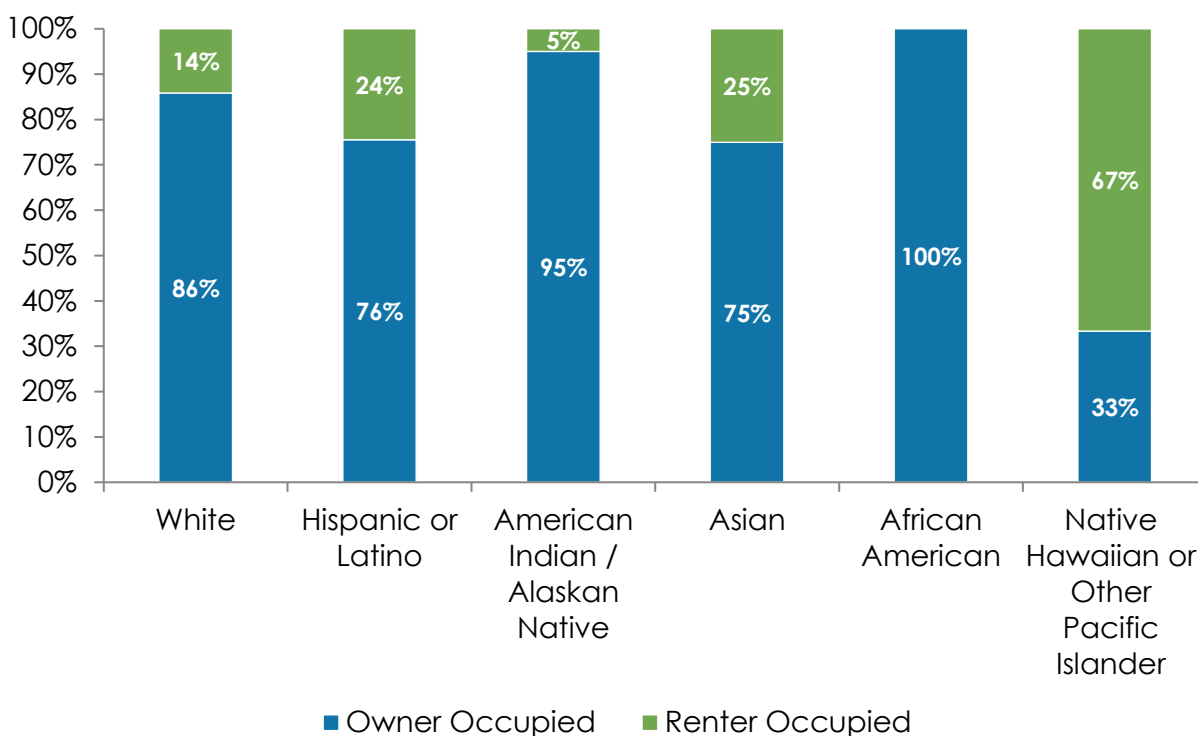


**Figure 15: Housing Tenure 2000-2021**

*Universe: Occupied housing units*

*Source: American Community Survey 5-Year Data (2015-2019), Table B25003 and H004; Town of Paradise Local Census Survey 2021.*

*For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-18.*



**Figure 16: Housing Tenure by Race of Householder**

*Universe: Occupied housing units*

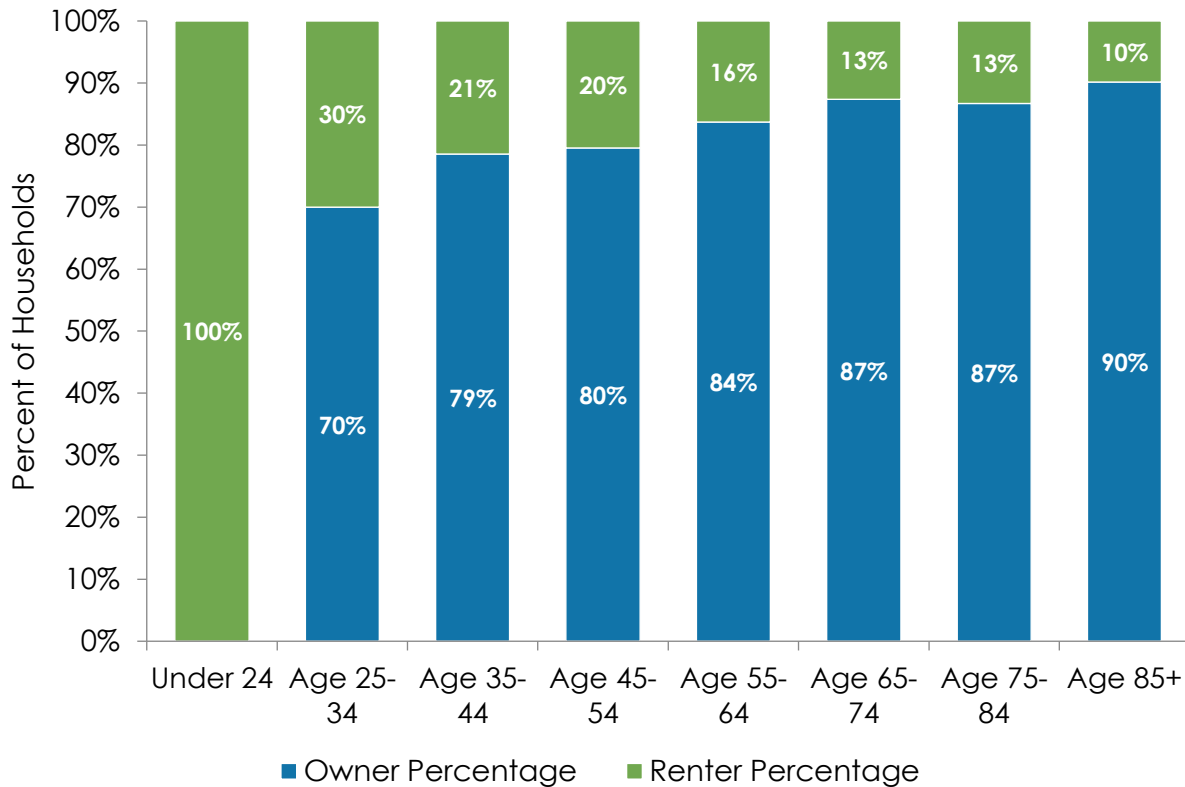
*Notes: For this table, the Town of Paradise Local Census Survey did not disaggregate racial groups by Hispanic/Latinx ethnicity, so the racial/ethnic groups reported in this table are not all mutually exclusive. Therefore, the data should not be summed as the sum exceeds the total number of occupied housing units for this jurisdiction.*

*Source: Town of Paradise Local Census Survey 2021,*

*For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-16.*

The age of residents who rent or own their home can also signal the housing challenges a community is experiencing. Younger households tend to rent and may struggle to buy a first home due to high housing costs. At the same time, senior homeowners seeking to downsize may have limited options.

In Paradise, 76 percent of householders between the ages of 25 and 44 are owners, while 88 percent of householders are over 65 (see Figure 17).



**Figure 17: Housing Tenure by Age**

*Universe: Occupied housing units*

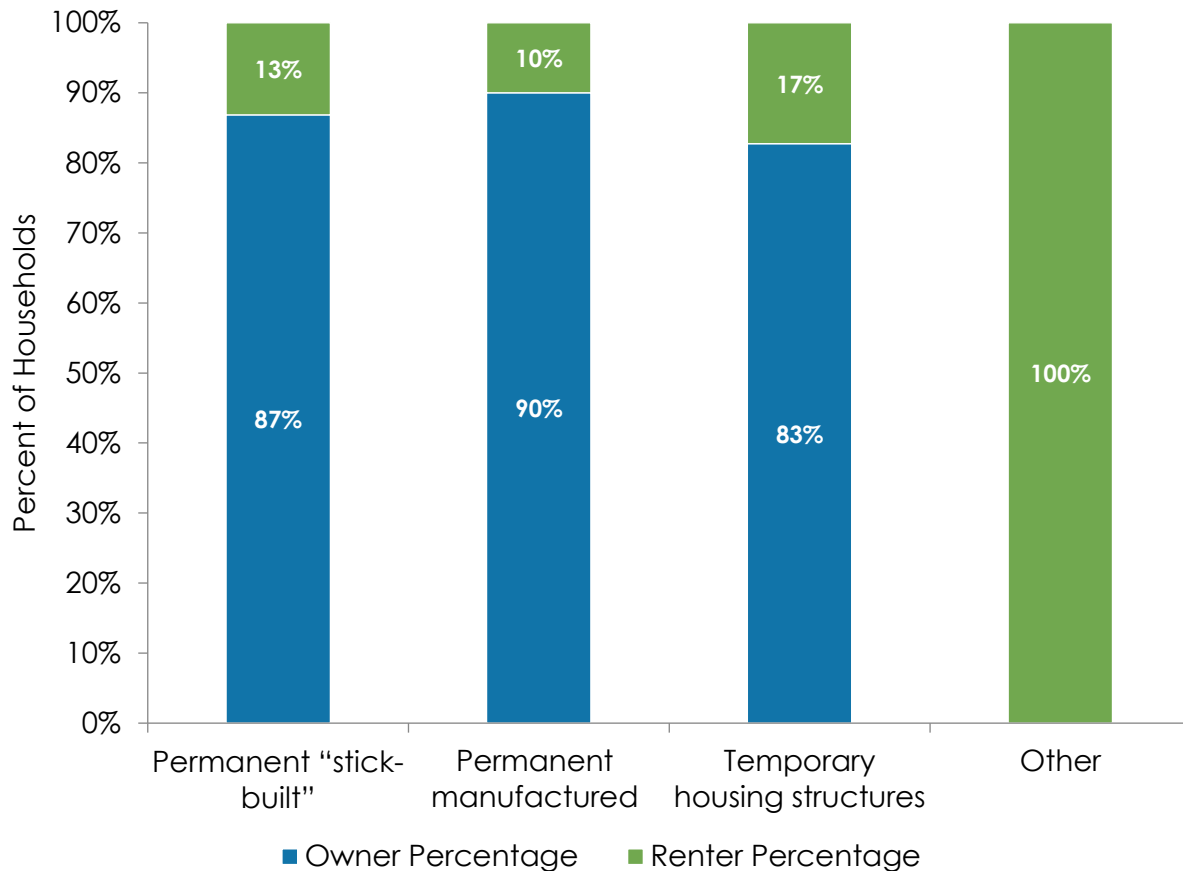
*Note: This data is counting the head of household.*

*Source: Town of Paradise Local Census Survey 2021,*

*For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-14.*

In many cities, homeownership rates for households in single-family homes are substantially higher than the rates for households in multi-family housing. While we do not have data that was collected after the 2018 Camp Fire, the Town of Paradise Local Census Survey of 2021 did ask residents about permanent “stick-built” (built on-site regardless of materials used) versus permanent manufactured (built entirely at plant and placed on site) and temporary housing structures like recreational vehicles, tiny houses, or other temporary arrangements. In Paradise, 87 percent of households in permanent “stick-built” homes are homeowners, while 90 percent of households in manufactured homes are homeowners, and a slightly lower 83 percent of those living in temporary housing structures are homeowners (see Figure 18). This data is complicated by the fact that many households are waiting for their permanent homes to be rebuilt, so they are living in temporary shelter but do own property in the town.





**Figure 18: Housing Tenure by Housing Type**

Universe: Occupied housing units

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25032.

For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-18.

## 4.7 DISPLACEMENT

Whereas much of California faces displacement due to increasing housing prices, the situation in Paradise is unique because displacement took on a new meaning after the 2018 Camp Fire when most residents lost a home, place of work, and/or the same sense of community with such a large population loss. When individuals or families are forced to leave their homes and communities, they also lose their support network. Displacement has the most severe impacts on low- and moderate-income residents who had less savings to fall back on during the crisis.

A report written by Next 10 and UC Berkeley's Center for Community Innovation, *Rebuilding for a Resilient Recovery: Planning in California's Wildland Urban Interface*, included Paradise as a case study and revealed important information on who was most affected by the fire:

- Before the fire, Paradise had a large population of retirees — 35 percent of residents were over 60 years old, and 7 percent were over 80 years old. Nearly 85 percent of those who perished in

the fire were over the age of 60, pointing to the vulnerability of older residents, particularly those with disabilities and those who are more socially isolated.

- The Camp Fire displaced 13,314 households, and of those, 43 percent (5,679 households) had moved to a new census tract by 2019. Of those who moved census tracts, 38 percent (2,148 households) were senior-led households. Low-income households represented 41 percent of households that relocated, compared to 50 percent of households that stayed, indicating that lower-income households were less likely to move.
- While 34 percent of all households affected by the 2018 Camp Fire were renters, 40 percent of households that moved were renters. The average household income of households that moved was \$54,153, higher than \$49,974 for the households that did not move.

The report also revealed that most of those displaced from Paradise lived in their homes for generations and were more likely to live in a single-family home and own their home than else in California. Before the Camp Fire, approximately 70 percent of residents owned their homes, higher than the 55 percent homeownership rate statewide. The median home value of \$218,400 was nearly half the average home value in California, which is \$475,900. The lower incomes of the residents of Paradise (\$49,270), when compared to the average Californian (\$71,228) imply that many lived in Paradise due to the relatively lower housing costs, and with the high levels of destruction, low-income families may choose to permanently move out of the state in search of cheaper housing options elsewhere.

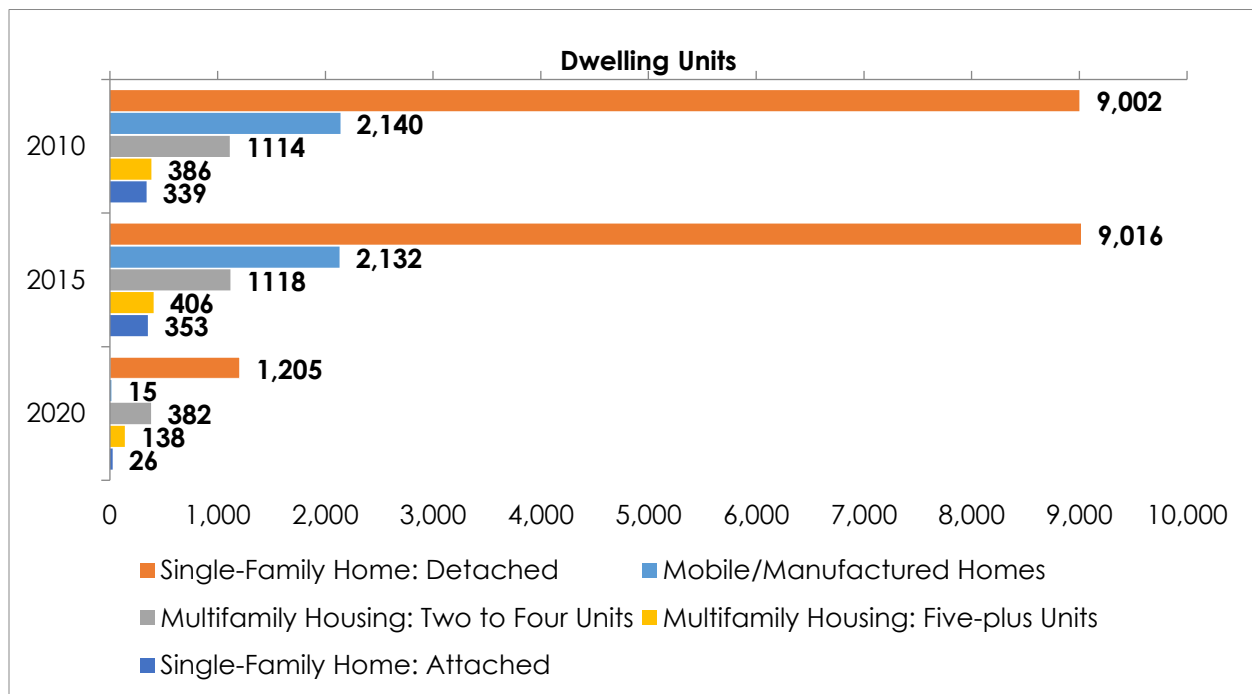
These findings suggest that lower-income residents may not have the resources to relocate as easily as their higher-income peers, especially lower-income homeowners. Renters, seniors, and low-income households are special populations to consider when designing policies and programs to address displacement.

## 5 HOUSING STOCK CHARACTERISTICS

### 5.1 HOUSING TYPES, YEAR BUILT, VACANCY, AND PERMITS

Before the 2018 Camp Fire, the California Department of Finance estimates there were 13,091 dwelling units, but only 1,720 as of January 1, 2019. Of the 375 apartment buildings before the fire, only 94 survived and can still be used, or 105 multi-family units of the previous 853. None of the 347 mobile homes survived according to Urban Footprint data.

In recent years, most housing produced in the region and across the state consisted of single-family detached homes. Paradise's housing stock in 2015 was made up of 69 percent single-family detached homes, 16 percent mobile homes, and 9 percent multifamily homes with 2 to 4 units (see Figure 19). Until the Camp Fire, growth in each category had remained consistent. The Camp Fire led to significant decreases in all housing stock, but multi-family homes with 2 to 4 units saw the least percent change. In 2020, the housing stock consisted of a similar 68 percent single-family detached homes, 22 percent multifamily homes with 2 to 4 units (up 13 percent from pre-Fire), 8 percent multifamily homes with five or more units (up 5 percent from pre-Fire), 2 percent single-family attached homes, and 1 percent mobile homes (which is the sharpest decline in percentage at -16 percent).



**Figure 19: Housing Type Trends**

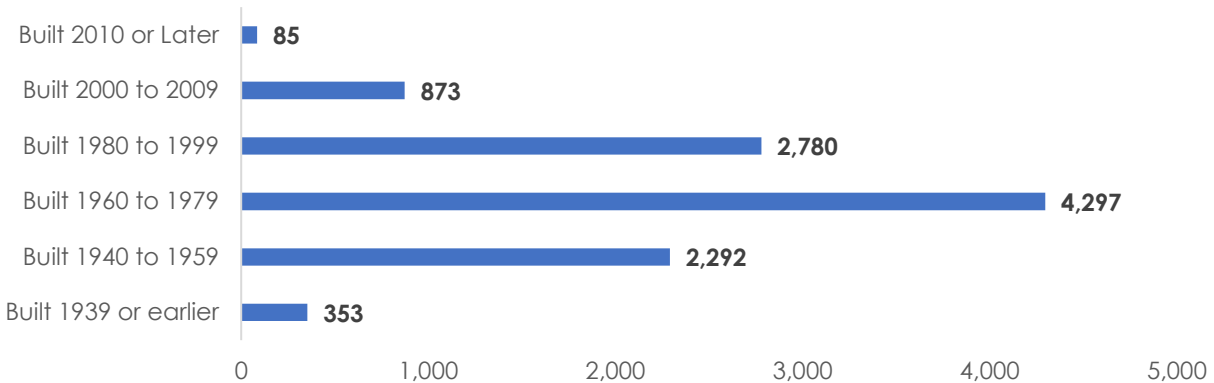
Universe: Housing units

Source: California Department of Finance, E-5 series.

For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-01.

## APPENDIX A

The most recent Census data do not accurately represent the post-Camp Fire conditions in Paradise, but the estimates and historical data tell us that the largest proportion of the housing stock before the fire was built between 1960 and 1979, with 4,297 units constructed during this period (see Figure 20). Since 2000 but before the fire, 9 percent of the housing stock was built (958 units).<sup>9</sup>



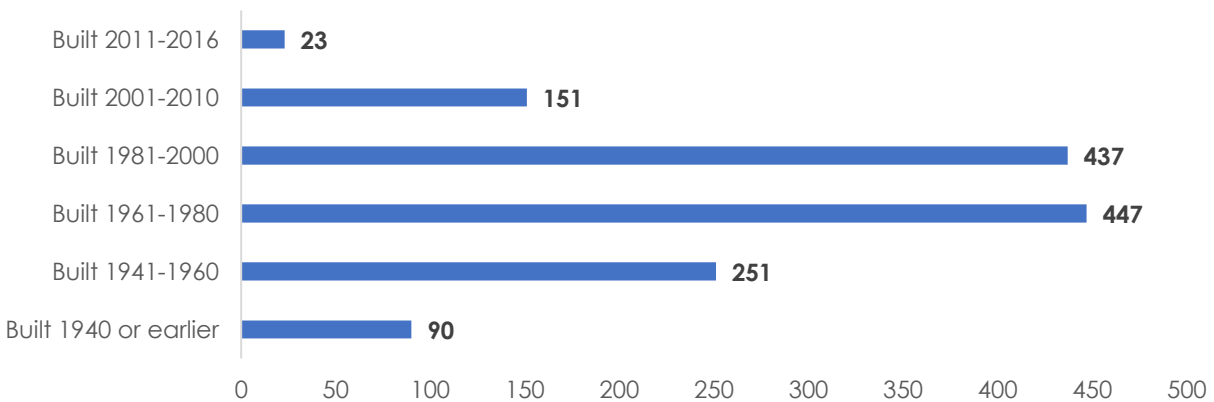
**Figure 20: Housing Units by Year Structure Built, Pre-Fire**

Universe: Housing units

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25034.

For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-09.

Data from CoreLogic available through Urban Footprint tell us that the largest proportion of the housing stock remaining after the fire was built between 1961 and 2000, with 884 units (or 63 percent) of the remaining 1,399 units being built in this recent period (see Figure 21).



**Figure 21: Housing Units by Year Structure Built, Post-Fire**

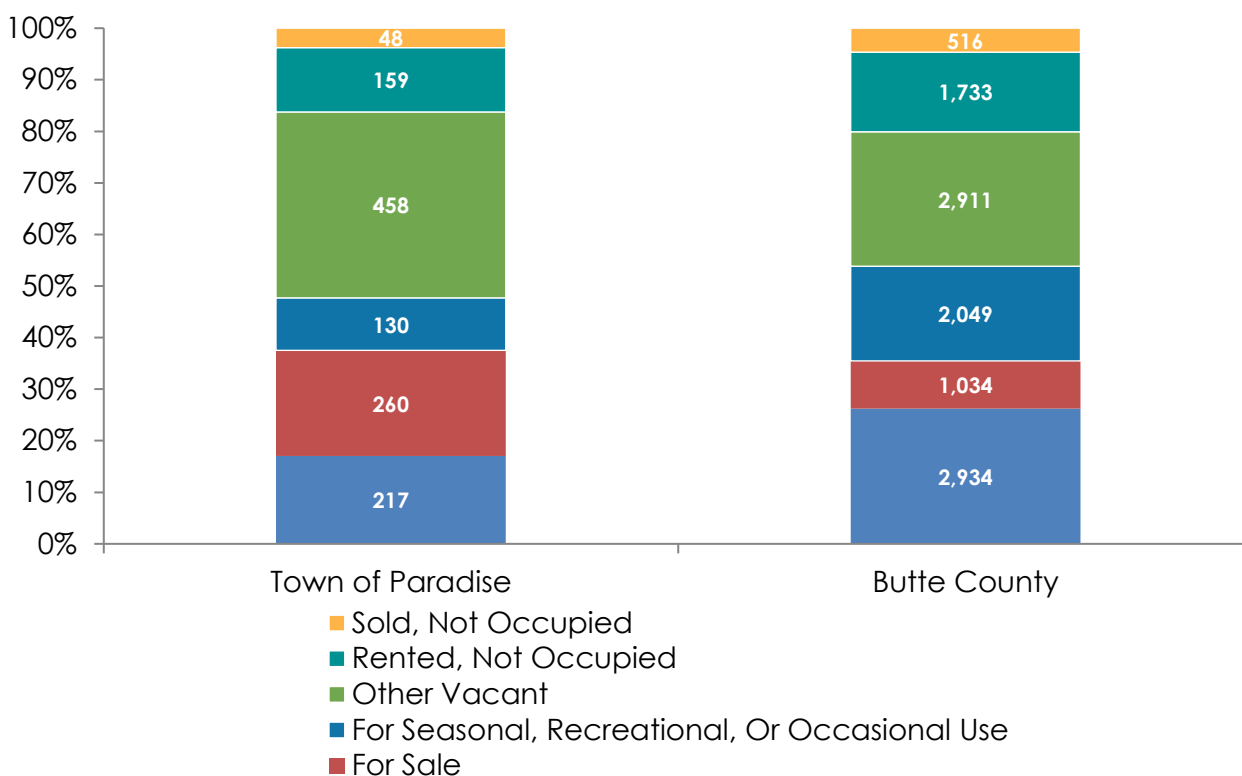
Universe: Housing units

Source: Urban Footprint.

For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-10.

<sup>9</sup> This data originates from parcel data provided by CoreLogic: most columns come directly from the CoreLogic source data, while others are calculated using CoreLogic attributes. The layer reflects the most recent quarterly parcel data update available as of July 2021.

Before the fire, vacant units made up 12 percent of the overall housing stock in Paradise. Of the vacant units, the most common type of vacancy was *Other Vacant* (see Figure 22). No further data since 2018 has been collected on vacancies in Paradise, so we cannot infer that these numbers are reflective of the current housing needs as 95 percent of buildings were destroyed.



**Figure 22: Vacant Units by Type**

Universe: Vacant housing units

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25004.

For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-02.

Throughout Butte County, before the fire, vacancies made up 12 percent of the total housing units, with homes listed for rent, units used for *recreational or occasional use*, and units not otherwise classified (*other vacant*) making up the majority of vacancies. The Census Bureau classifies a unit as vacant if no one is occupying it when census interviewers are conducting the American Community Survey or Decennial Census. Vacant units classified as “for recreational or occasional use” are those that are held for short-term periods of use throughout the year. Accordingly, vacation rentals and short-term rentals like AirBnB are likely to fall in this category. The Census Bureau classifies units as “other vacant” if they are vacant due to foreclosure, personal/family reasons, legal proceedings, repairs/renovations, abandonment, preparation for being rented or sold, or vacant for an extended absence for reasons such as a work assignment, military duty, or incarceration.<sup>10</sup> In a region that has experienced multiple fires

<sup>10</sup> For more information, see pages 3 through 6 of this of definitions prepared by the Census Bureau: <https://www.census.gov/housing/hvs/definitions.pdf>.

that have destroyed a large number of homes, units being renovated/repaired and prepared for occupants moving back in are likely to represent a large portion of the “other vacant” category.

Between 2015 and 2019, 121 housing units were issued permits in Paradise. Over half (59 percent) of permits issued in Paradise were for above low-income housing, 35 percent were for above moderate-income housing, and 7 percent were for moderate-income housing (see Table 4). There were no very low-income permits issued in this time period. However, as of July 2020, building permits were finalized for 1,079 housing units since the Camp Fire and another 854 units had been issued building permits.

**Table 4: Housing Permitting**

Income Group	Permits Issued
Above Moderate	42
Very Low	0
Low	71
Moderate	8

*Universe: Housing permits issued between 2015 and 2019*

*Notes: HCD uses the following definitions for the four income categories: Very Low Income: units affordable to households making less than 50 percent of the Area Median Income for the county in which the jurisdiction is located. Low Income: units affordable to households making between 50 percent and 80 percent of the Area Median Income for the county in which the jurisdiction is located. Moderate Income: units affordable to households making between 80 percent and 120 percent of the Area Median Income for the county in which the jurisdiction is located. Above Moderate Income: units affordable to households making above 120 percent of the Area Median Income for the county in which the jurisdiction is located.*

*Source: California Department of Housing and Community Development (HCD), 5th Cycle Annual Progress Report Permit Summary (2020). This table is included in the Data Packet Workbook as Table HSG-11.*

## 5.2 ASSISTED HOUSING DEVELOPMENTS AT-RISK OF CONVERSION

While there is an immense need to produce new affordable housing units, ensuring that the existing affordable housing stock remains affordable is equally important. Additionally, it is typically faster and less expensive to preserve currently affordable units that are at risk of converting to market-rate than it is to build new affordable housing.

All three projects that were identified as at-risk in the 2014-2022 were destroyed in the Camp Fire. One of the three projects is currently under reconstruction and one is actively working on financing to rebuild. According to the California Housing Partnership’s Preservation Database and Town staff, there are no at-risk projects. See Table 5 for more information.

**Table 5: Assisted Units and Affordability Status**

Project Name	Address	Pre-Fire Units	Pre-Fire Affordability Exp. Date	Rebuild Status	Anticipated Future Units	Anticipated Affordability Exp. Date
Paradise Gardens III	1040 Buschmann Road	48	12/21/2015	Exploring Funding Options	48	TBD
Cypress Acres Convalescent Hospital	1633 Cypress Lane	50	3/1/2031	N/A	0	N/A
Paradise Community Village	1001 Village Parkway	36	2041	Under Reconstruction	36	2041

*Universe: Previously at-risk projects from the 2014-2022 Housing Element.*

*Source: California Housing Partnership, Preservation Database (2020) and Town of Paradise staff.*

*This table is included in the Data Packet Workbook as Table RISK-01.*

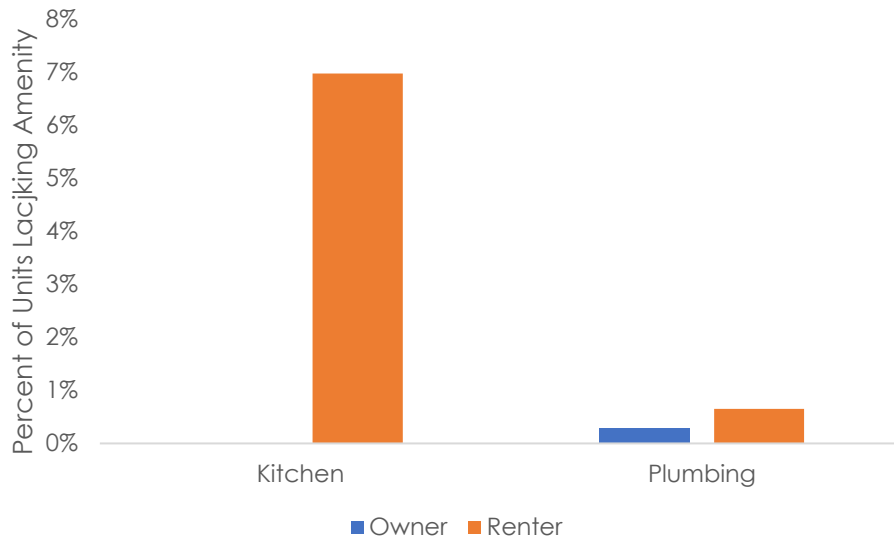
## 5.3 SUBSTANDARD HOUSING

Generally, there is limited data on the extent of substandard housing issues in a community. However, the Census Bureau data included in the graph below (see Figure 23) gives a sense of some of the substandard conditions that may have been present in Paradise prior to the 2018 Camp Fire. For example, 7 percent of renters in Paradise reported lacking a full kitchen and 1 percent of renters lack plumbing, compared to 0 percent of owners who lack a kitchen and 0 percent of owners who lack plumbing. Given the extent of the damage of the 2018 Camp Fire, we can expect that a larger portion of the surviving units may have these issues and others. For example, the Town has determined that many properties have a failing septic system (40-60 percent of all properties) and there are still standing burnt trees on properties that are hazardous to public safety and must be removed. Temporary overhead electrical repairs and reconnections will be replaced by undergrounded electrical from PG&E, as well as potable water lateral replacements due to contamination.

### Note on Substandard Housing

HCD requires Housing Elements to estimate the number of units in need of rehabilitation and replacement. As a data source for housing units in need of rehabilitation and replacement is not available for all jurisdictions after the 2018 Camp Fire, we are not able to provide this required data point in this document. We could anticipate that the surviving housing units have similar rates of deficiencies, but that the new housing does not.





**Figure 23: Substandard Housing Issues**

*Universe: Occupied housing units*

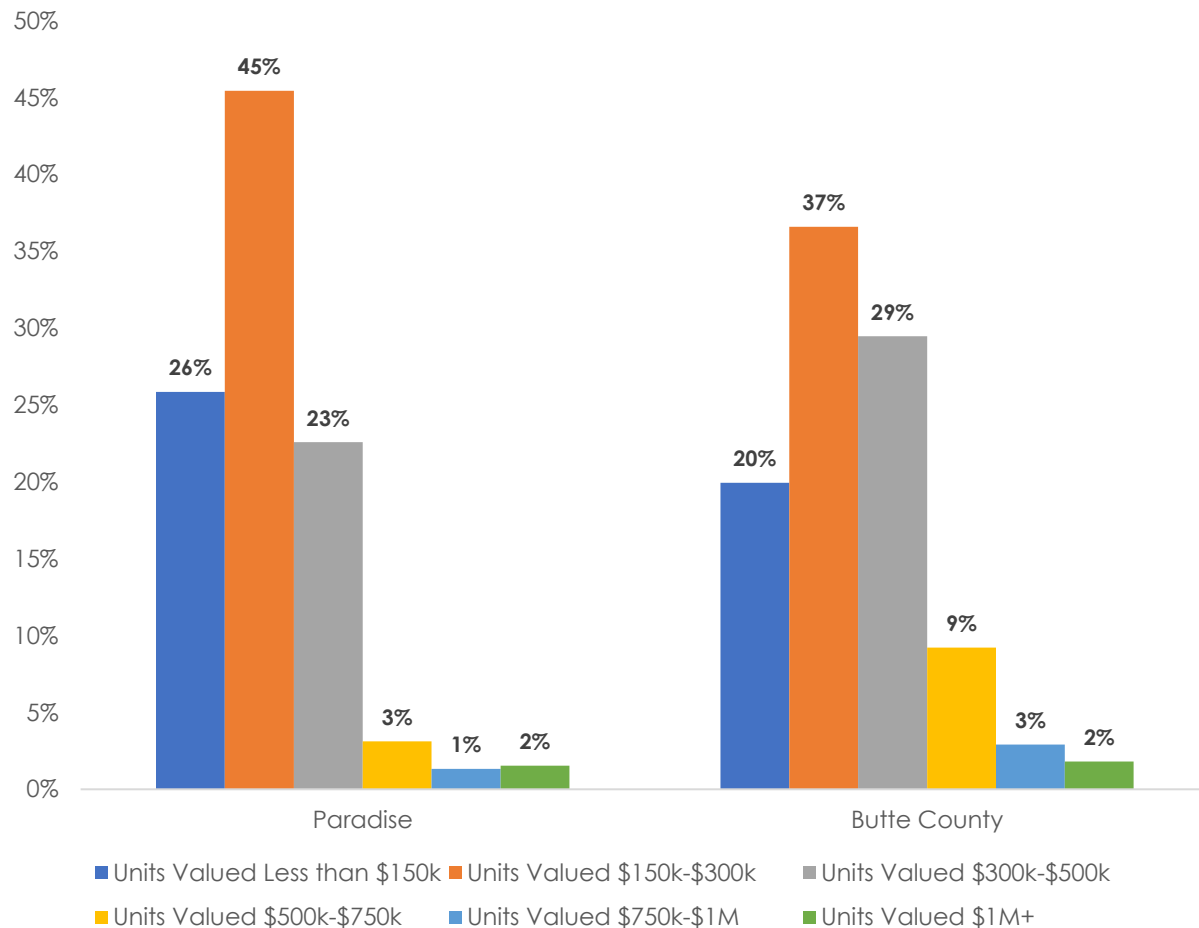
*Notes: Per HCD guidance, this data should be supplemented by local estimates of units needing to be rehabilitated or replaced based on recent windshield surveys, local building department data, knowledgeable builders/developers in the community, or nonprofit housing developers or organizations.*

*Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25053, Table B25043, Table B25049.*

*For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-o8.*

## 5.4 HOME AND RENT VALUES

Home prices reflect a complex mix of supply and demand factors, including an area's demographic profile, labor market, prevailing wages, and job outlook, coupled with land and construction costs. The typical home value in Paradise was estimated at \$303,128 by December of 2020, per data from Zillow. The largest proportion of homes were valued between \$250,000 and \$500,000 (see Figure 24). By comparison, the typical home value is \$344,422 in Butte County, with the largest share of units valued \$250,000 and \$500,000.



**Figure 24: Home Values of Owner-Occupied Units**

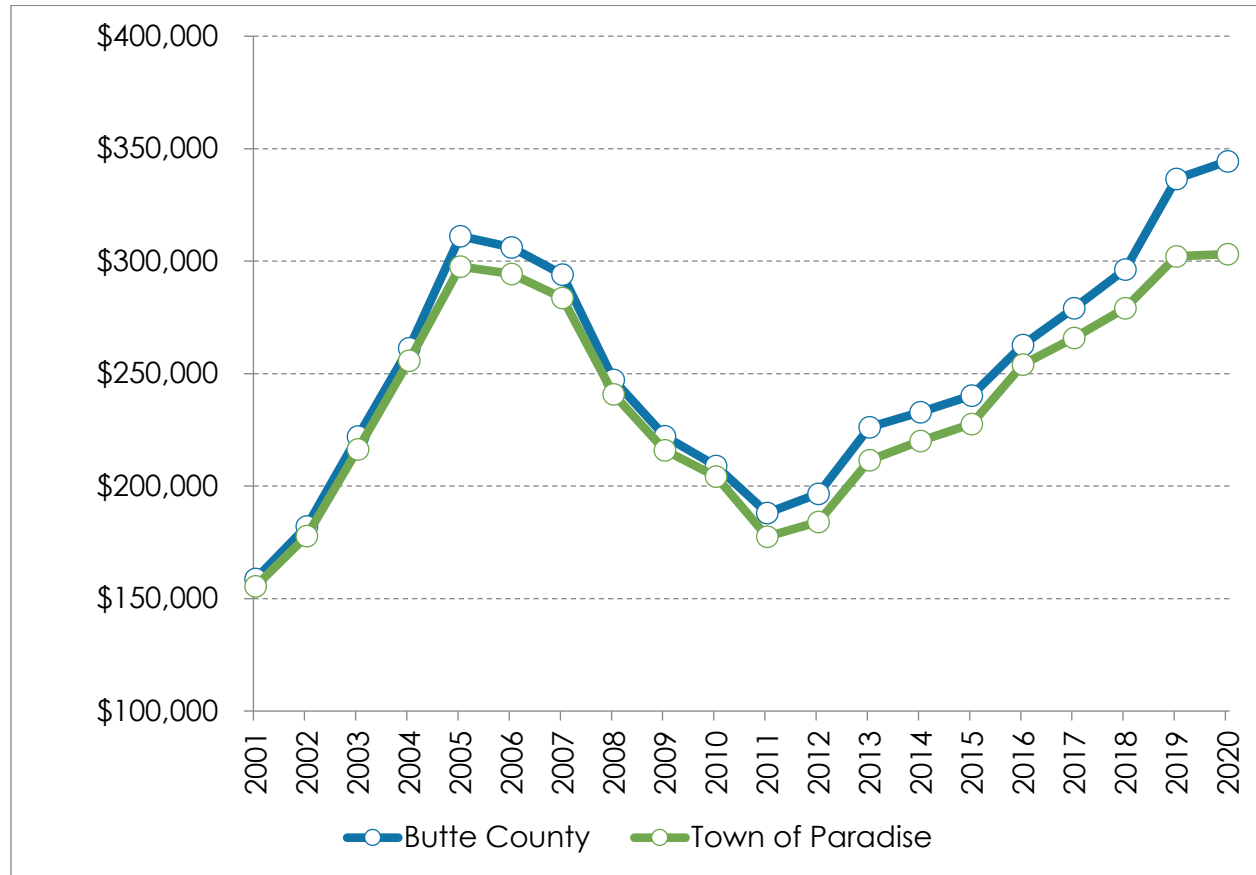
Universe: Owner-occupied units

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25075.

For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-03 and HSG-04.

## APPENDIX A

The region's home values have increased steadily since 2000, besides a decrease during the Great Recession. Since 2001, the typical home value has increased 95 percent in Paradise from approximately \$155,433 in December 2001 to \$303,128 as of December 2020. This increase is even more pronounced for Butte County at large, where the typical home value is \$344,422 (see Figure 25).



**Figure 25: Zillow Home Value Index (ZHVI)**

*Universe: Owner-occupied housing units*

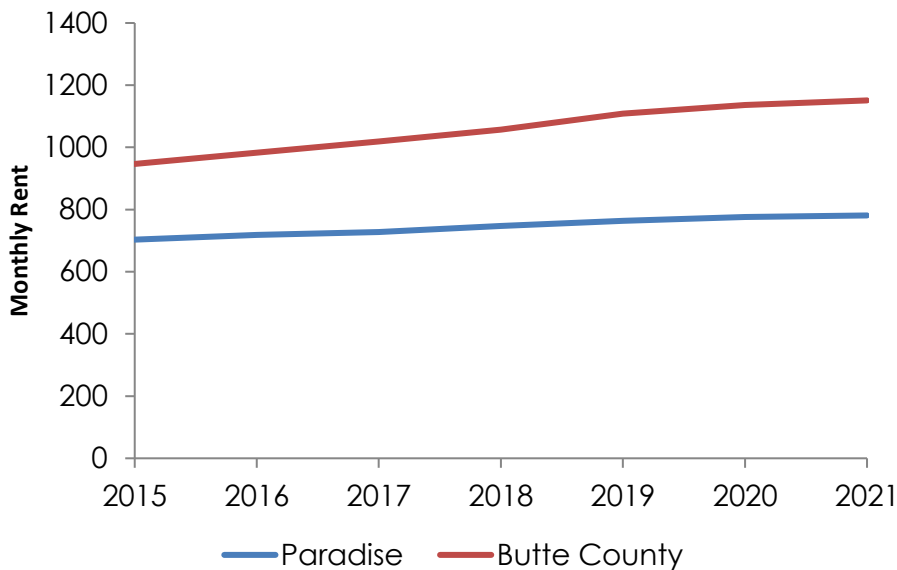
*Notes: Zillow describes the ZHVI as a smoothed, seasonally adjusted measure of the typical home value and market changes across a given region and housing type. The ZHVI reflects the typical value for homes in the 35th to 65th percentile range. The ZHVI includes all owner-occupied housing units, including both single-family homes and condominiums. More information on the ZHVI is available from Zillow. The regional estimate is a household-weighted average of county-level ZHVI files, where household counts are yearly estimates from DOF's E-5 series. For unincorporated areas, the value is a population weighted average of unincorporated communities in the county matched to census-designated population counts.*

*Source: Zillow, Zillow Home Value Index (ZHVI).*

*For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-o8.*

In Paradise, there is an extremely limited dataset of rents. The dataset used by Costar dropped from 14 buildings (176 units) in 2018 to just 3 buildings (66 units) after the fire. These units are all in multi-family buildings, as rent for single-family or other housing types has not been tracked since the 2018 Camp Fire.

However, the median monthly rent of these units has remained somewhere between \$700 and \$800 since 2015 (see Figure 26). Because this dataset is so limited, it may be omitting single-family rental housing or other rental housing and does not necessarily reflect the whole reality. For example, as of July 2021, there are several 2-bedroom units currently advertised online for between \$1,195 and \$1,450 and larger homes listed for over \$2,200.<sup>11</sup> Anecdotally, stakeholders have expressed that there is a lack of affordable housing in the region and that construction costs now preclude the affordable by design projects that were feasible in the past.



**Figure 26: Median Contract Rent for Renter-Occupied Units**

*Universe: Renter-occupied housing units paying cash rent*

*Source: Costar Rental Trends and Development Activity the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-04.*

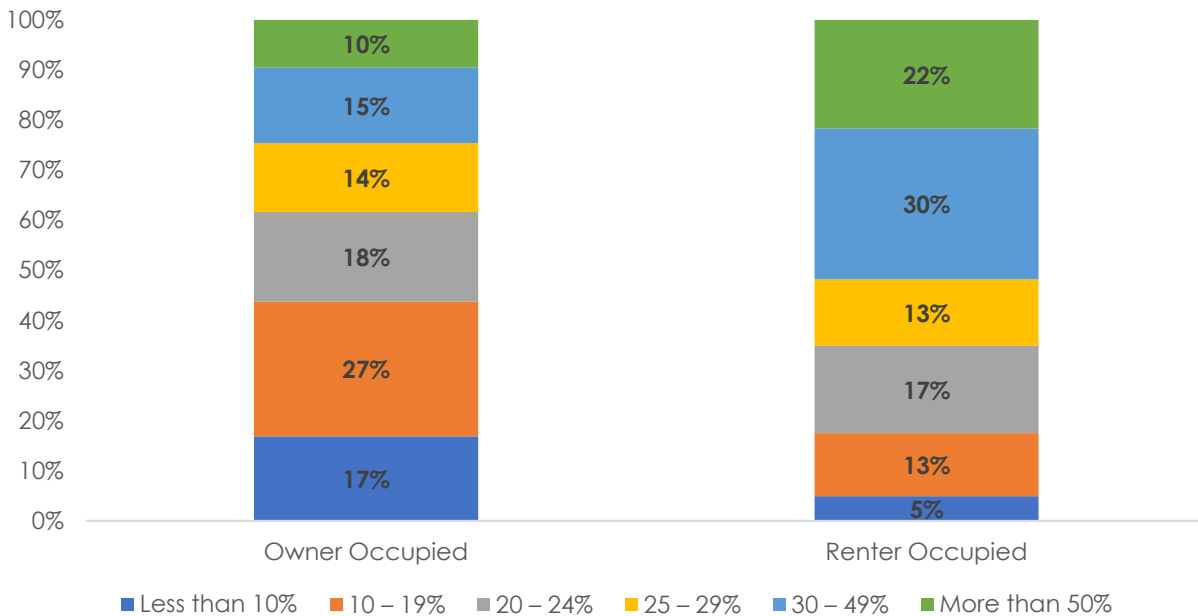
## 5.5 OVERPAYMENT AND OVERCROWDING

A household is considered “cost-burdened” if it spends more than 30 percent of its monthly income on housing costs, while those who spend more than 50 percent of their income on housing costs are considered “severely cost-burdened.” Low-income residents are the most impacted by high housing costs and experience the highest rates of cost burden. Spending such large portions of their income on housing puts low-income households at higher risk of displacement, eviction, or homelessness.

<sup>11</sup> Apartments for rent in Paradise, CA. Retrieved 9 August 2021, from <https://www.apartmentguide.com/apartments/California/Paradise/?boundingBox=-121.725,39.696,-121.556,39.807>

## APPENDIX A

Renters are often more cost-burdened than owners. While the housing market has resulted in home prices increasing over time, homeowners often have mortgages with fixed rates, whereas renters are more likely to be impacted by market increases. When looking at the cost burden across tenure in Paradise, 52 percent of renters spend 30 percent to 50 percent of their income on housing compared to 25 percent of those that own (see Figure 27). Additionally, 22 percent of renters spend 50 percent or more of their income on housing, compared to 10 percent of owners who are severely cost-burdened.



**Figure 27: Cost Burden by Tenure**

*Universe: Occupied housing units*

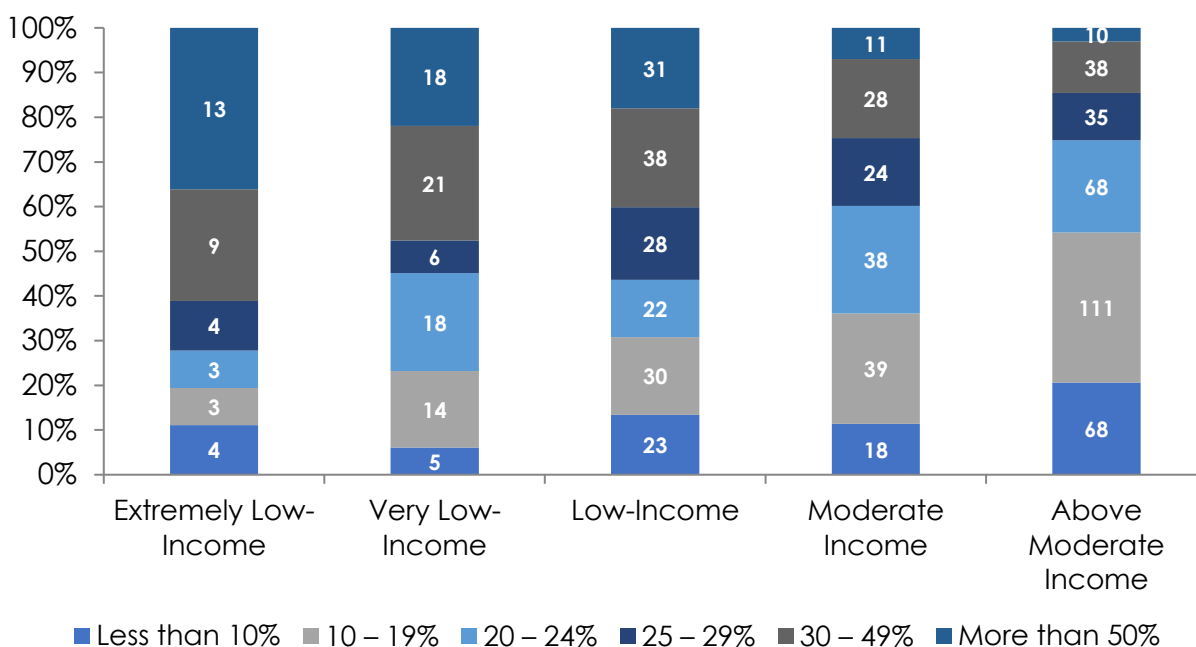
*Notes: Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. HUD defines cost-burdened households as those whose monthly housing costs exceed 30 percent of monthly income, while severely cost-burdened households are those whose monthly housing costs exceed 50 percent of monthly income.*

*Source: U.S. Department of Housing and Urban Development (HUD), Town of Paradise Local Census Survey 2021.*

*For the data table behind this figure, please refer to the Data Packet Workbook, Table OVER-02.*

In Paradise, 11 percent of households spend 50 percent or more of their income on housing, while 17 percent spend 30 percent to 50 percent. However, these rates vary greatly across income categories (see Figure 28). For example, 61 percent of Extremely Low-Income households in Paradise spend are cost burdened and 36 percent spend over half of their income on housing. For Paradise residents with Moderate or Above Moderate incomes, just 4 percent are severely cost-burdened, and 82 percent with Moderate or Above Moderate incomes spend less than 30 percent of their income on housing.

Currently, people of color are more likely to experience poverty and financial instability as a result of federal and local housing policies that have historically excluded them from the same opportunities extended to white residents. As a result, they often pay a greater percentage of their income on housing, and in turn, are at a greater risk of housing insecurity.



**Figure 28: Cost Burden by Income Level**

*Universe: Occupied housing units*

*Notes: Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. HUD defines cost-burdened households as those whose monthly housing costs exceed 30 percent of monthly income, while severely cost-burdened households are those whose monthly housing costs exceed 50 percent of monthly income. Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Alameda and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located.*

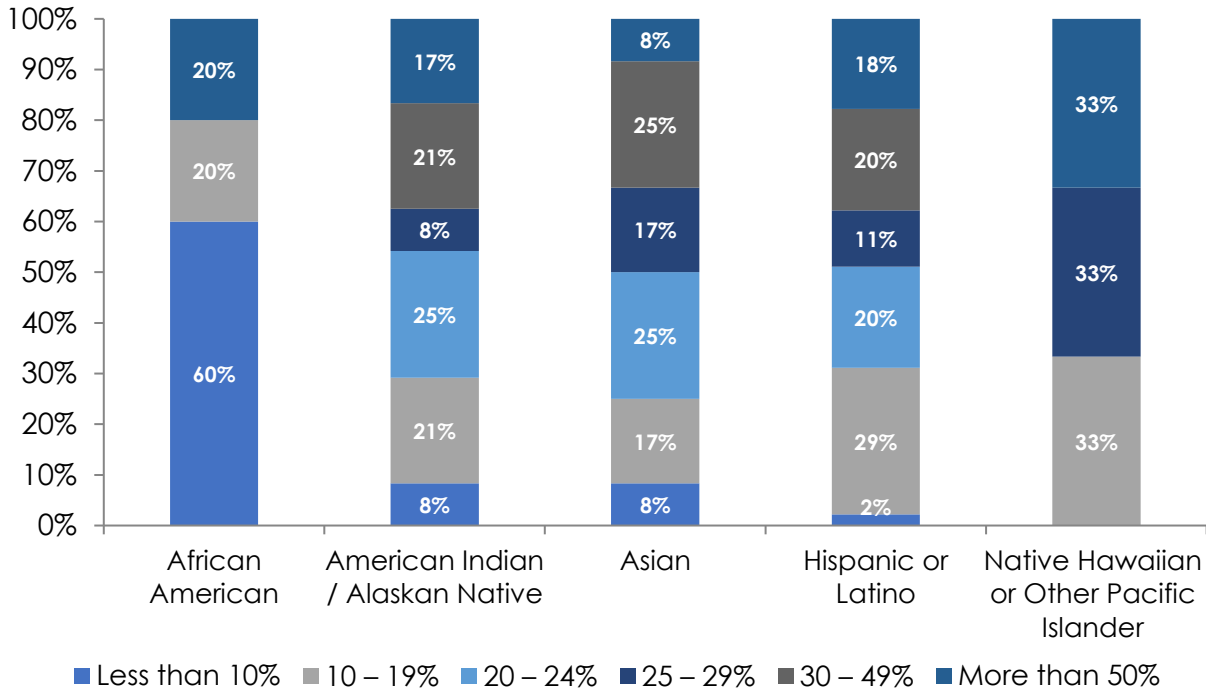
*Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release.*

*For the data table behind this figure, please refer to the Data Packet Workbook, Table OVER-01.*

Although the Town of Paradise Local Census Survey of 2021 has limited racial data, *Asian* respondents are the most cost burdened with 25 percent spending 30 percent to 50 percent of their income on housing, and *Native Hawaiian or Other Pacific Islander* residents are the most severely cost burdened with 33 percent spending more than 50 percent of their income on housing (see Figure 29).

## APPENDIX A

Large family households often have special housing needs due to a lack of adequately sized affordable housing available. The higher costs required for homes with multiple bedrooms can result in larger families experiencing a disproportionate cost burden than the rest of the population and can increase the risk of housing insecurity.



**Figure 29: Cost Burden by Race**

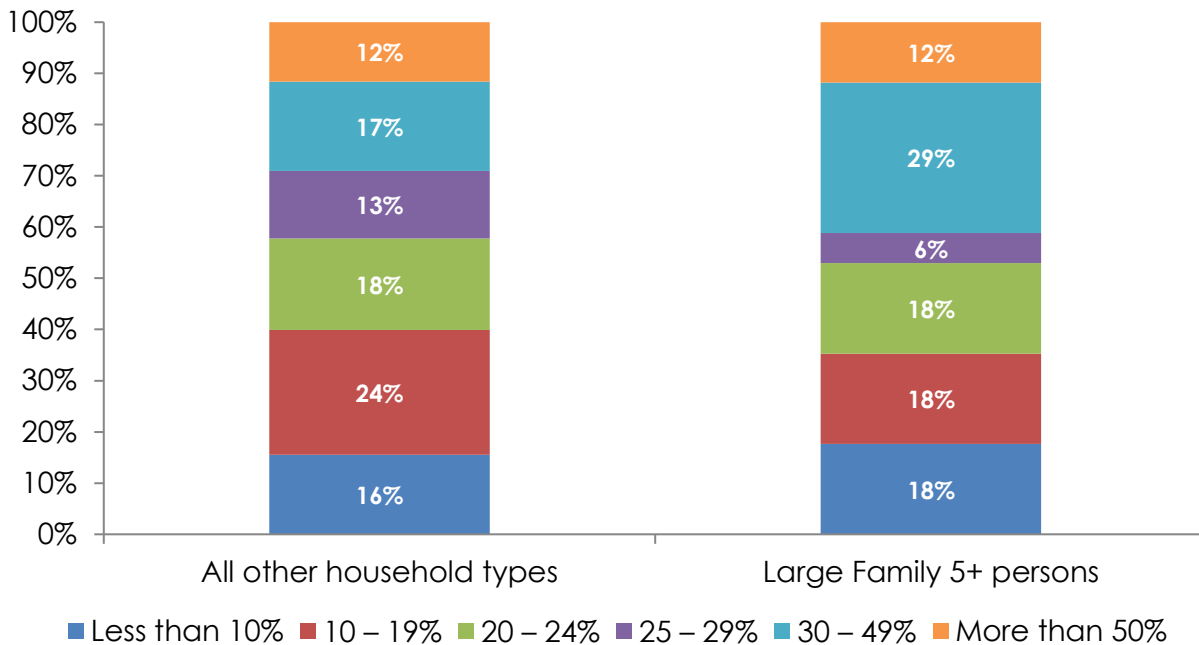
*Universe: Occupied housing units*

*Notes: Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. HUD defines cost-burdened households as those whose monthly housing costs exceed 30 percent of monthly income, while severely cost-burdened households are those whose monthly housing costs exceed 50 percent of monthly income. For the purposes of this graph, the "Hispanic or Latinx" racial/ethnic group represents those who identify as having Hispanic/Latinx ethnicity and may also be members of any racial group. All other racial categories on this graph represent those who identify with that racial category and do not identify with Hispanic/Latinx ethnicity.*

*Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release.*

*For the data table behind this figure, please refer to the Data Packet Workbook, Table OVER-04.*

In Paradise, 29 percent of large family households experience a cost burden of 30 percent-50 percent, while 12 percent of large households spend more than half of their income on housing. Some 17 percent of all other households have a cost burden of 30 percent-50 percent, with 12 percent of households spending more than 50 percent of their income on housing (see Figure 30).



**Figure 30: Cost Burden by Household Size**

*Universe: Occupied housing units*

*Notes: Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. HUD defines cost-burdened households as those whose monthly housing costs exceed 30 percent of monthly income, while severely cost-burdened households are those whose monthly housing costs exceed 50 percent of monthly income.*

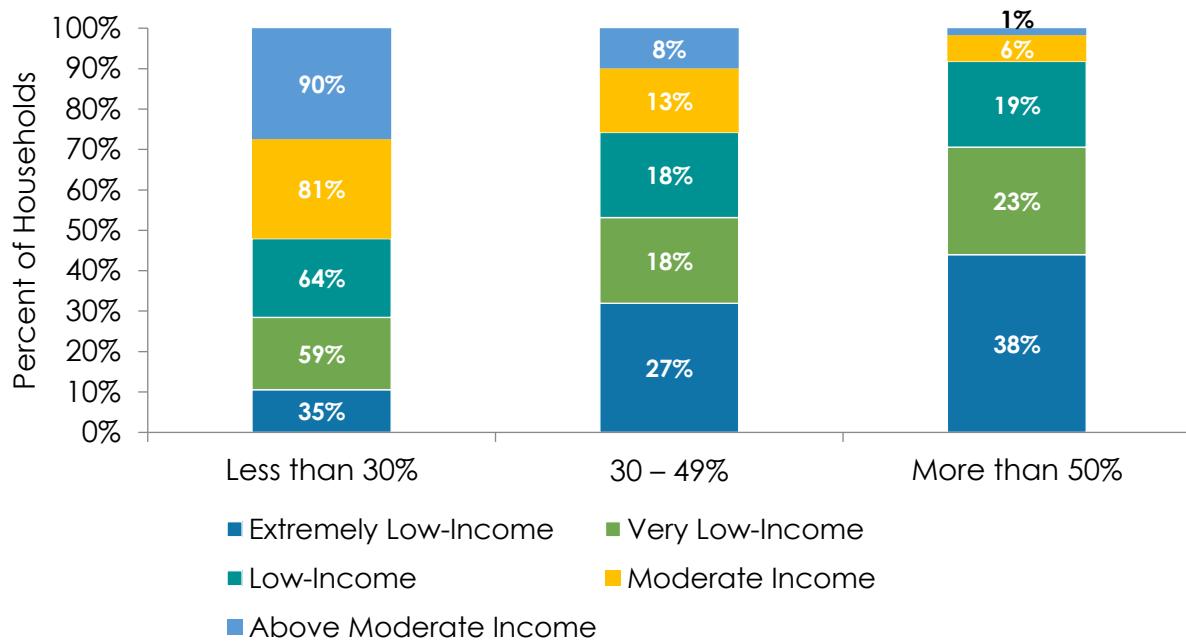
*Source: U.S. Department of Housing and Urban Development (HUD), Town of Paradise Local Census Survey 2021.*

*For the data table behind this figure, please refer to the Data Packet Workbook, Table OVER-05.*

When cost-burdened seniors are displaced from their homes, it puts further stress on the local rental market and forces long-time residents out of the community they call home. Understanding how seniors might be cost-burdened is of particular importance due to their special housing needs, particularly for low-income seniors.



Twenty-eight (28) percent of extremely low- and very low-income seniors (i.e., making less than 30% of AMI) are spending the majority of their income on housing. For Moderate or Above Moderate Income seniors, the vast majority (87 percent) are not cost-burdened and spend less than 30 percent of their income on housing (see Figure 31).



**Figure 31: Cost-Burdened Senior Households by Income Level**

*Universe: Senior households*

*Notes: For the purposes of this graph, senior households are those with a householder who is aged 62 or older. Cost burden is the ratio of housing costs to household income.*

*Source: U.S. Department of Housing and Urban Development (HUD), Town of Paradise Local Census Survey 2021.*

*For the data table behind this figure, please refer to the Data Packet Workbook, Table SEN-02.*

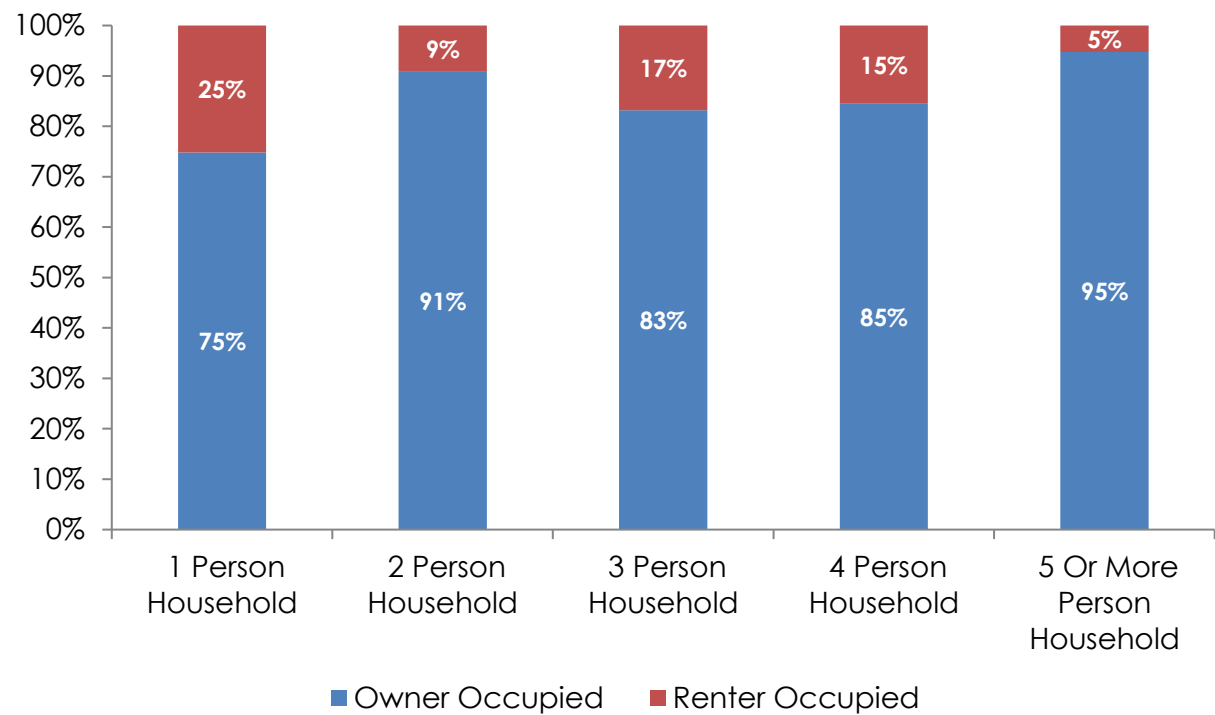
Overcrowding occurs when the number of people living in a household is greater than the home was designed to hold. There are several different standards for defining overcrowding, but this report uses the Census Bureau definition, which is more than one occupant per room (not including bathrooms or kitchens). Additionally, the Census Bureau considers units with more than 1.5 occupants per room to be severely overcrowded. Unfortunately, no data on overcrowding has been collected since the 2018 Camp Fire.

Census data collected prior to the fire reveals that no renter or owner households were severely overcrowded (more than 1.5 occupants per room). However, in Paradise prior to the 2018 fire, 0.3 percent of renters experienced moderate overcrowding (1 to 1.5 occupants per room), compared to 2 percent for those own.

# 6 SPECIAL HOUSING NEEDS

## 6.1 LARGE HOUSEHOLDS

Large households often have different housing needs than smaller households. If a city or town’s rental housing stock does not include larger apartments, large households who rent could end up living in overcrowded conditions. In Paradise, for large households with 5 or more persons, most units (95 percent) are owner occupied (see Figure 32). The Town of Paradise Local Census Survey of 2021 indicates that 17 percent of large households were very low-income, earning less than 50 percent of the area median income (AMI). However, only 19 households with more than five people completed the survey.



**Figure 32: Household Size by Tenure**

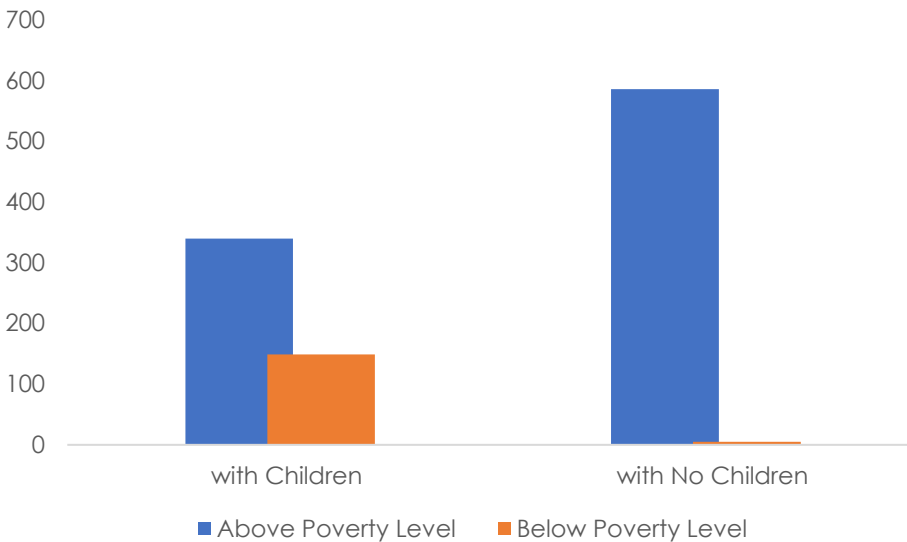
*Universe: Occupied housing units*

*Source: Town of Paradise Local Census Survey 2021.*

*For the data table behind this figure, please refer to the Data Packet Workbook, Table LGFEM-01.*

## APPENDIX A

Female-headed households with children may face particular housing challenges, with pervasive gender inequality resulting in lower wages for women. Moreover, the added need for childcare can make finding a home that is affordable more challenging. While there is no data post-2018 Camp Fire, Census data from before the fire shows that, in Paradise, 30 percent of the 489 female-headed households with children fell below the Federal Poverty Line, while 1 percent of the 591 female-headed households *without* children lived in poverty (see Figure 33).



**Figure 33: Female-Headed Households by Poverty Status**

*Universe: Female Households*

*Notes: The Census Bureau uses a federally defined poverty threshold that remains constant throughout the country and does not correspond to Area Median Income.*

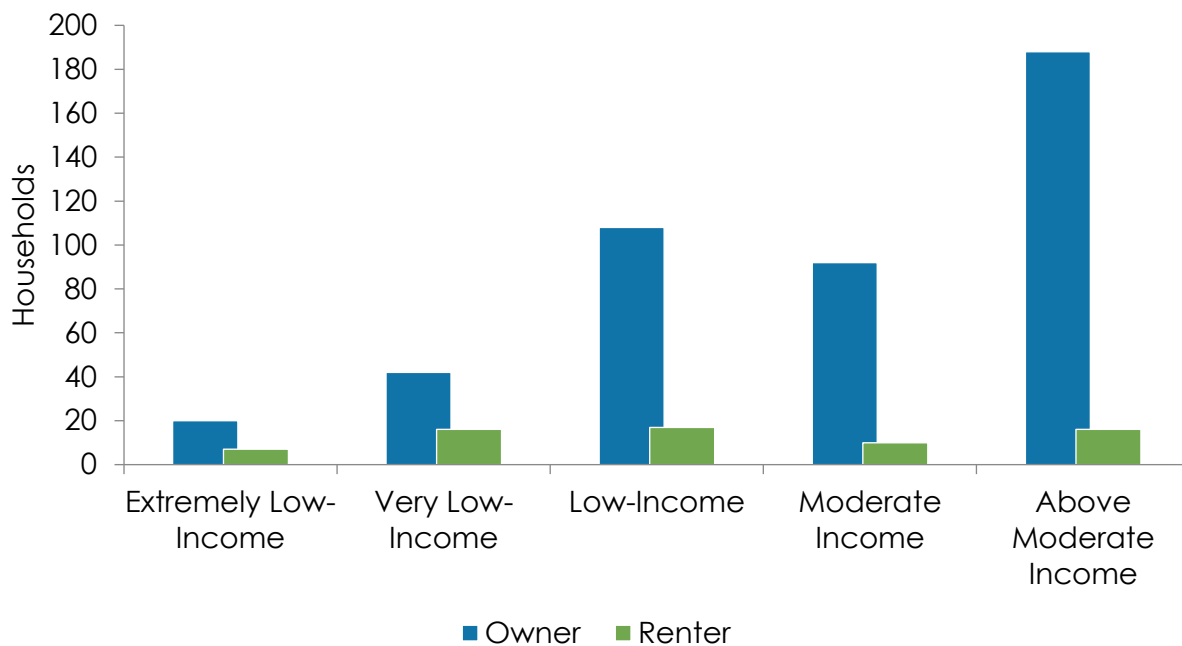
*Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B17012.*

*For the data table behind this figure, please refer to the Data Packet Workbook, Table LGFEM-05.*

## 6.3 SENIORS

Senior households often experience a combination of factors that can make accessing or keeping affordable housing a challenge. They often live on fixed incomes and are more likely to have disabilities, chronic health conditions and/or reduced mobility.

Seniors who rent may be at even greater risk for housing challenges than those who own, due to income differences between these groups. Of the 516 senior households who took the 2021 Town of Paradise Local Census Survey, the largest proportion of senior households who rent are Low-Income, while the largest proportion of senior households who are homeowners falls in the income group Above Moderate Income (see Figure 34).



**Figure 34: Senior Households by Income and Tenure**

*Universe: Senior households*

*Notes: For the purposes of this graph, senior households are those with a householder who is aged 62 or older. Income groups are based on HUD calculations for Area Median Income (AMI). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located.*

*Source: Town of Paradise 2021 Local Census Survey.*

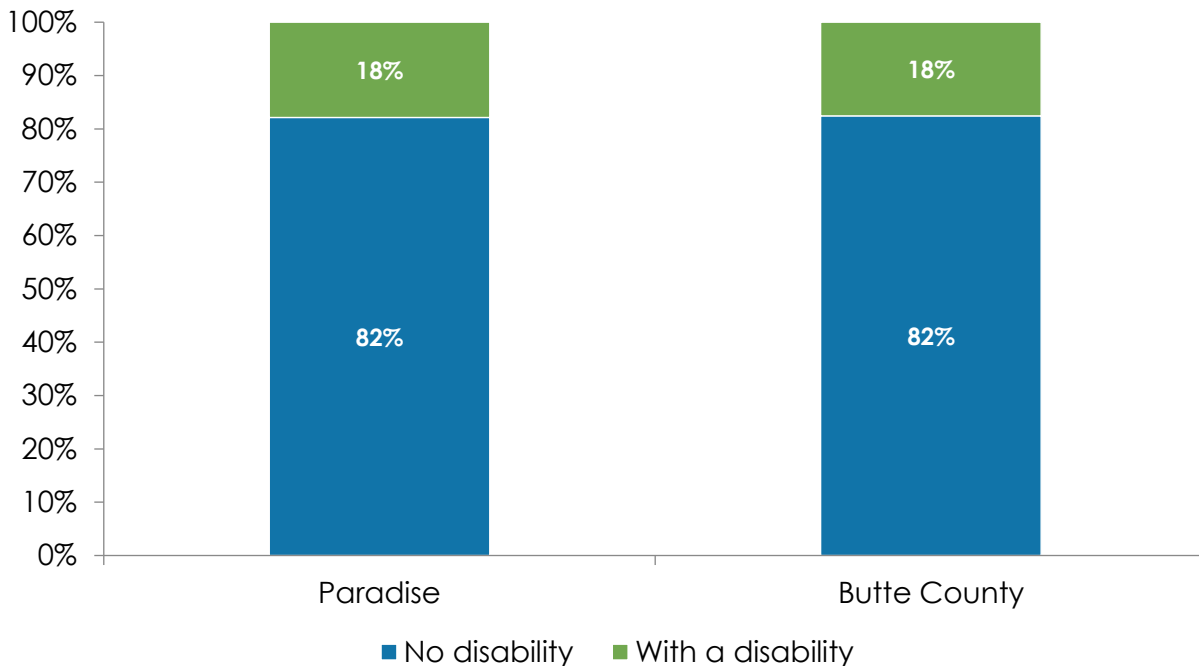
*For the data table behind this figure, please refer to the Data Packet Workbook, Table SEN-01.*

## 6.4 PEOPLE WITH DISABILITIES

People with disabilities face additional housing challenges. Encompassing a broad group of individuals living with a variety of physical, cognitive, and sensory impairments, many people with disabilities live on fixed incomes and need specialized care, yet often rely on family members for assistance due to the high cost of care.

When it comes to housing, people with disabilities are not only in need of affordable housing but accessibly designed housing, which offers greater mobility and opportunity for independence.

Unfortunately, the need typically outweighs what is available. People with disabilities are at a high risk for housing insecurity, homelessness, and institutionalization, particularly when they lose aging caregivers. Figure 35 shows that overall, 18 percent of people in the Town of Paradise have a disability of any kind (compared with 7 percent statewide).



**Figure 35: Population by Disability Status**

*Universe: Civilian noninstitutionalized population 18 years and over*

*Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B18101; Town of Paradise Local Census Survey 2021.*

*For the data table behind this figure, please refer to the Data Packet Workbook, Table DISAB-01.*

State law also requires Housing Elements to examine the housing needs of people with developmental disabilities. Developmental disabilities are defined as severe, chronic, and attributed to a mental or physical impairment that begins before a person turns 18 years old. This can include Down's Syndrome, autism, epilepsy, cerebral palsy, and mild to severe mental retardation. Some people with developmental disabilities are unable to work, rely on Supplemental Security Income, and live with family members. In addition to their specific housing needs, they are at increased risk of housing insecurity after an aging parent or family member is no longer able to care for them. In Paradise, there are at least 93 persons with disabilities, 33 of which are under 18 and between 60 and 71 of which are adults over the age of 18 (see Table 6).<sup>12</sup>

<sup>12</sup> This is the only data available that was captured after the 2018 Camp Fire and the beginning of the rebuilding process. Census Data and California Department of Developmental Services data by zip code does not accurately depict the most current situation in Paradise.

**Table 6: Population with Developmental Disabilities by Age**

Age Group	Value
Age 18+	Between 60-71
Age Under 18	33
<b>Total</b>	<b>&gt;93</b>

*Universe: Population with developmental disabilities*

*Notes: The California Department of Developmental Services is responsible for overseeing the coordination and delivery of services to more than 330,000 Californians with developmental disabilities including cerebral palsy, intellectual disability, Down syndrome, autism, epilepsy, and related conditions. The California Department of Developmental Services provides ZIP code level counts. To get jurisdiction-level estimates, ZIP code counts were crosswalked to jurisdictions using census block population counts from Census 2010 SF1 to determine the share of a ZIP code to assign to a given jurisdiction.*

*Source: California Department of Developmental Services, Consumer Count by California ZIP Code and Age Group (June 2021).*

*This table is included in the Data Packet Workbook as Table DISAB-02.*

Unfortunately, there is no data that accurately describes disability by type after the 2018 Camp Fire. However, American Community Survey (ACS) data show that of the 4,914 total persons with disabilities from *before the 2018 Camp Fire*, 28.1 percent had a hearing difficulty, 14.2 percent had vision difficulty, 47.3 percent had a cognitive difficulty, 46.8 percent had an ambulatory difficulty, 24.1 percent had a self-care difficulty, and 40.6 percent had independent living difficulties. 2,311, or 47 percent, of this total population was over the age of 64. Data on developmental disabilities by residence is up-to-date and shows that the most common living arrangement for individuals with developmental disabilities in Paradise is the home of parent /family/guardian (see Table 7).

**Table 7: Population with Developmental Disabilities by Residence**

Residence Type	Value
Home of Parent /Family / Guardian	61
Community Care Facility	0
Foster / Family Home	<11
Intermediate Care Facility	17
Independent / Supported Living	14-25
Other	0
<b>Total</b>	<b>&gt;92</b>

*Universe: Population with developmental disabilities*

*Notes: The California Department of Developmental Services is responsible for overseeing the coordination and delivery of services to more than 330,000 Californians with developmental disabilities including cerebral palsy, intellectual disability, Down syndrome, autism, epilepsy, and related conditions. The California Department of Developmental Services provides ZIP code level counts. To get jurisdiction-level estimates, ZIP code counts were crosswalked to jurisdictions using census block population counts from Census 2010 SF1 to determine the share of a ZIP code to assign to a given jurisdiction.*

*Source: California Department of Developmental Services, Consumer Count by California ZIP Code and Residence Type (June 2021).*

*This table is included in the Data Packet Workbook as Table DISAB-03.*

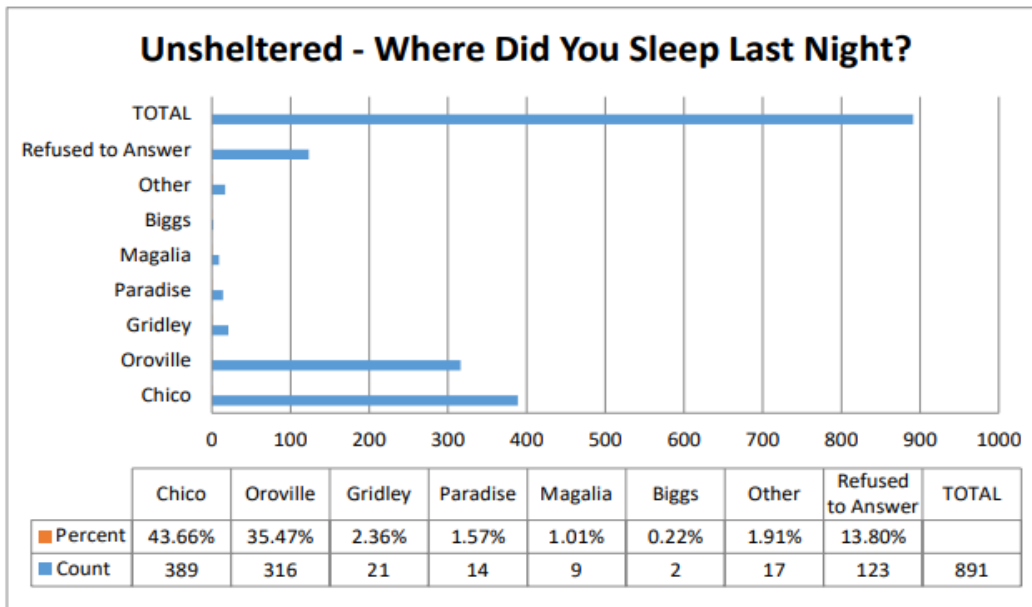
## 6.5 HOMELESSNESS

Homelessness remains an urgent challenge in many communities across the state, reflecting a range of social, economic, and psychological factors. Rising housing costs result in increased risks of community members experiencing homelessness. Far too many residents who have found themselves housing insecure have ended up unhoused or homeless in recent years, either temporarily or longer term. Addressing the specific housing needs for the unhoused population remains a priority throughout the state, particularly since homelessness is disproportionately experienced by people of color, people with disabilities, those struggling with addiction and those dealing with traumatic life circumstances.

The Homeless Point in Time Survey is federally mandated by the U.S. Department of Housing and Urban Development (HUD) to survey the sheltered and unsheltered homeless population in cities and counties throughout the nation. HUD defines sheltered homeless persons as adults, children, and youth, and unaccompanied children who, on the night of the survey, are living in shelters or transitional housing for the homeless. HUD defines unsheltered homeless as those who reside in places not meant for human habitation, such as cars, parks, sidewalks, abandoned buildings, or on the street. The PIT Survey is conducted on one night and provides a snapshot of a county's visible homeless population. Historically, the PIT Survey has undercounted the total homeless population because it is not possible to contact all persons who live in alternative housing arrangements. Furthermore, it has long been known that a number of people experiencing unstable housing may live in a variety of shared housing arrangements or couch surf, and people in this situation are not counted in the PIT survey. The PIT Survey is simply a summary of those persons with whom contact was made on a designated day; it is not intended to represent a complete count of the homeless population who live in Butte County. The data presented each year through the official Annual Housing Assessment Report (AHAR) are labeled as an "estimate" of the homeless population.

The 2019 PIT Count in Butte County identified a total of 2,304 sheltered, unsheltered and FEMA housed homeless adults and children county wide (891 unsheltered, 420 sheltered, and 993 people sheltered with FEMA support), which is 16 percent higher than the count in 2017 (1,983). The significant increase in the 2019 PIT Count can be attributed to: Camp Fire related homeless in FEMA provided housing (temporary), increased survey efficiency through use of a mobile web-based technology instead of paper surveys, implementation of revised survey questions to follow HUD guidelines (e.g., chronic homeless, domestic violence), planned targeting of encampment sites, and broad participation from the community.

The 2019 PIT Survey identified 1,551 homeless households countywide. Two hundred and one (201) households resided in Emergency Shelter, 65 in Transitional Housing, 397 in FEMA housing, and 888 were unsheltered. Despite these efforts to improve the accuracy of the survey, the actual number of homeless individuals is estimated to be higher than PIT Survey results due to ongoing challenges in locating homeless individuals, especially those who are displaced and unhoused due to the Camp Fire. Of the 891 unsheltered individuals, 2 percent had slept in the Town of Paradise the night prior to the count (see Figure 36).



**Figure 36: Unsheltered Point-in-Time (PIT) Count in Butte County**

*Universe: Population experiencing homelessness*

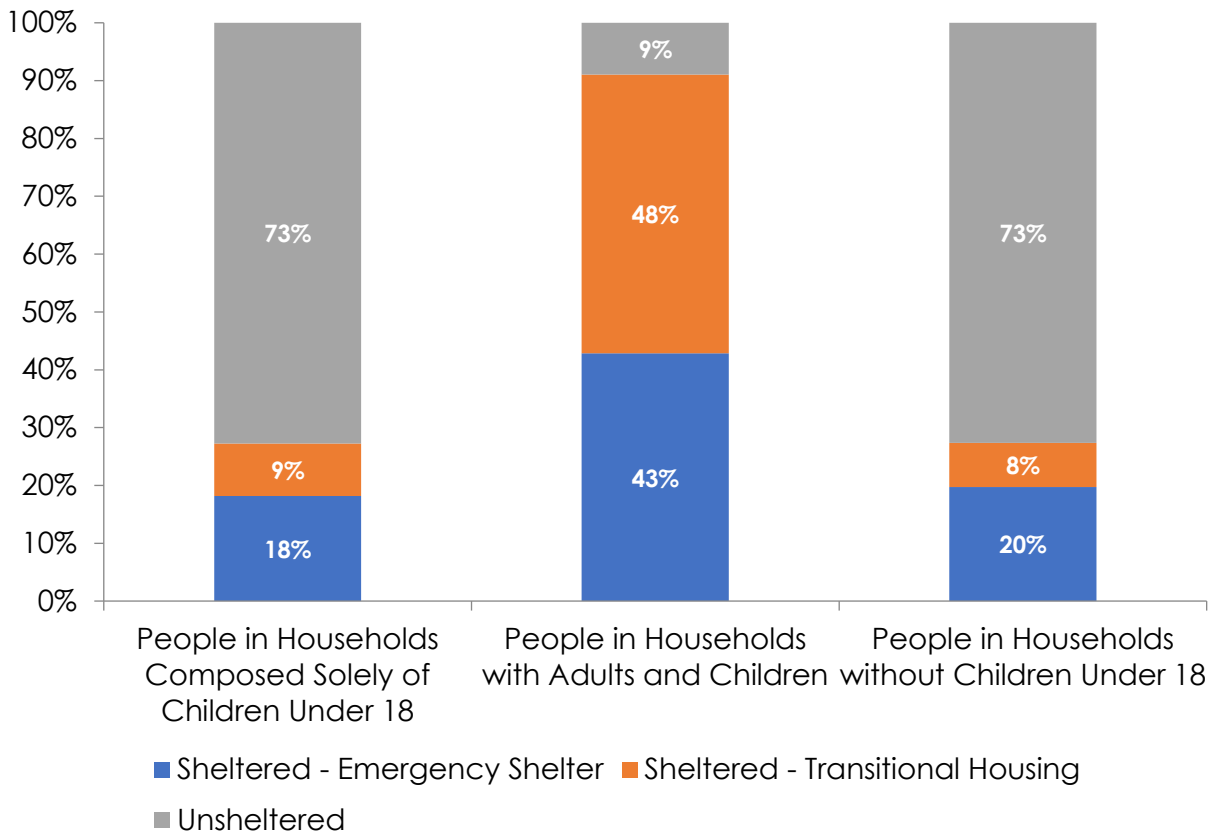
*Notes: This data is based on Point-in-Time (PIT) information provided to HUD by CoCs in the application for CoC Homeless Assistance Programs. The PIT Count provides a count of sheltered and unsheltered homeless persons on a single night during the last ten days in January.*

*Source: Butte Countywide Homeless Continuum of Care.*

In Butte County, the most common type of household experiencing homelessness is those without children in their care. Among households experiencing homelessness that do not have children, 73 percent are unsheltered. Of homeless households with children, most are sheltered in transitional housing or emergency shelter (see Figure 37).



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**Figure 37: Homelessness by Household Type and Shelter Status, Chico, Paradise/Butte County**

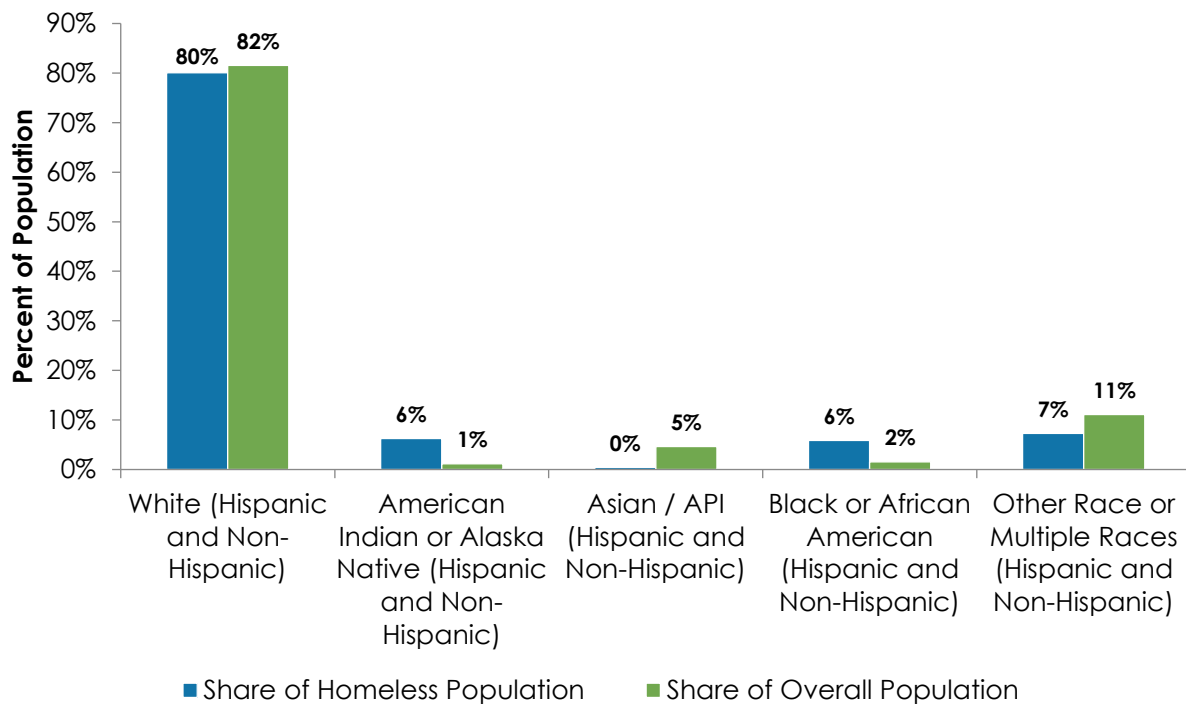
*Universe: Population experiencing homelessness*

*Notes: This data is based on Point-in-Time (PIT) information provided to HUD by CoCs in the application for CoC Homeless Assistance Programs. The PIT Count provides a count of sheltered and unsheltered homeless persons on a single night during the last ten days in January.*

*Source: U.S. Department of Housing and Urban Development (HUD), Continuum of Care (CoC) Homeless Populations and Subpopulations Reports (2019).*

*For the data table behind this figure, please refer to the Data Packet Workbook, Table HOMELS-01.*

People of color are more likely to experience poverty and financial instability as a result of federal and local housing policies that have historically excluded them from the same opportunities extended to white residents. Consequently, people of color are often disproportionately impacted by homelessness. In Butte County, American Indian or Alaska Native (Hispanic and Non-Hispanic) make up 6 percent of the homeless population, while making up only 1 percent of the overall population. Similarly, Black or African American (Hispanic or Non-Hispanic) residents make up 6 percent of the homeless population, while making up only 2 percent of the overall population (see Figure 38).



**Figure 38: Racial Group Share of General and Homeless Populations, Butte County**

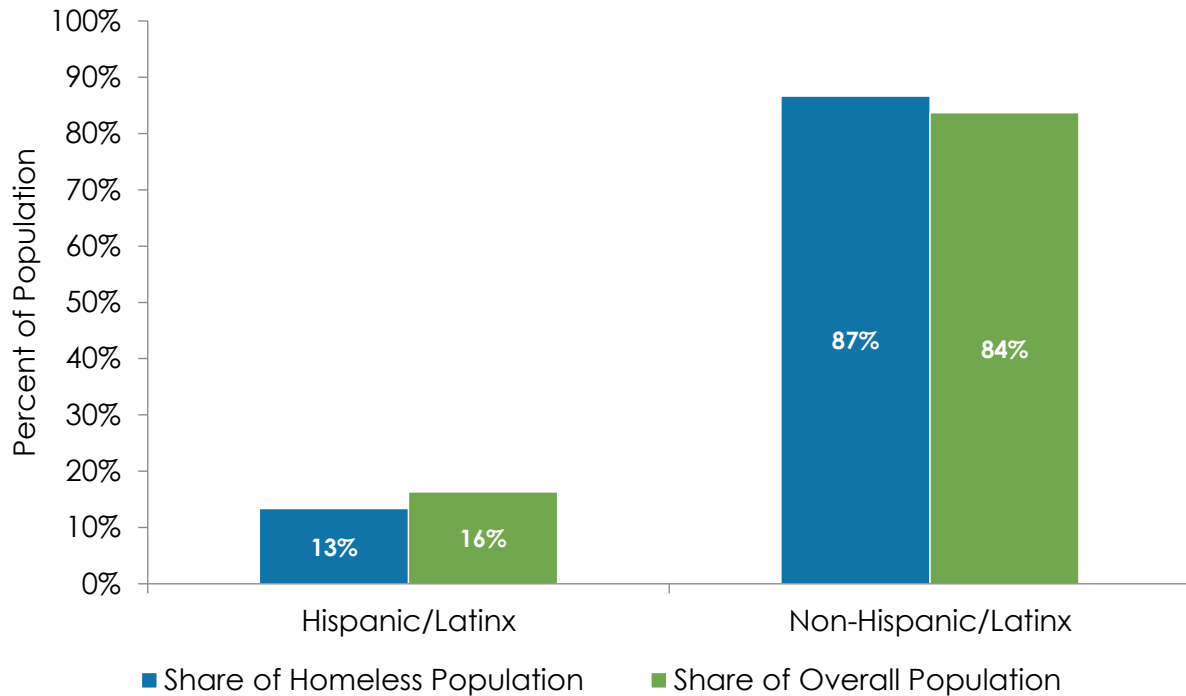
*Universe: Population experiencing homelessness*

*Notes: This data is based on Point-in-Time (PIT) information provided to HUD by CoCs in the application for CoC Homeless Assistance Programs. The PIT Count provides a count of sheltered and unsheltered homeless persons on a single night during the last ten days in January. HUD does not disaggregate racial demographic data by Hispanic/Latinx ethnicity for people experiencing homelessness. Instead, HUD reports data on Hispanic/Latinx ethnicity for people experiencing homelessness in a separate table. Accordingly, the racial group data listed here includes both Hispanic/Latinx and non-Hispanic/Latinx individuals.*

*Source: U.S. Department of Housing and Urban Development (HUD), Continuum of Care (CoC) Homeless Populations and Subpopulations Reports (2019); U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B01001(A-I).*

*For the data table behind this figure, please refer to the Data Packet Workbook, Table HOMELS-02.*

In Butte County, Latinx residents represent 13 percent of the population experiencing homelessness, while Latinx residents comprise 16 percent of the general population (see Figure 39).



**Figure 39: Latinx Share of General and Homeless Populations, Butte County**

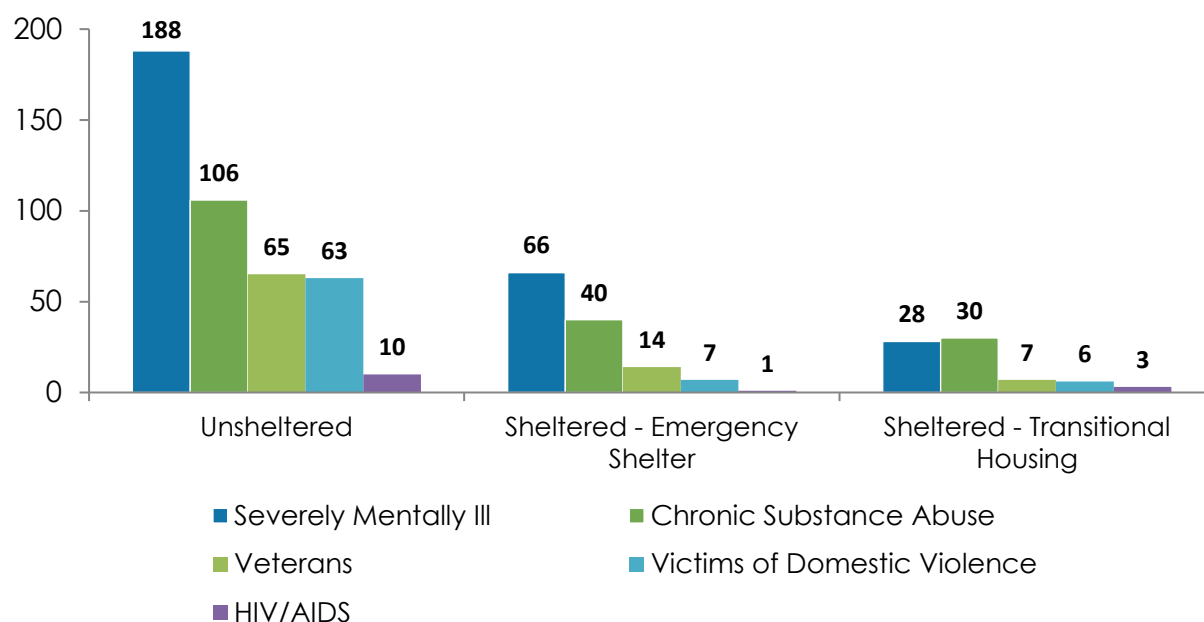
*Universe: Population experiencing homelessness*

*Notes: This data is based on Point-in-Time (PIT) information provided to HUD by CoCs in the application for CoC Homeless Assistance Programs. The PIT Count provides a count of sheltered and unsheltered homeless persons on a single night during the last ten days in January. The data from HUD on Hispanic/Latinx ethnicity for individuals experiencing homelessness does not specify racial group identity. Accordingly, individuals in either ethnic group identity category (Hispanic/Latinx or non-Hispanic/Latinx) could be of any racial background.*

*Source: U.S. Department of Housing and Urban Development (HUD), Continuum of Care (CoC) Homeless Populations and Subpopulations Reports (2019); U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B01001(A-I).*

*For the data table behind this figure, please refer to the Data Packet Workbook, Table HOMELS-03.*

Many of those experiencing homelessness are dealing with severe issues – including mental illness, substance abuse and domestic violence – that are potentially life threatening and require additional assistance. In Butte County, homeless individuals are commonly challenged by severe mental illness, with 282 reporting this condition (see Figure 40). Of those, some 67 percent are unsheltered, further adding to the challenge of handling the issue.



**Figure 40: Characteristics for the Population Experiencing Homelessness, Butte County**

*Universe: Population experiencing homelessness*

*Notes: This data is based on Point-in-Time (PIT) information provided to HUD by CoCs in the application for CoC Homeless Assistance Programs. The PIT Count provides a count of sheltered and unsheltered homeless persons on a single night during the last ten days in January. Per HCD's requirements, jurisdictions will need to supplement this county-level data with local estimates of people experiencing homelessness. These challenges/characteristics are counted separately and are not mutually exclusive, as an individual may report more than one challenge/characteristic. These counts should not be summed.*

*Source: U.S. Department of Housing and Urban Development (HUD), Continuum of Care (CoC) Homeless Populations and Subpopulations Reports (2019).*

*For the data table behind this figure, please refer to the Data Packet Workbook, Table HOMEELS-04.*

In Paradise, there were 353 reported students experiencing homelessness in the 2019-20 school year, a 110 percent increase from 2017-18 before the fire (see Table 8). By comparison, Butte County has seen a 50 percent increase in the population of students experiencing homelessness in the same time frame, adding undue burdens on learning and thriving, with the potential for longer term negative effects. As defined by the Department of Education, students are experiencing homelessness if they are unsheltered, living in temporary shelters for people experiencing homelessness, living in hotels/motels, or temporarily doubled up and sharing the housing of other persons due to the loss of housing or economic hardship.

**Table 8: Students in Local Public Schools Experiencing Homelessness**

Academic Year	The Town of Paradise	Butte County
2016-17	142	799
2017-18	168	882
2018-19	10	738
2019-20	353	1,314

Universe: Total number of unduplicated primary and short-term enrollments within the academic year (July 1 to June 30), public schools

Notes: The California Department of Education considers students to be homeless if they are unsheltered, living in temporary shelters for people experiencing homelessness, living in hotels/motels, or temporarily doubled up and sharing the housing of other persons due to the loss of housing or economic hardship. The data used for this table was obtained at the school site level, matched to a file containing school locations, geocoded and assigned to jurisdiction, and finally summarized by geography.

Source: California Department of Education, California Longitudinal Pupil Achievement Data System (CALPADS), Cumulative Enrollment Data (Academic Years 2016-2017, 2017-2018, 2018-2019, 2019-2020).

This table is included in the Data Packet Workbook as Table HOMEELS-05.

## 6.6 FARMWORKERS

Across the state, housing for farmworkers has been recognized as an important and unique concern. Farmworkers generally receive wages that are considerably lower than other jobs and may have temporary housing needs. Finding decent and affordable housing can be challenging, particularly in the current housing market.

In Paradise, there were no reported students of migrant workers in the 2019-20 school year. The trend for the County for the past few years has been between 85-155 migrant worker students (see Table 9).

**Table 9: Migrant Worker Student Population**

Academic Year	The Town of Paradise	Butte County
2016-17	0	85
2017-18	0	155
2018-19	0	93
2019-20	0	123

Universe: Total number of unduplicated primary and short-term enrollments within the academic year (July 1 to June 30), public schools

Notes: The data used for this table was obtained at the school site level, matched to a file containing school locations, geocoded, and assigned to jurisdiction, and finally summarized by geography.

Source: California Department of Education, California Longitudinal Pupil Achievement Data System (CALPADS), Cumulative Enrollment Data (Academic Years 2016-2017, 2017-2018, 2018-2019, 2019-2020).

This table is included in the Data Packet Workbook as Table FARM-01.

According to the U.S. Department of Agriculture Census of Farmworkers, the number of permanent farm workers in Butte County has decreased since 2002, totaling 1,566 in 2017, while the number of seasonal farm workers has also decreased, totaling 2,782 in 2017 (see Figure 41). These data, however, were collected before the 2018 Camp Fire and may no longer be accurate.



**Figure 41: Farm Operations and Farm Labor by County, Butte County**

*Universe: Hired farm workers (including direct hires and agricultural service workers who are often hired through labor contractors)*

*Notes: Farm workers are considered seasonal if they work on a farm less than 150 days in a year, while farm workers who work on a farm more than 150 days are considered to be permanent workers for that farm.*

*Source: U.S. Department of Agriculture, Census of Farmworkers (2002, 2007, 2012, 2017), Table 7: Hired Farm Labor.*

*For the data table behind this figure, please refer to the Data Packet Workbook, Table FARM-02.*

## 6.7 NON-ENGLISH SPEAKERS

California has long been an immigration gateway to the United States, which means that many languages are spoken throughout the state. Since learning a new language is universally challenging, it is not uncommon for residents who have immigrated to the United States to have limited English proficiency. This limit can lead to additional disparities if there is a disruption in housing, such as an eviction, because residents might not be aware of their rights or might be wary to engage due to immigration status concerns. In Paradise, 1 percent of residents 5 years and older identified before the 2018 Camp Fire as speaking English not well or not at all, which is below the proportion for Butte County, where 3 percent of residents 5 years and older reported limited English proficiency. The Town of Paradise 2021 Local Census Survey shows that the majority of people who took the survey (99 percent) speak English as their primary language.

## APPENDIX A

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## APPENDIX B: AFFIRMATIVELY FURTHERING FAIR HOUSING REPORT





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## ASSESSMENT OF FAIR HOUSING

In 2018, California legislators introduced Assembly Bill (AB) 686 to try to ameliorate issues brought about by historic patterns of segregation that have led to neighborhoods with concentrated poverty and poor housing stock, limited access to opportunity, unsafe environmental conditions, underfunded schools, dilapidated infrastructure, and other disproportionately experienced problems throughout the state. AB 686 defines Affirmatively Furthering Fair Housing (AFFH) as “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.”

Specifically, these meaningful actions must aim to accomplish the following:

- Address significant disparities in housing needs and in access to opportunity;
- Replace segregated living patterns with truly integrated and balanced living patterns;
- Transform racially and ethnically concentrated areas of poverty into areas of opportunity; and
- Foster and maintain compliance with civil rights and fair housing laws.

AB 686 also creates new requirements for housing elements due on or after January 2021, including (1) outreach to community stakeholders in the housing element public participation process, (2) an assessment of fair housing practices, (3) an analysis of the relationship between available sites and areas of high or low resources, and (4) concrete actions and programs to affirmatively further fair housing.

In Paradise, Census data that is normally used to identify fair housing issues is outdated. Census data were collected prior to the 2018 Camp Fire and do not reflect the on-the-ground reality that renters and homeowners are facing since the fire and its destruction throughout the town. Instead, to examine fair housing issues for the required assessment of fair housing practices, this chapter uses the Town of Paradise 2021 Local Census data and correspondence with representatives of impacted groups, such as those who lost their homes and developmentally disabled adults, which also addresses the first component of the new Housing Element requirements: outreach. As discussed in Chapter 7: Community Participation, in addition to the standard public hearing process, interviews were conducted with eight stakeholder groups in an effort to reach all segments of the community.

As guided by HCD, the Assessment of Fair Housing is organized by the following five topics:

- Fair Housing Enforcement and Outreach Capacity
- Segregation and Integration
- Racially and Ethnically Concentrated Areas of Poverty (R/ECAP)
- Disparities in Access to Opportunity
- Disproportionate Housing Needs and Displacement Risk

### A. FAIR HOUSING ENFORCEMENT AND OUTREACH CAPACITY

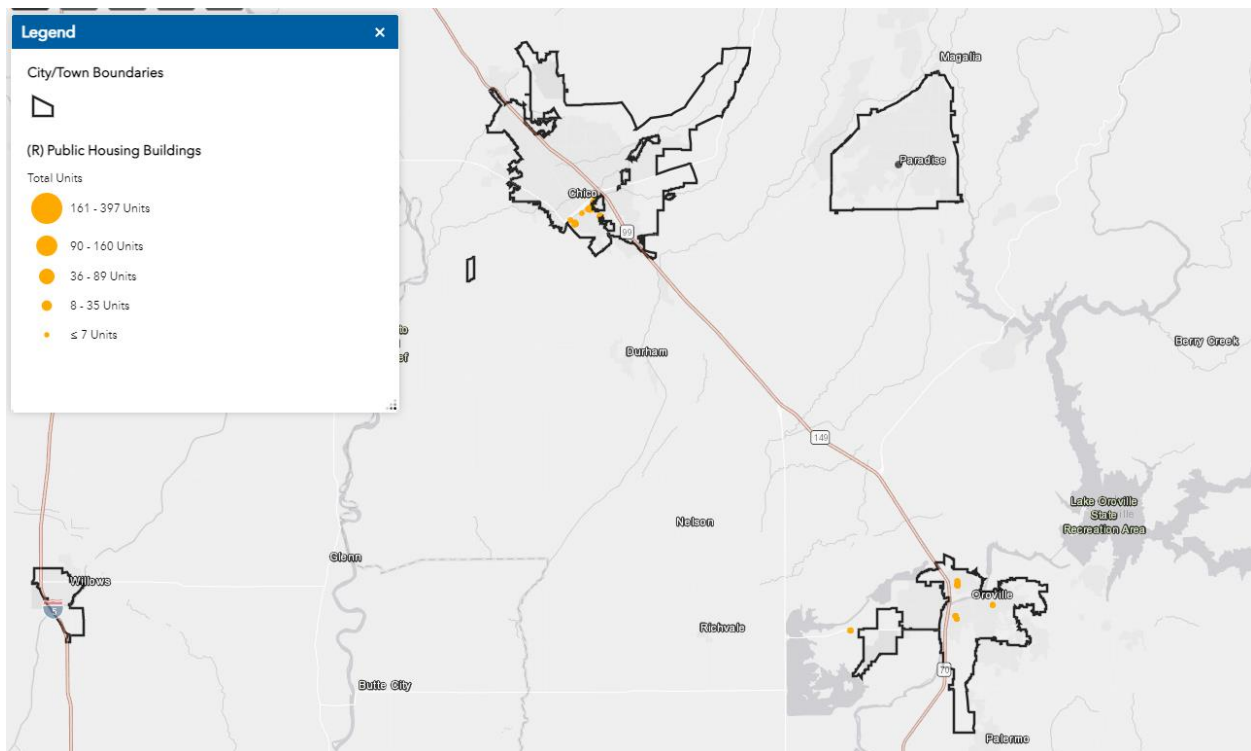
The first topic of the Assessment of Fair Housing is an assessment of the jurisdiction’s fair housing enforcement and outreach capacity. Pursuant to the California Fair Employment and Housing Act [Government Code Section 12921 (a)], the opportunity to seek, obtain, and hold housing cannot be determined by an individual’s “race, color, religion, sex, gender, gender identity, gender expression,

## APPENDIX B

sexual orientation, marital status, national origin, ancestry, familial status, source of income, disability, veteran or military status, genetic information, or any other basis prohibited by Section 51 of the Civil Code.”

### LOCAL AND REGIONAL PATTERNS AND TRENDS

Local and regional patterns and trends are identified through data on public housing buildings and Housing Choice Vouchers in the Town of Paradise, as well as interviews with regional stakeholders whose service areas include the Town. Maps and data tables of public housing buildings and Housing Choice Vouchers in and around Paradise provide information to identify any areas of concentration of affordable housing in the County. Figure 1 depicts the geographic distribution of public housing buildings in the areas surrounding the Town of Paradise. Public housing buildings are those owned and managed by the Housing Authority of the County of Butte, and not other subsidized affordable housing. All public housing buildings in the County are located in the southcentral and southwest parts of the City of Chico and throughout the City of Oroville. While the Town does not operate public housing, the Housing Authority of Butte County bought one site in 2000 that included 12 units (Kathy Court Apartments). This building burned down in the 2018 Camp Fire. The Housing Authority does desire to rebuild, though no rebuild permits have been issued yet.

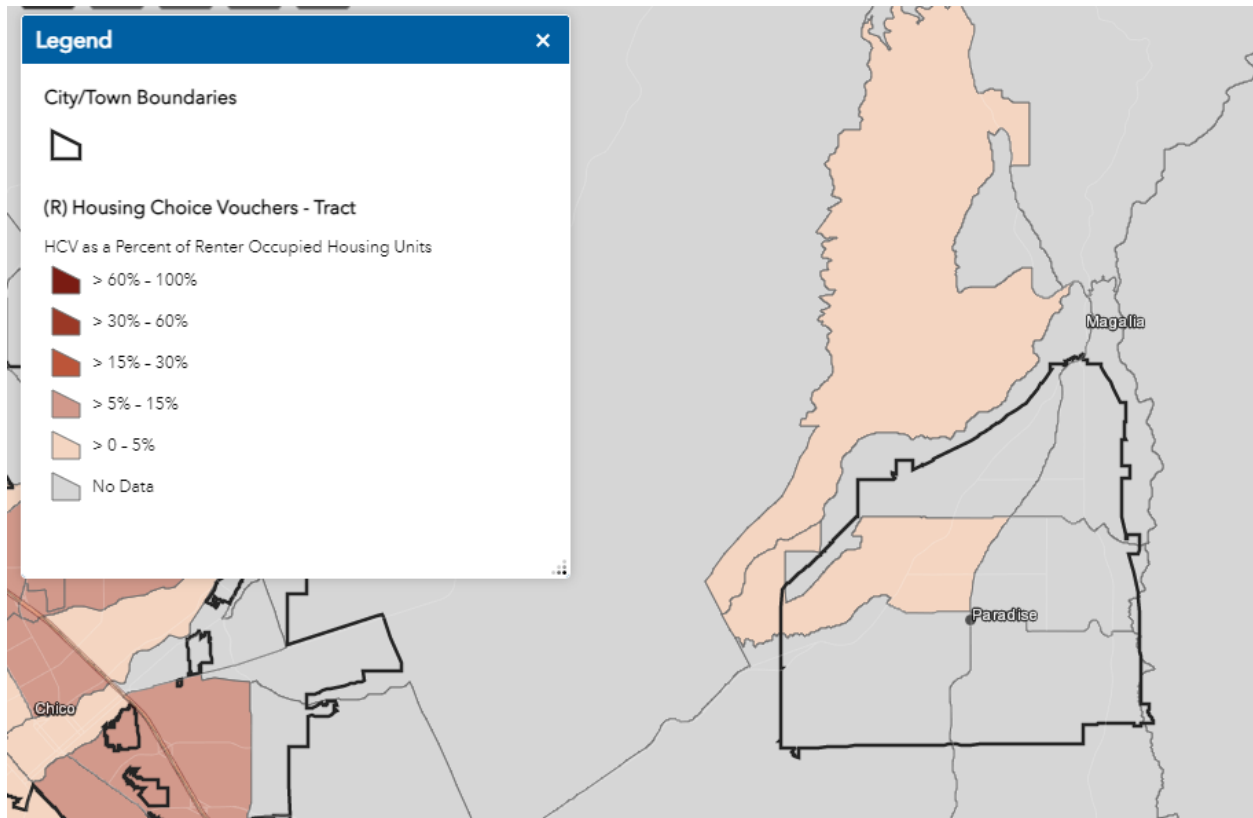


**Figure 1: Regional Public Housing Buildings Map, 2021**

*Source: HCD AFFH Data Resources and Mapping Tool: U.S. Housing and Urban Development*

Figure 2 depicts Housing Choice Vouchers (HCVs) as a percentage of renter occupied housing units in the Town of Paradise. There are no HCVs being used in most parts of the Town, but the census tract

that overlaps with Magalia in the west of Paradise uses HCVs for up to 5 percent of renter occupied housing units. However, the data used to produce this map was collected prior the 2018 Camp Fire.



**Figure 2: Town of Paradise, Housing Choice Vouchers by Census Tract Map, 2021**

Source: HCD AFFH Data Resources and Mapping Tool: U.S. Housing and Urban Development

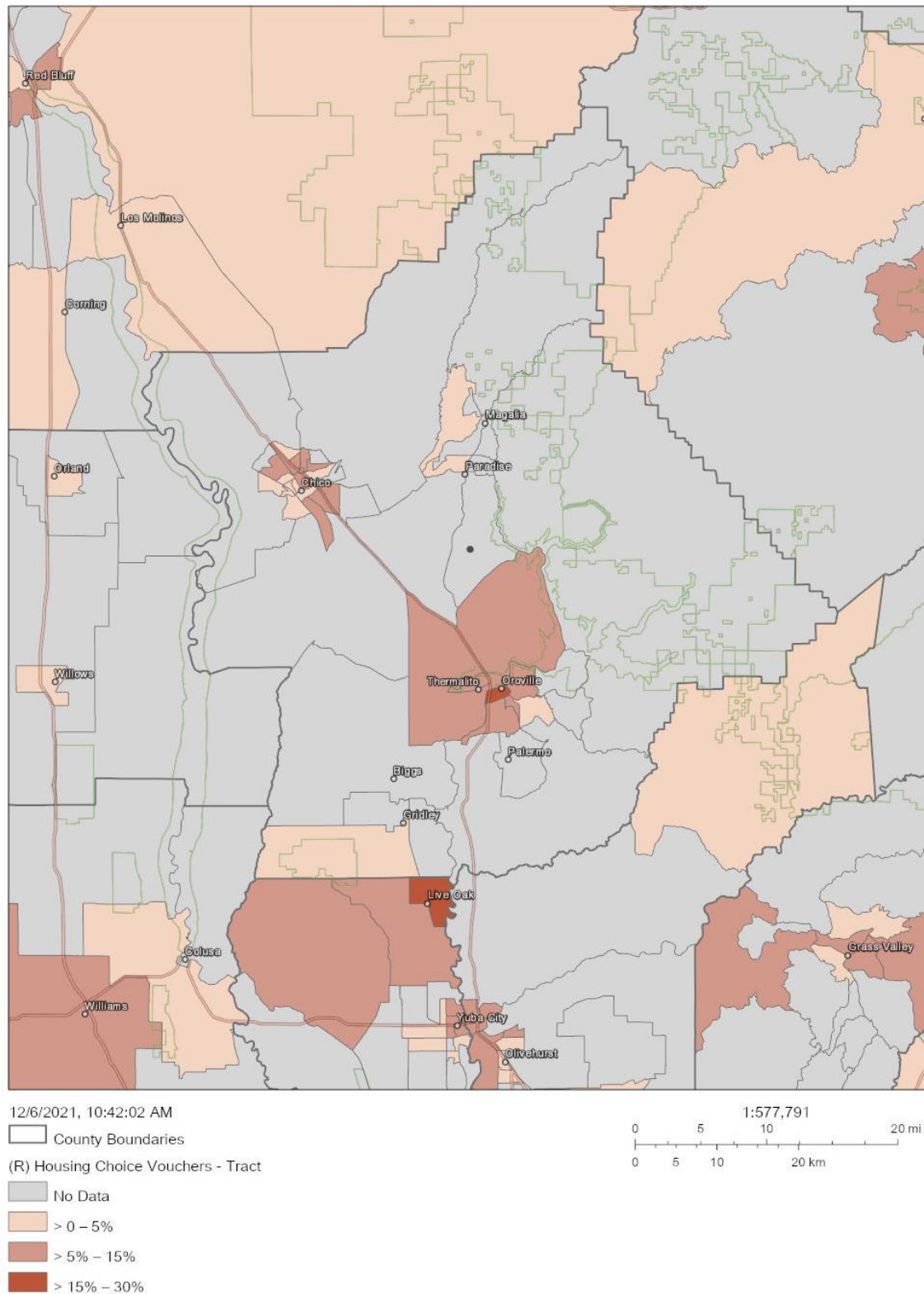
Table 1 shows the number of households who hold Housing Choice Vouchers (HCVs) in the Town of Paradise and Butte County in 2021. HCVs allow very low-income families to choose and rent safe, decent, and affordable privately-owned rental housing. The Housing Authority of the County of Butte reported that it provided a total of 86 HCVs to residents in the Town of Paradise and Magalia. These 86 HCVs make up approximately 5 percent of all the HCVs in use in Butte County as a whole (1,684).

**TABLE 1: TOWN OF PARADISE AND BUTTE COUNTY, NUMBER OF HOUSEHOLDS WITH HOUSING CHOICE VOUCHERS, 2021**

Jurisdiction	Number of Households with Housing Choice Vouchers
Town of Paradise	86
Butte County	1,684

Source: Housing Authority of the County of Butte.

Figure 3 depicts Housing Choice Vouchers (HCVs) as a percentage of renter occupied housing units in Butte County. Much of the unincorporated county does not have data available. Census tracts west of Magalia/Paradise and west of Gridley have 0-5 percent of renter occupied housing units as households with an HCV. Many of the census tracts surrounding Thermalito and Oroville have 5-15 percent of renter



**Figure 3: Butte County, Housing Choice Vouchers by Census Tract Map, 2021**

Source: HCD AFFH Data Resources and Mapping Tool: U.S. Housing and Urban Development



occupied housing units as households with an HCV. The City of Oroville is the only area in the county with 15-30 percent of renter occupied housing units as households with an HCV.

Figure 4 depicts post-fire local data on the location of households using HCVs. Each dot signifies one household. The households utilizing HCVs appear to be spread throughout many parts of the Town and in Magalia, however, there are some clusters around Elliot Road and Buschmann Road in Paradise due to a high concentration of multi-family units in these areas, and in between Imperial Way and Rosewood Drive in Magalia where there are older mobile homes in a fairly dense neighborhood. These areas are likely to have a higher rate of affordable rentals due to the types of homes in the area.

### LOCAL DATA AND KNOWLEDGE

Correspondence with regional stakeholders whose services areas include the Town of Paradise provide qualitative data for analysis.

The Town of Paradise housing programs are funded through State and Federal Grants and bring dollars into the community that not only help residents and improve housing stock, but also support those residents who work in the housing industry, including realtors, lenders, contractors/sub-contractors, and building suppliers.

The Town does not host or sponsor any fair housing workshops due to not having enough of a consumer base post-fire, but does have fair housing enforcement and outreach materials such as brochures and posters available at Town Hall and the Business and Housing office. On the Town's website, [www.townofparadise.com/housing](http://www.townofparadise.com/housing), the Town is currently working to add a section called "Fair Housing and Tenant Information" which will provide resources and information to the community, including COVID-19 eviction information, Legal Services of Northern California's "Fair Housing and You" booklet, Tenants Together tenant foreclosure hotline, a list of protected classes, and more. The Town's webpage will also provide contact information (website and/or phone number) for the following fair housing organizations:

- California Department of Fair Employment and Housing (DFEH)
- Community Legal Information Center (CLIC)
- Disability Action Center
- Housing Authority of the County of Butte (HACB)
- Legal Services of Northern California (LSNC)
- North Valley Property Owners Association (NVPOA)
- Self-Help Assistance & Referral Program (SHARP)
- Sierra North Valley Realtors
- United States Department of Housing and Urban Development (HUD)

Legal Services of Northern California (LSNC) addresses fair housing issues that come up for community members. Fair housing complaints that are brought to the Town's attention are referred to LSNC, who represents low-income individuals and families who are alleging a fair housing violation. Many such cases are resolved with settlement agreements. As appropriate, complaints may be further referred to the Federal Office of Fair Housing and Equal Opportunity, or the State of California Fair Housing & Employment Commission.

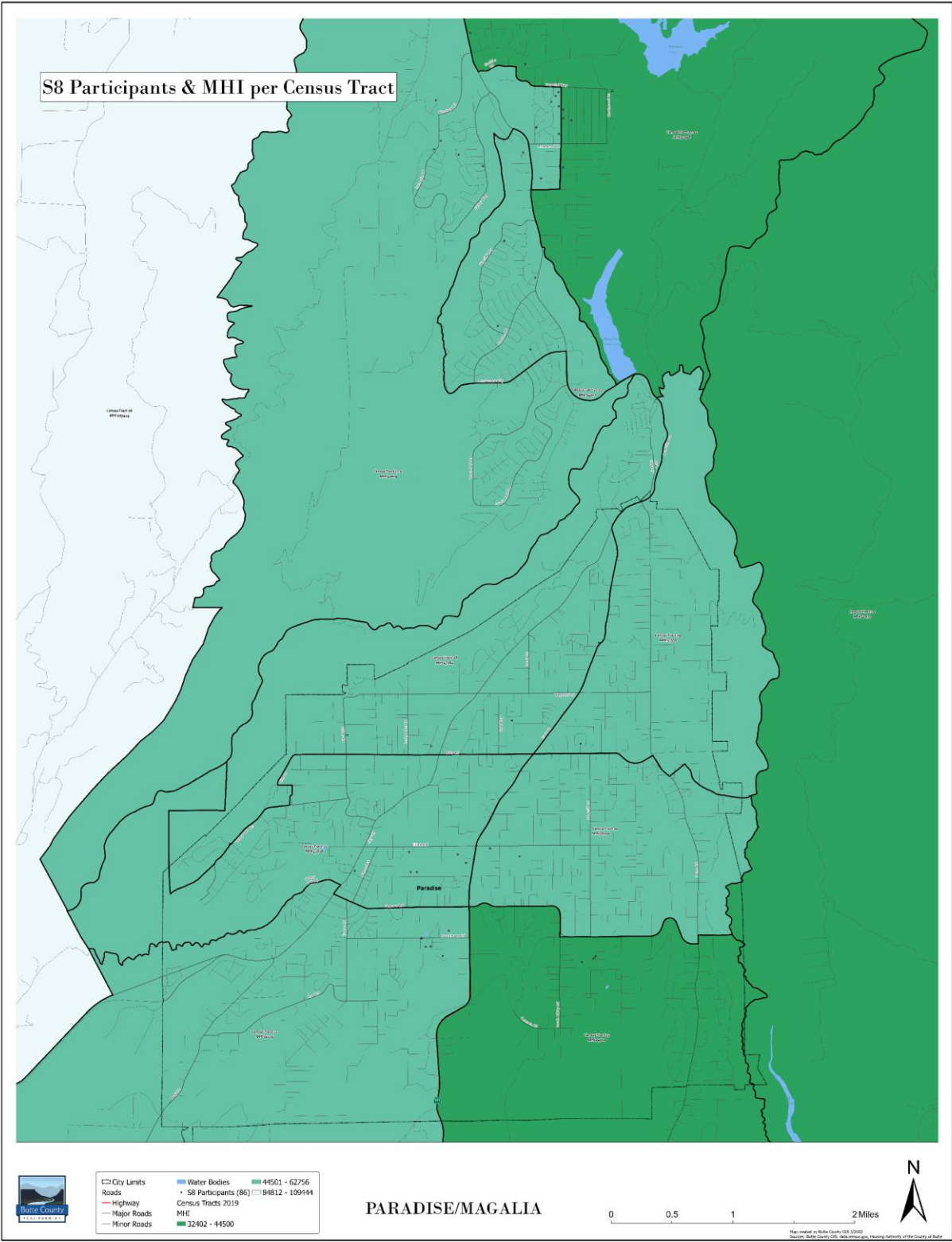


Figure 4: Section 8 Households and MHI Per Census Tract, March 2022

Source: Housing Authority of Butte County

One complaint has been reported post-fire to the Town by the United States Department of Housing and Urban Development (HUD) due to the Town's federal and state housing programs being only for owners, not renters. Prior to the 2018 Camp Fire, the Town had not received any other complaints from HUD. The Town is not aware of any HUD findings of violation of the Fair Housing Act in any publicly funded housing or housing related activities in the Town. The Town will continue to work with housing and legal providers in the jurisdiction, primarily LSNC and the Housing Authority of the County of Butte (HACB), to determine if any such findings have occurred without the Town's knowledge.

### CONCLUSIONS AND SUMMARY OF ISSUES

In conclusion, while there are no public housing buildings in Paradise post-fire and not very many households who utilize Housing Choice Vouchers, those who are appear evenly spread throughout the Town and surrounding areas, despite some clustering in areas where multi-family units are more prevalent. Complaints about housing discrimination in the Town have not been an issue, but the Town is being proactive about adding fair housing programming and resources to its website and working with local organizations who provide these services.

## B. SEGREGATION AND INTEGRATION

The second topic of the Assessment of Fair Housing is an assessment of segregation and integration in the jurisdiction. According to *HCD's Affirmatively Furthering Fair Housing Guidance Memo*, segregation generally means a condition in which there is a high concentration of people of a particular race, color, religion, sex, familial status, national origin, or disability in a particular geographic area when compared to a broader geographic area. This section discusses levels of segregation and integration for race and ethnicity, language, familial status, persons with disabilities, and income, and identifies the groups that experience the highest levels of segregation.

### LOCAL AND REGIONAL PATTERNS AND TRENDS

Data tables, narrative, local knowledge, and maps are used to illustrate local and regional patterns and trends regarding segregation and integration for race and ethnicity, language, familial status, persons with disabilities, and income.

The Paradise Ridge was established as a permanent settlement during the gold rush era and has transformed over time from mining to subsistence farming, to logging and agriculture, to modest retail trade. Today, it is primarily a residential community. The discovery of gold led to a predominantly Anglo settlement, which remains the main demographic of the population that exists in the Town today.<sup>1</sup> However, according to observations from Town staff, the rebuilding process after the 2018 Camp Fire has led to the population becoming more diverse.

### Race and Ethnicity

Table 2 depicts race and ethnicity for Paradise and Butte County in 2010 compared to the 2019 Census data for the County and the 2021 Town of Paradise Local Census Survey. Assuming the Town's

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<sup>1</sup> McDonald, Lois, 2000. "This Paradise We Call Home." Gold Nugget Museum.

TABLE 2: TOWN OF PARADISE AND BUTTE COUNTY, RACE AND ETHNICITY TRENDS OVER TIME

Race or Ethnicity	Town of Paradise					Butte County				
	2010		2021		2010-2019	2010		2019		2010-2019
	Number of Persons	Percent of Total Population	Number of Persons	Percent of Survey Respondents	Potential Change	Number of Persons	Percent of Total Population	Number of Persons	Percent of Total Population	Potential Change
Hispanic/Latino (of any race)	1,833	7.0%	--	7.1%	+0.1%	29,512	13.5%	36,916	16.3%	+2.8%
White, not Hispanic/Latino	22,909	86.9%	--	86.4%	-0.5%	166,463	76.1%	162,537	72.0%	-4.1%
Black or African American, not Hispanic/Latino	81	0.3%	--	1.2%	+0.9%	3,012	1.4%	3,342	1.5%	+0.1
American Indian and Alaska Native, not Hispanic/Latino	86	0.3%	--	3.2%	+2.9%	2,050	0.9%	1,669	0.8%	-0.1%
Asian, not Hispanic/Latino	353	1.3%	--	2.1%	+0.8%	8,658	4.0%	10,057	4.5%	+0.5%
Some other Race, or Two or More Races	1,089	4.1%	--	0.0%	-4.1%	8,940	4.1%	11,266	4.9%	+0.8%
<b>Total</b>	<b>26,351</b>	<b>100%</b>	<b>4,485</b>	<b>100%</b>	<b>-82.8%</b>	<b>218,635</b>	<b>100%</b>	<b>225,817</b>	<b>100%</b>	<b>+3.3%</b>

Source: U.S. Census 2006-2010 and 2015-2019 American Community Survey.



survey reflects similar demographic trends as the total population, the Town experienced an increase in the proportion of American Indian and Alaskan Native residents, and a decrease of residents who selected other race or multiple races. The County overall has experienced an increase of Hispanic/Latino residents and a decrease of White, not Hispanic/Latino residents. All other changes in the racial and ethnic makeup of the jurisdictions were less than 1 percent.

Figure 5 depicts racial demographics in Butte County in 2018 prior to the Camp Fire. The map shows the total percentage of the non-White population (i.e., people of color) by block group by subtracting the total White population from the reported population total. The darker the color on the map, the higher the concentration of the non-White population. For a jurisdiction such as Butte County with relatively low racial and ethnic diversity compared to the State of California, depicting the non-White population as a whole can better illustrate areas of greatest racial and ethnic diversity. Compared to Figure 6, which shows the same information as of 2010, the County has become more diverse, but most of the growth of the non-White population has been concentrated in the area between Chico and Gridley.

Figure 7 depicts racial demographics in Paradise in 2018 prior to the Camp Fire. Almost every census tract that makes up the Town has less than 20 percent non-White population, except for downtown in the area bounded by Bille Road to the north, Clark Road to the east, Pearson Road to the south, and Skyway to the west. This area has a slightly increased non-White population of 22.6 percent non-White in the northern half of downtown and 20.3 percent non-White in the southern half of downtown. The small increase in racial diversity in this area is not substantially different from the rest of town, but it could be due to the relatively greater amount of multi-family buildings in and around downtown compared to other parts of town or the fact that this was an older area of town with older housing stock pre-fire. The growing diversity in downtown is a change from 2010, shown in Figure 8, where none of the Town had a non-White population over 20 percent.

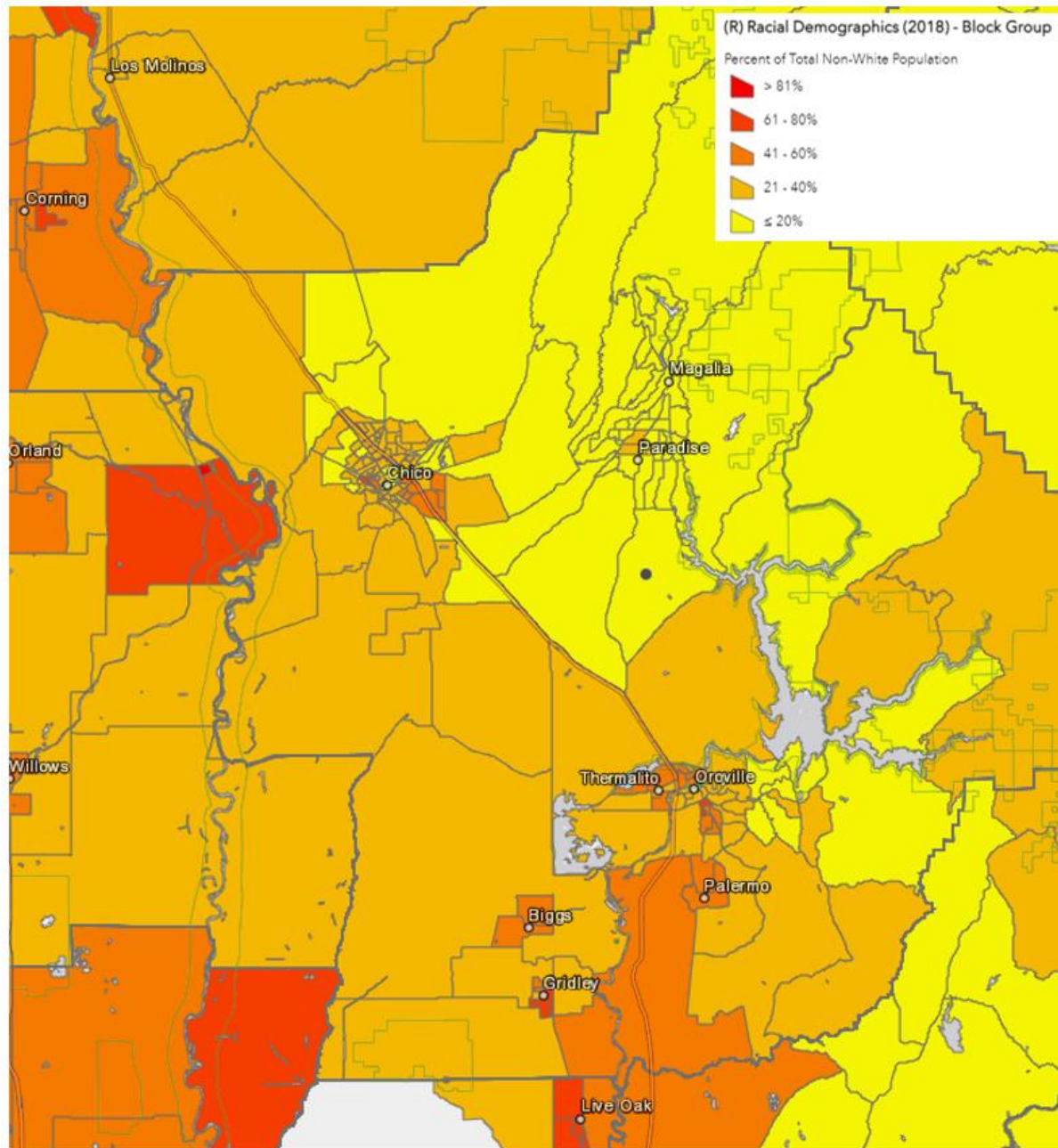
In the rebuilding completed to date, Town staff have reported that all new housing has been evenly dispersed in size and type. There are no single neighborhoods or areas of town where BIPOC populations are concentrated. As the town continues to rebuild, it is anticipated that multi-family buildings will continue to be located downtown near services and bus transit, especially with the proposed sewer that will allow denser projects in this area of town. This could lead to trends of continued diversity in this area.

## Language

In 2018 prior the Camp Fire, 6 percent (174 residents) of the Town's population 5 years and over spoke English "Not well" or "Not at all," and in Butte County the proportion was 7 percent (5,358 residents). While the Town does not have exact post-fire data to compare this to, 8 respondents (0.7 percent) of the 2021 Town of Paradise Local Census Survey selected Spanish as their Primary Language and another 8 (0.7 percent) selected Other. In Butte County, the percentage of people who spoke a language other than English at home increased and the number of persons over 5 years of age who are not fluent in English decreased.

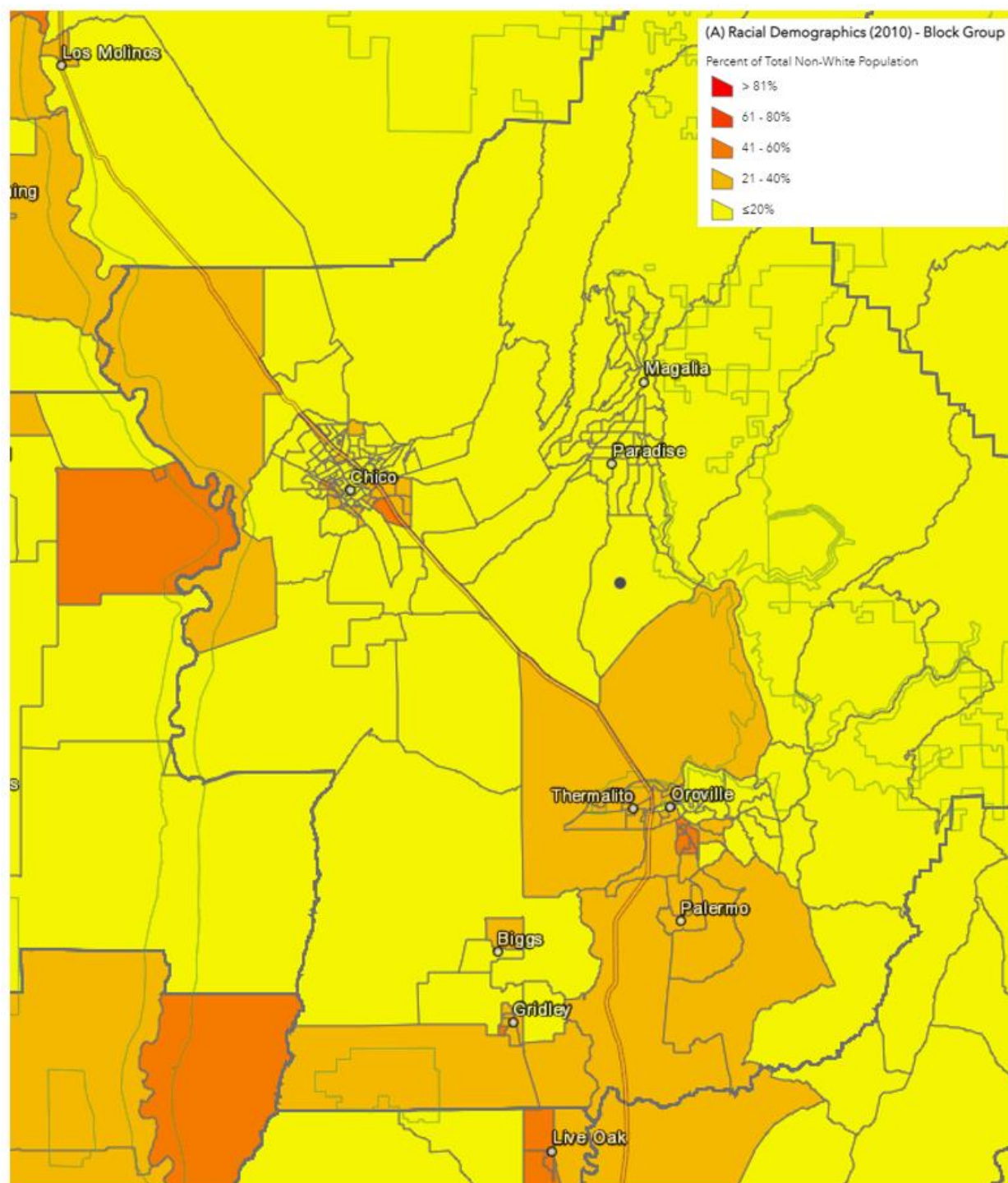
The percentage of non-English speakers in the town is very small and Town staff are not aware of any linguistic enclaves either pre- or post-fire.





**Figure 5: Butte County, Non-White Demographics Map, 2018**

Source: HCD AFFH Data Resources and Mapping Tool: Esri



**Figure 6: Butte County, Non-White Demographics Map, 2010**

Source: HCD AFFH Data Resources and Mapping Tool: Esri



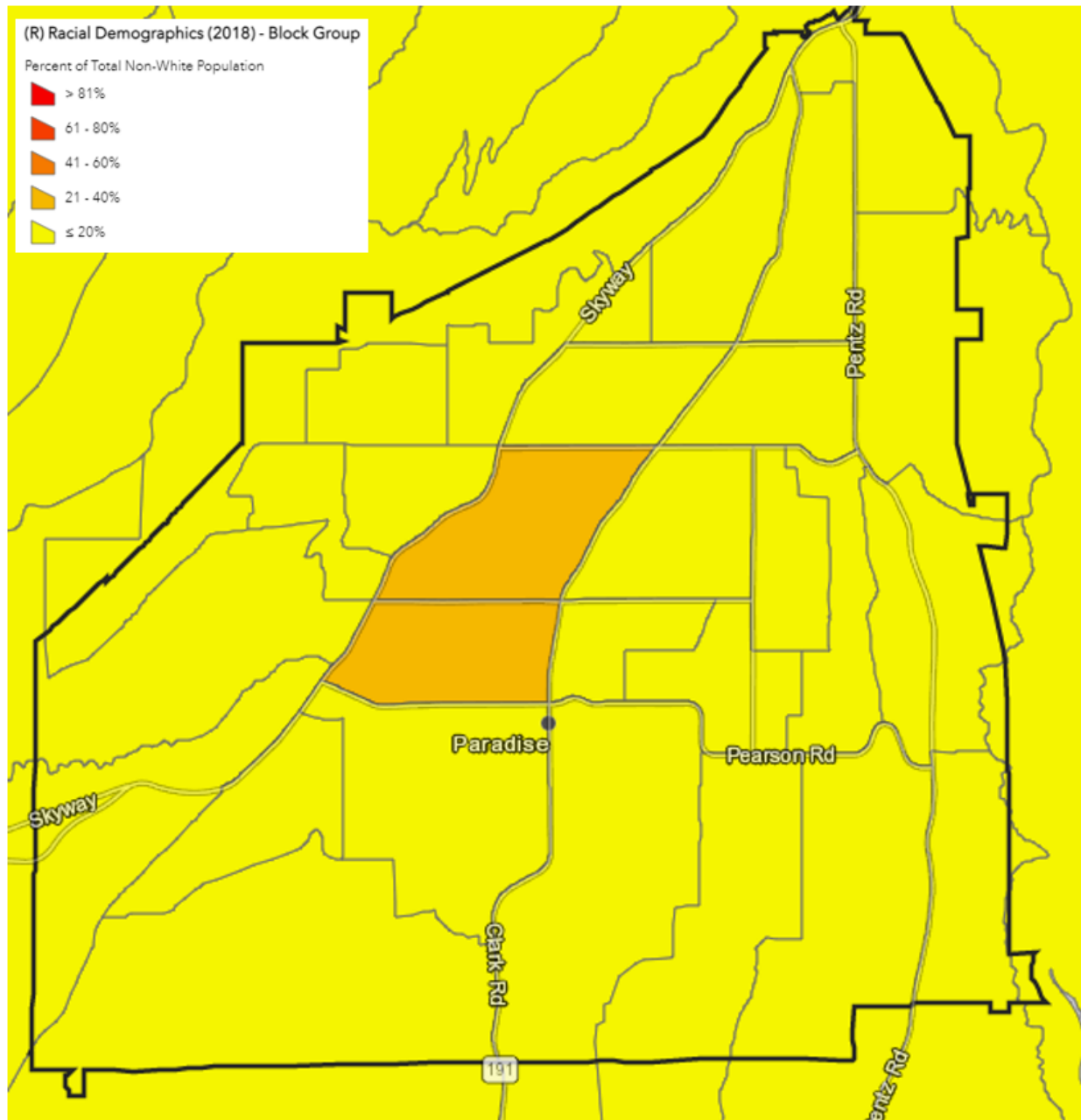
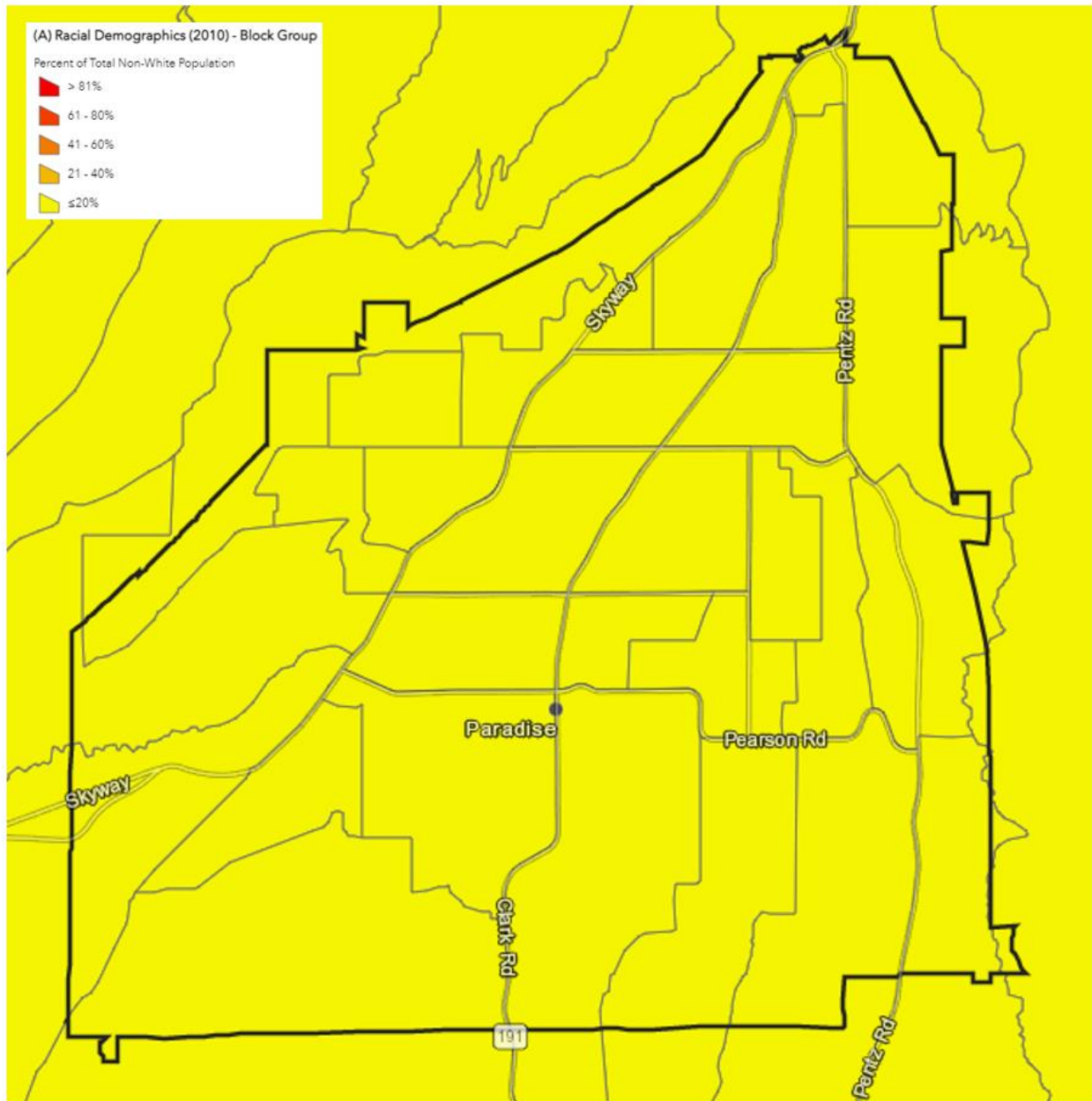


Figure 7: Town of Paradise, Non-White Demographics Map, 2018

Source: HCD AFFH Data Resources and Mapping Tool: Esri



**Figure 8: Town of Paradise, Non-White Demographics Map, 2010**

Source: HCD AFFH Data Resources and Mapping Tool: Esri

**Familial Status**

Figure 9 shows the percentage of children living in single parent, female-headed households in Butte County. The only census tract in Butte County that has 40-60 percent of children living in single parent female households is located in Chico. The census tracts west of Oroville/Thermalito and Gridley as well as north of Paradise and Magalia have 20-40 percent of children living in single parent, female households, but it must be noted that this data does not reflect post-fire conditions. The remaining census tracts in the County have 20 percent or fewer children living in single parent female households.

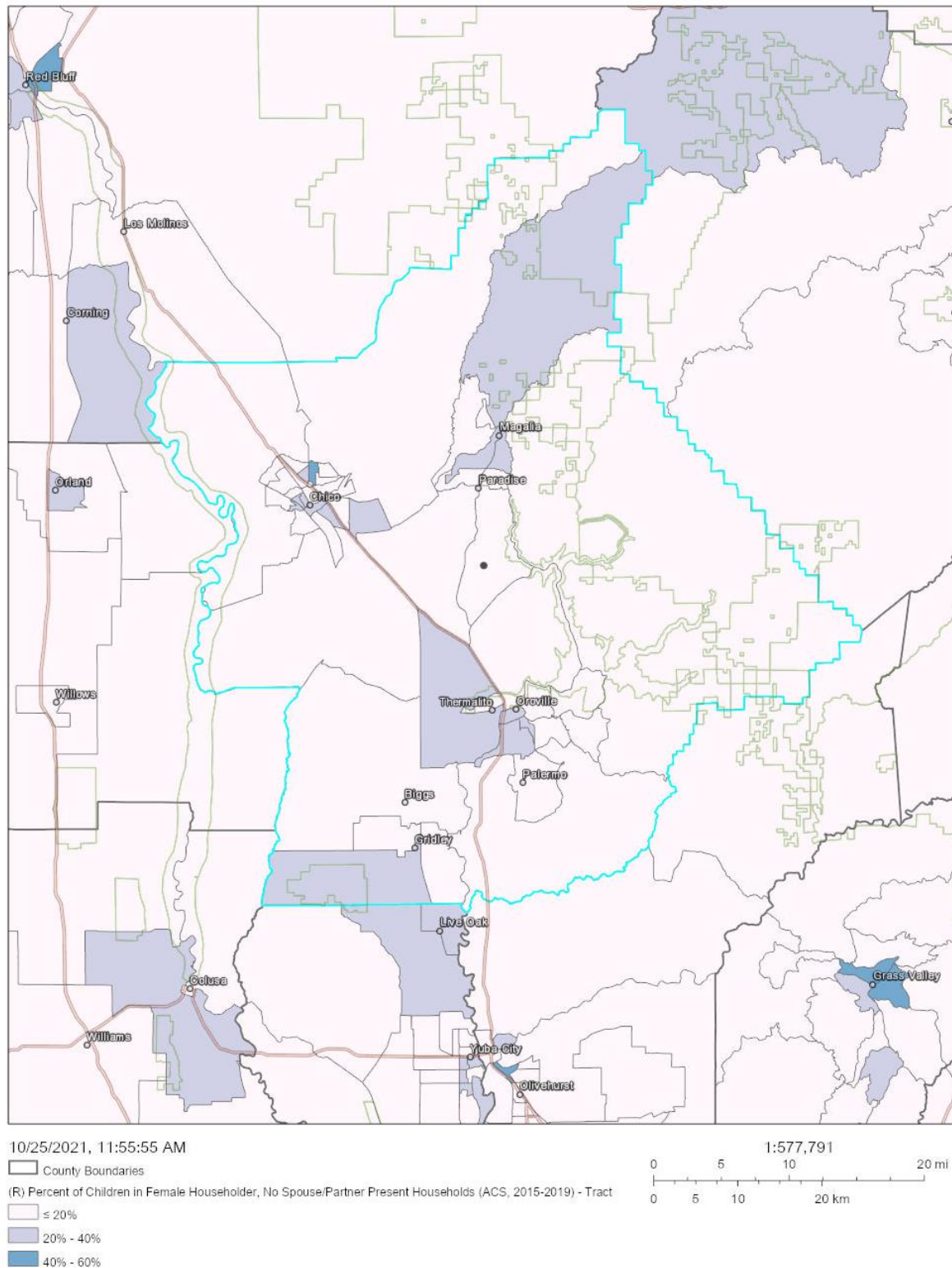
The pre-fire maps show greater concentrations of female-headed households in northern Paradise than the rest of town. In general, Town staff are aware that single parent households typically live in multi-family buildings in Paradise, but there are not known concentrations of neighborhoods or areas where female-headed households live.

A different way of looking at single parent households is looking at the distribution of children living in married couple households. Figure 10 shows the percentage of children living in married couple households in Butte County according to the 2015-2019 Census estimates (pre-fire data). The census tracts with more than 80 percent of children living in married couple households are mostly located in north Butte County around the city of Chico. Portions of Butte Valley, east Gridley, and east Oroville also have more than 80 percent of children living in married couple households. Eastern Butte county north of Oroville and east of Paradise and Magalia has mostly 20-40 percent of children living in married couple households.

In Paradise, the pre-fire maps show fewer children in married-couple households in northern Paradise. Southeastern Paradise and downtown Paradise had the highest concentrations of children in married-couple households.

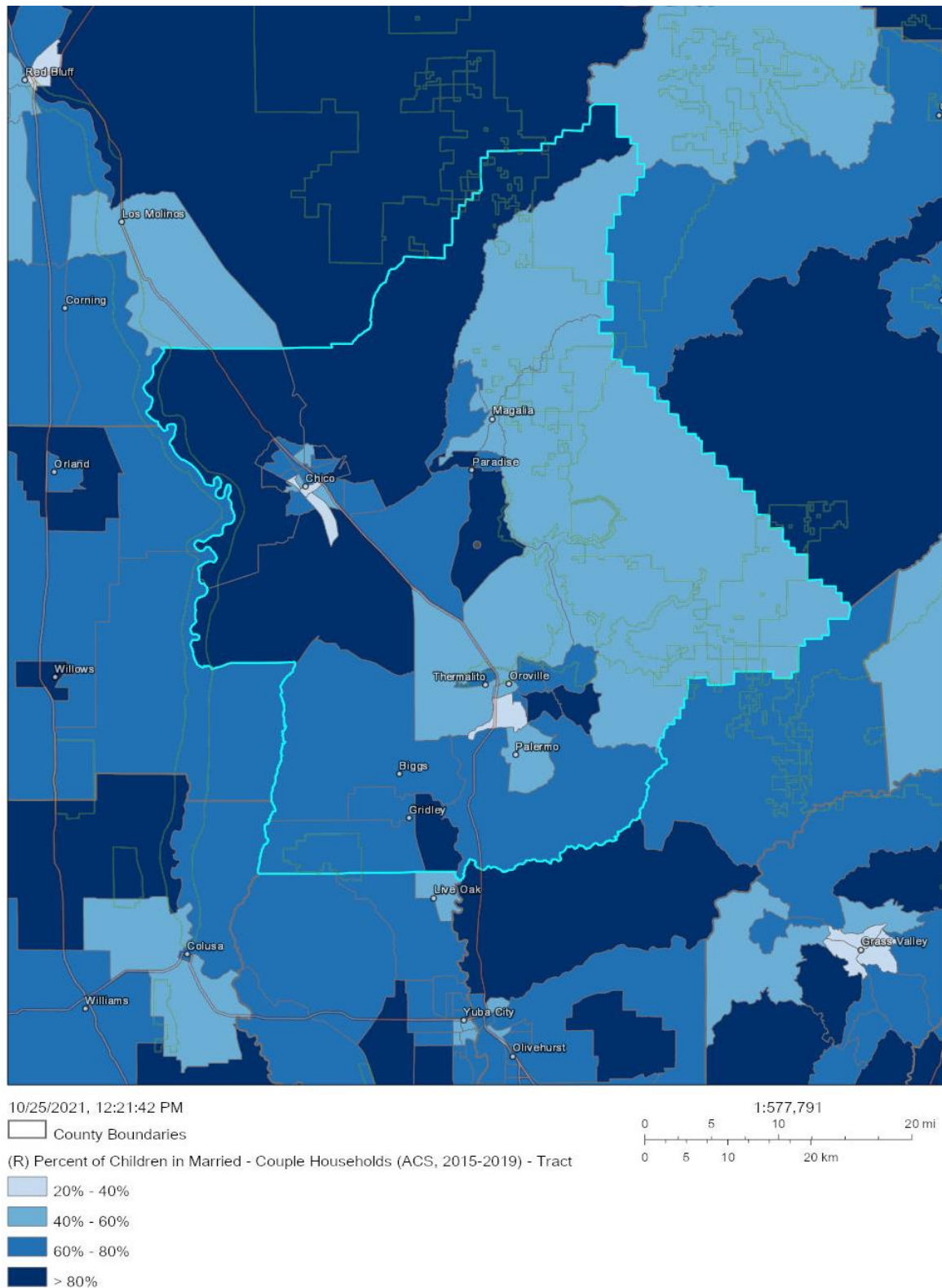
**Persons with Disabilities**

When it comes to housing, people with disabilities are not only in need of affordable housing but accessibly designed housing, which offers greater mobility and opportunity for independence. Unfortunately, the need typically outweighs what is available. People with disabilities are at a high risk for housing insecurity, homelessness, and institutionalization, particularly when they lose aging caregivers. Paradise is home to a large population of persons with disabilities; 18 percent of people in the town have a disability of any kind (compared with 7 percent statewide). Data on developmental disabilities shows that the most common living arrangement for individuals with developmental disabilities in Paradise is the home of parent/family/guardian. This could be why persons with disabilities were equally spread out throughout the town before the fire, as shown in Figure 11. Almost all census tracts in Paradise had 20-30 percent of the population identify as having a disability. California Vocations had housing for persons with disabilities on upper Clark Road, but this was lost in the fire. There are no known housing projects for persons with disabilities post-fire.



**Figure 9: Butte County, Percent of Children in Single Parent Female Households Map, 2019**

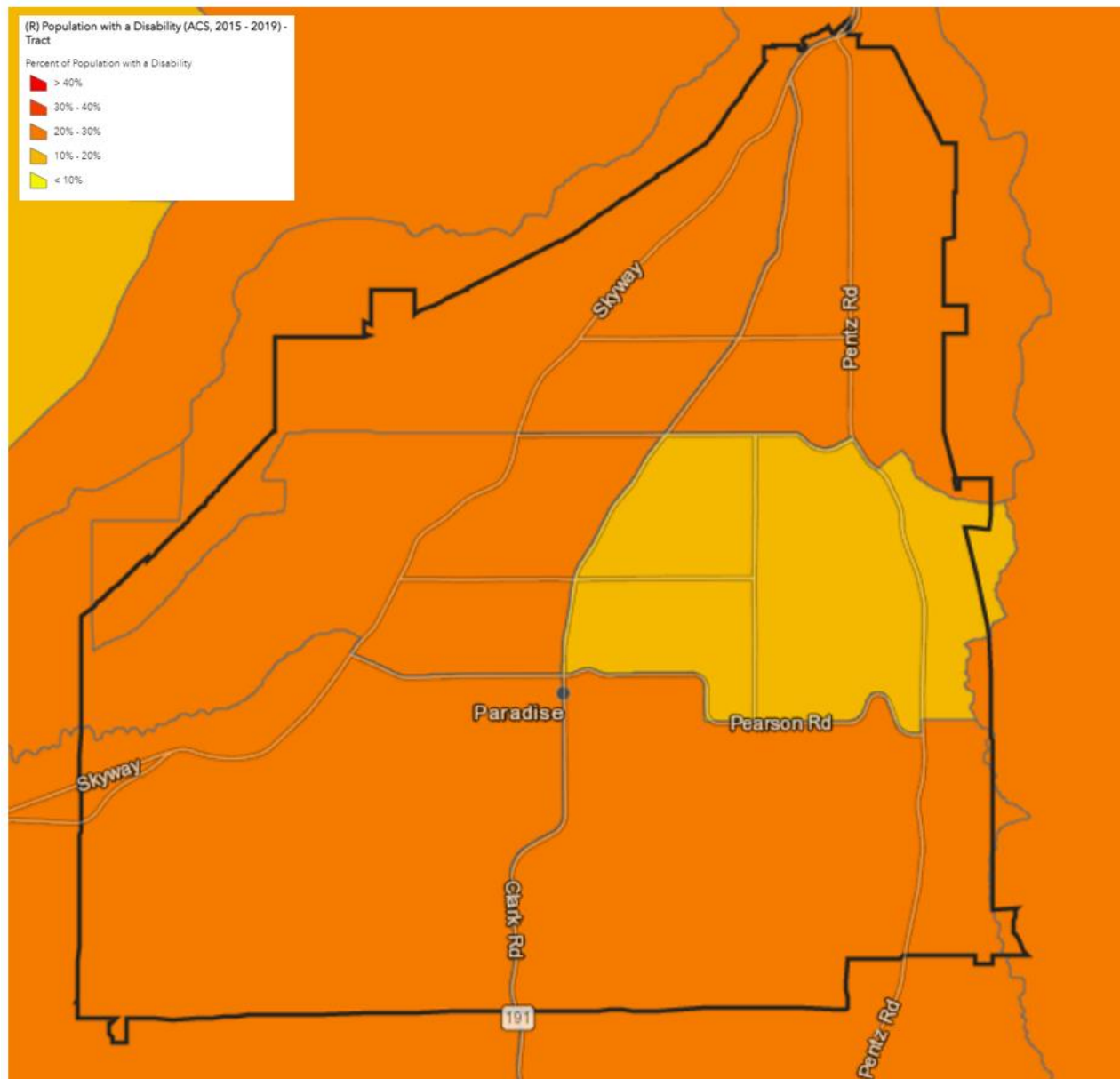
Source: HCD AFFH Data Resources and Mapping Tool: 2015-2019 American Community Survey



**Figure 10: Butte County, Percent of Children in Married Couple Households Map, 2019**

Source: HCD AFFH Data Resources and Mapping Tool: 2015-2019 American Community Survey

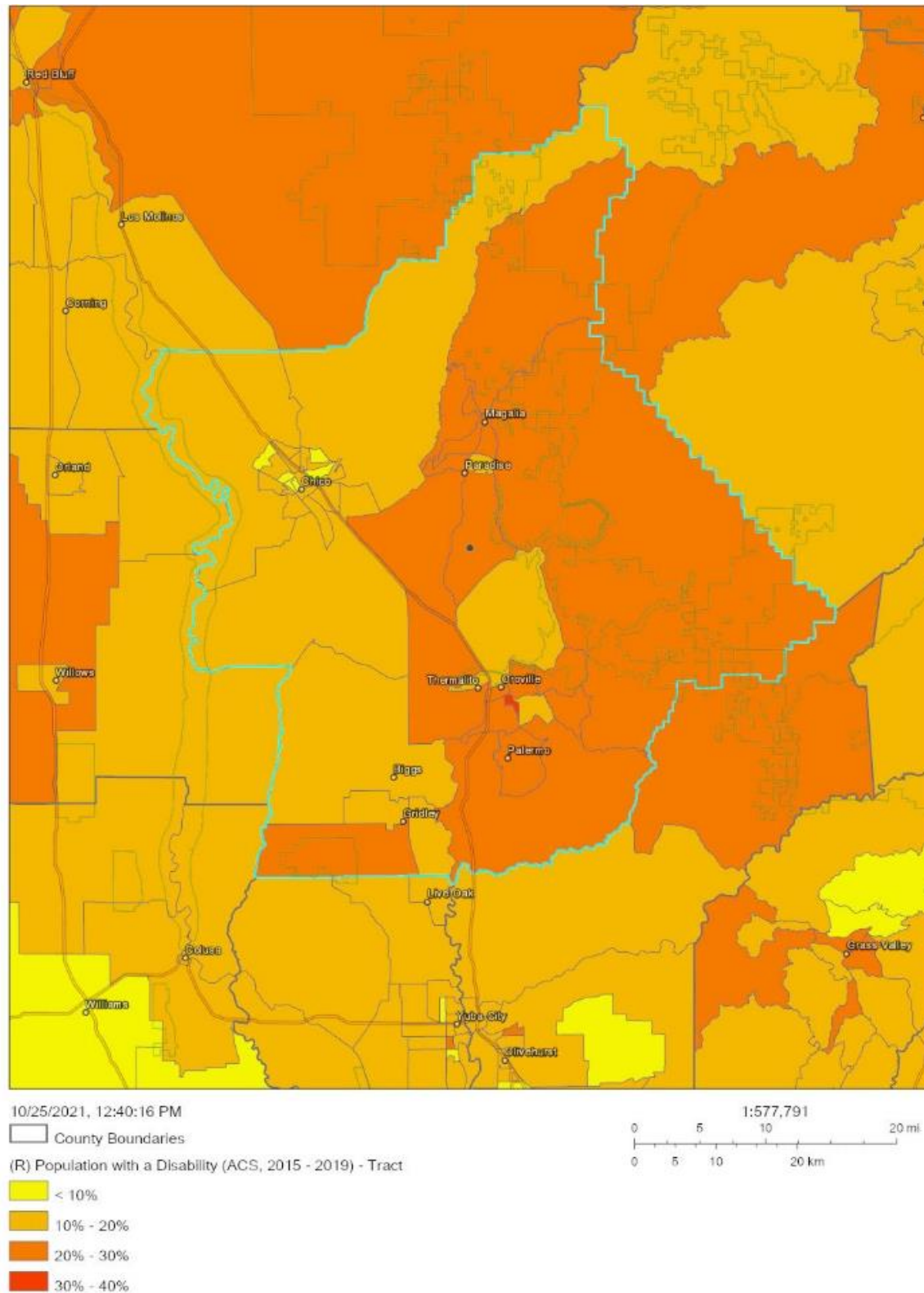




**Figure 11: Town of Paradise, Percent of Population with a Disability, 2019**

*Source: HCD AFFH Data Resources and Mapping Tool: 2015-2019 American Community Survey*

Figure 11 shows the percentage of the population that has a disability in a given census tract in Butte County in 2019. Generally, an estimated 10-20 percent of western Butte County's population has a disability compared to 20-30 percent of eastern Butte County. Only the City of Chico has census tracts with less than 10 percent of the population with a disability. Only the City of Oroville has a census tract with 30-40 percent of the population with a disability. Figure 12 shows the percentage of the population with a disability in Paradise using pre-fire data.

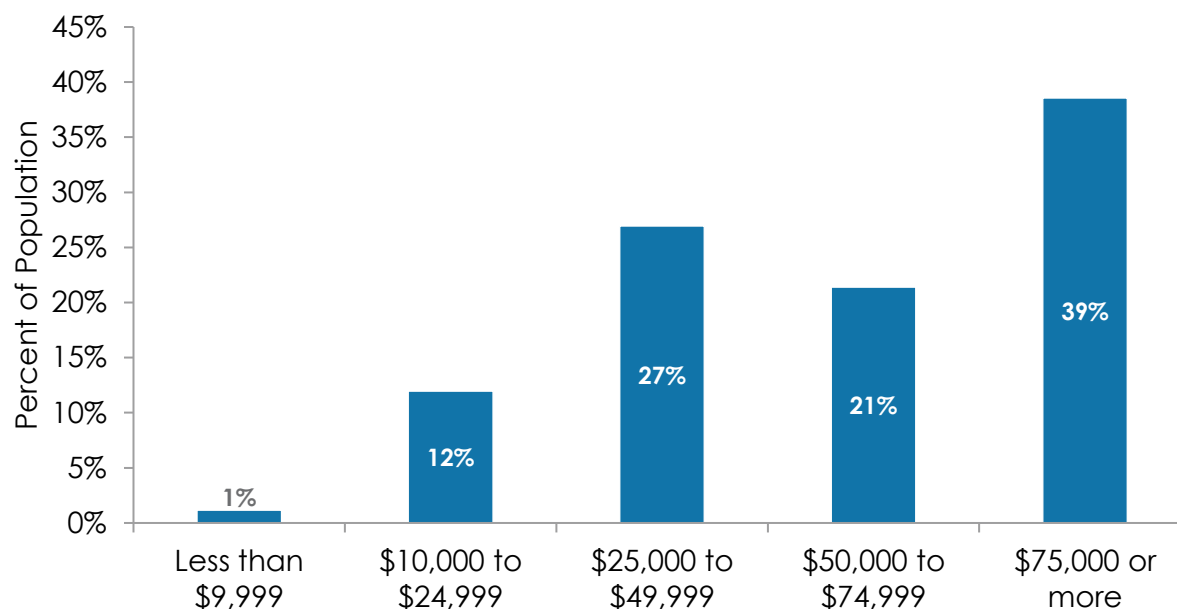


**Figure 12: Butte County, Percent of Population with a Disability, 2019**

Source: HCD AFFH Data Resources and Mapping Tool: 2015-2019 American Community Survey

## Income

While there is not accurate quantitative data on what parts of the Town may have higher or lower incomes, Figure 13, from the Town of Paradise Local Census Survey of 2021, shows a breakdown of different wage groups across the Town as a whole, offering additional insight into local dynamics since the fire.<sup>2</sup> As shown in Figure 8, most respondents to the local census recorded incomes of \$75,000 or more, followed by incomes between \$25,000 and \$49,999. This is consistent with pre-fire (2015-2019 ACS) data indicating a median income of \$51,566.



**Figure 13: Household Income**

Source: Town of Paradise Local Census Survey 2021.

For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-10.

Town staff have reported that higher-income households are primarily located in West Canyon (e.g., Valley Ridge Drive) and Southeast Canyon (e.g., Malibu Drive/Country Club area). In addition, two of the three buildings with existing or planned deed-restricted housing units are located within the same census tract, Paradise Community Village at 1001 Village Parkway and Paradise Gardens III, which is in the rebuilding process, at 1040 Buschmann Road. These two buildings are west of Clark Road and within a 15-minute walk of bus service at the intersection of Clark Road and Pearson Road. Although these two projects could contribute to a concentration of low-income households in one part of town, this is a part of town with access to services and is anticipated to become a more mixed-income and walkable area with the sewer proposal. Furthermore, manufactured housing represents a source of affordable housing in Paradise and is evenly distributed throughout town. Town staff have reported that the rebuilding process has resulted in a fairly even distribution of building types throughout the entirety of town and they have not seen the creation of new low-income neighborhoods.

<sup>2</sup> The source table is top coded at \$75,000, precluding more fine-grained analysis at the higher end of the wage spectrum.



### LOCAL DATA AND KNOWLEDGE

Local data and knowledge on segregation and integration is provided by interviews with California Vocations, Inc. (CVI), Community Housing Improvement Program (CHIP), and local Town staff.

Prior to the Camp Fire, CVI had over 20 supportive living homes owned by community member landlords that CVI provided staffing for, typically with five beds or less and each person having their own bedroom. This model allowed persons with disabilities to be scattered through the town in a way that CVI said was ideal because it supported the independence of their clients to have a home of their own in the community like any other house. CVI also had a residential facility on Upper Clark near the intersection of Clark Road and Cypress Lane that included three residential buildings, a small office, and multi-purpose building. The largest residential building was licensed for 20 people, and the other two buildings for six people. CVI's property was destroyed in the fire, and they used insurance money to buy replacement housing throughout Butte County (primarily in Gridley and Oroville). They currently serve approximately 45 individuals across the county, typically in 2- or 3-bedroom houses.

Interviews with CVI indicate that their clients want to move back to Paradise, but there is not housing for them. CVI is currently looking at three potential sites where they could rebuild housing, but they would need to secure funding to do so: 1620 Cypress Lane, 1930-34 Dean Road, or 565 Pearson Road. The Cypress Lane and Dean Road locations are in northern Paradise, while the Pearson Road location is closer to the downtown core and would be within the Sewer Service Area. CVI is considering a little village of duplex type units and a community center in their project.

CVI is unsure whether their scattered living model will return to Paradise after the fire given that they think people who are rebuilding will want that investment for themselves rather than renting the property. However, CDBG-DR funds can be dispersed among multiple properties, so it is something CVI is interested in exploring. CVI also mentioned the possibility of selling their location on Cypress Lane and buying smaller sites throughout town. Regardless of the location or model of a potential future residential facility/facilities, rebuilding housing for persons with disabilities in Paradise is not anticipated to contribute to segregating persons with disabilities because State-licensed homes must be five bedrooms or less and CVI is most interested in providing homes in quiet neighborhoods that blend into the community given behavioral challenges of their clients and the desire to achieve independence for their clients. CVI is also working with the Butte County Housing Authority to obtain vouchers for clients.

Affordable housing developers are most constrained by the town's septic system, which severely constrains allowed densities, as discussed in Chapter 3, Constraints, and obtaining insurance for new construction. In addition, projects may struggle to secure tax credits given uncertain access to amenities while the town rebuilds. The sewer system could open up opportunities for building deed-restricted affordable housing because it will allow increased densities up to 30 units/acre. This could lead to concentrations of affordable housing and special needs housing primarily in the sewer service area. However, the sewer service area is large (1,500 parcels) and coincides with parts of town that have greater access to transit and services and are well-served by evacuation routes. As this area is built out, it is anticipated to have greater access to opportunity and to provide mixed-income and special needs housing through density bonuses and development incentives (see Programs HI-3 and HI-7). In addition, new multi-family buildings will have to comply with current Americans with Disabilities Act (ADA)

requirements, which will increase the town's supply of accessible housing stock compared to the older pre-fire buildings. Finally, manufactured housing provides naturally occurring affordable housing in Paradise, which helps ensure that housing options for lower-income households are not confined to multi-family properties. The Town allows stick-built, modular, and manufactured housing in all residentially zoned areas.

Paradise's population continues to be largely English-speaking and White, although it has seen some diversification in the years before the fire and in the rebuilding process. As previously mentioned, Town staff have not observed rebuilding patterns that would contribute to racial or economic segregation. Instead, they have reported that a variety of building types have returned, and they have been spread throughout the town; no low-income neighborhoods, linguistically isolated communities, or areas of racial segregation have shown themselves post-fire. The Fair Housing Action Plan at the end of this report includes programs to facilitate integrated living patterns as the town continues to rebuild and change.

### OTHER RELEVANT FACTORS

As the Town continues to rebuild, stakeholders cited a chicken or the egg situation where affordable housing and special needs housing may be reluctant to return to the town until more services are available. The Far Northern Regional Center was cited as a specific catalyst that could help people with disabilities return to the Ridge. Stakeholders mentioned that it is not just housing that will create a more livable and thriving Paradise for special needs groups, but retail, sidewalks, transportation options, medical care, and job options.

### CONCLUSIONS AND SUMMARY OF ISSUES

Paradise is primarily made up of a White, English-speaking population and therefore does not experience segregation in terms of race or languages spoken within the town. However, there have been slight increases in the non-White population in recent years before the fire and according to local town staff active in rebuilding. There is the potential for some economic segregation as Town staff have identified pockets of wealth on the eastern and western edges of town and the sewer project is intended to accommodate the majority of future multi-family housing. However, the market rate rents in Paradise are sometimes equivalent to low-income (80 percent AMI) rents and manufactured housing continues to be a source of affordable housing in Paradise that is dispersed throughout the town. As the town continues to rebuild and change, fair housing programs will work to facilitate greater integration.

## C. RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY (R/ECAP)

The third topic of the Assessment of Fair Housing is an assessment of racially and ethnically concentrated areas of poverty (R/ECAP) in the jurisdiction. As detailed in the guidance from HCD, this assessment also separately evaluates significant concentrations of poverty, concentrations of Black, Indigenous, and people of color (BIPOC) populations, and concentrations of affluence at regional and local levels.

## LOCAL AND REGIONAL PATTERNS AND TRENDS

Maps and narrative are used to illustrate local and regional patterns and trends regarding R/ECAPs. HUD developed a census tract-based definition of R/ECAPs which consists of a racial/ethnic concentration threshold and a poverty test. For more urban areas, R/ECAPs must have a non-White population of 50 percent or more whereas for more rural areas the threshold is 20 percent. The poverty test is 40 percent or three or more times the average tract poverty rate for the area. Census tracts that meet both the racial/ethnic concentration threshold and the poverty test are deemed R/ECAPs. The most recent data available to determine R/ECAPs is from 2013. As shown in Figure 14, there are no HUD-defined R/ECAP areas in Butte County.

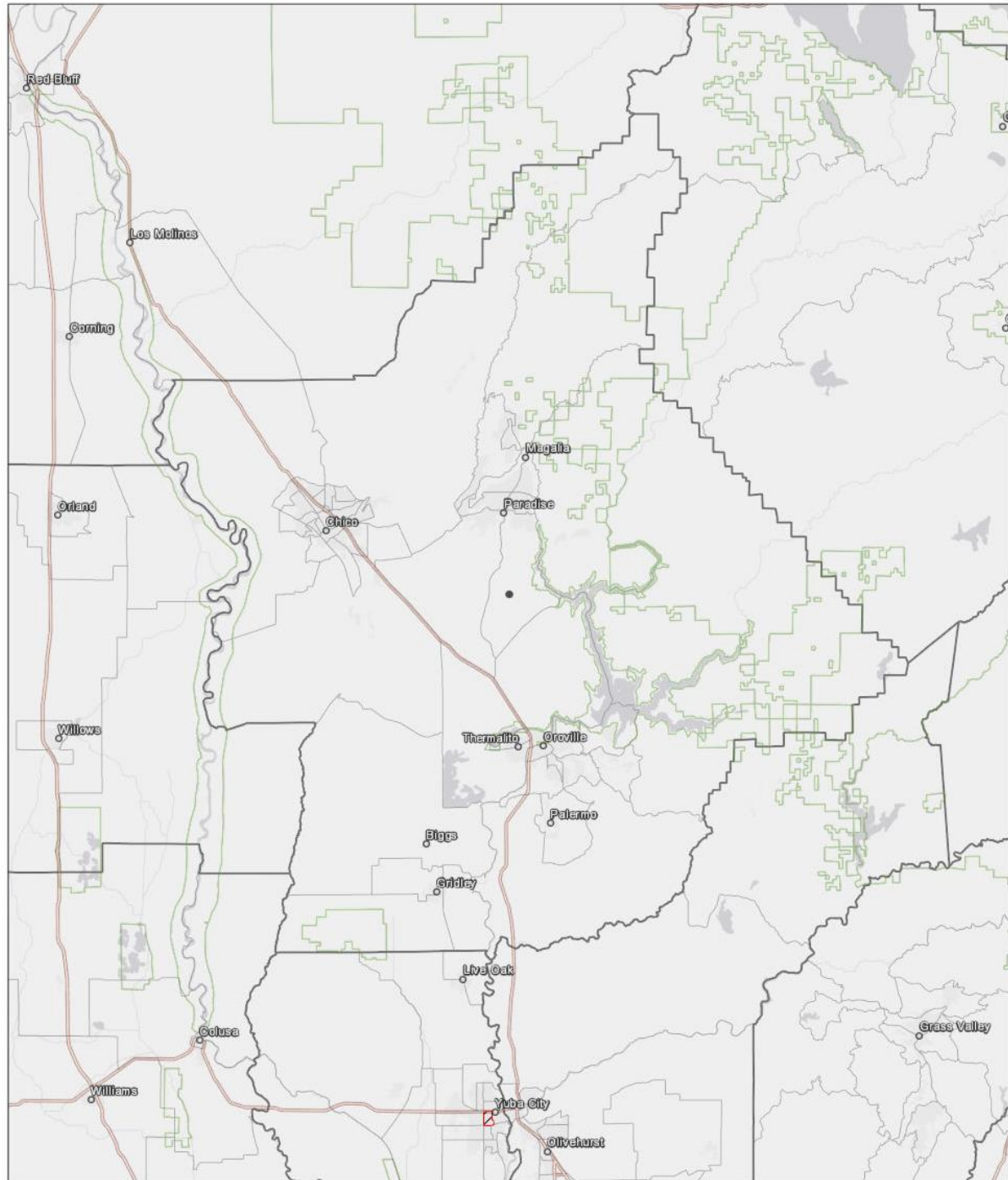
A more recent data source is the Tax Credit Allocation Committee (TCAC) area of high segregation and poverty map from 2021. Figure 15 depicts areas of high segregation and poverty in 2021 as defined by TCAC throughout Butte County. As of 2021, these areas are located in Chico and around the City of Oroville, including the communities of Thermalito and Palermo. There are no areas of high segregation and poverty as defined by TCAC in Biggs, Gridley, Paradise, or Magalia.

State guidance asks for separate evaluations of significant concentrations of poverty and concentrations of BIPOC populations in addition to the 2013 R/ECAP map and 2021 TCAC area of high segregation and poverty map. Poverty is evaluated by poverty status maps whereas concentrations of BIPOC populations is evaluated by neighborhood segregation maps. Figure 16 shows the percentage of individuals experiencing poverty by census tract using income from the past 12 months. In 2019 in Butte County, the highest rates of poverty (greater than 40 percent) are in Chico as well as 30-40 percent rate of poverty centered around the City of Oroville near the communities of Thermalito and Palermo. Much of south Butte County has a 10-20 percent poverty rate whereas much of north Butte County around the City of Chico has a poverty rate less than 10 percent.

With the Town of Paradise, there are only two remaining affordable developments post-Camp Fire - PCV/CHIP and Paradise Gardens III which is where the Town expects that most households experiencing poverty to be concentrated. Prior to the fire, older areas of town with older housing stock (towards the downtown core) were typically more "affordable."

Figure 17 identifies which racial and ethnic groups have more than 10 percent representation within a given census tract in 2019. Much of northeastern Butte County is identified as "Mostly White," especially between the communities of Chico, Paradise, and Magalia. East of Oroville is also identified as "Mostly White." Much of west Butte County and a portion of south Butte County below Palermo is identified as "Latino-White." The communities of Thermalito and Palermo and census tracts near southeast Chico and north Oroville are identified as "3 Group Mix", which means the census tracts have more than 10 percent representation of three racial and ethnic groups. The area between Thermalito, Oroville, and Palermo is identified as "4 Group Mix", which means the census tracts have more than 10 percent representation of four racial and ethnic groups. The far eastern part of Butte County is identified as "Other-White."

In the Town of Paradise, only 6.2 percent of the population is non-White per the 2019 ACS data and local knowledge has revealed that there is no single neighborhood/area of town where BIPOC are concentrated.



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County Boundaries

(R) Racially or Ethnically Concentrated Areas of Poverty "R/ECAPs" (HUD, 2009 - 2013) - Tract

0 - Not a R/ECAP

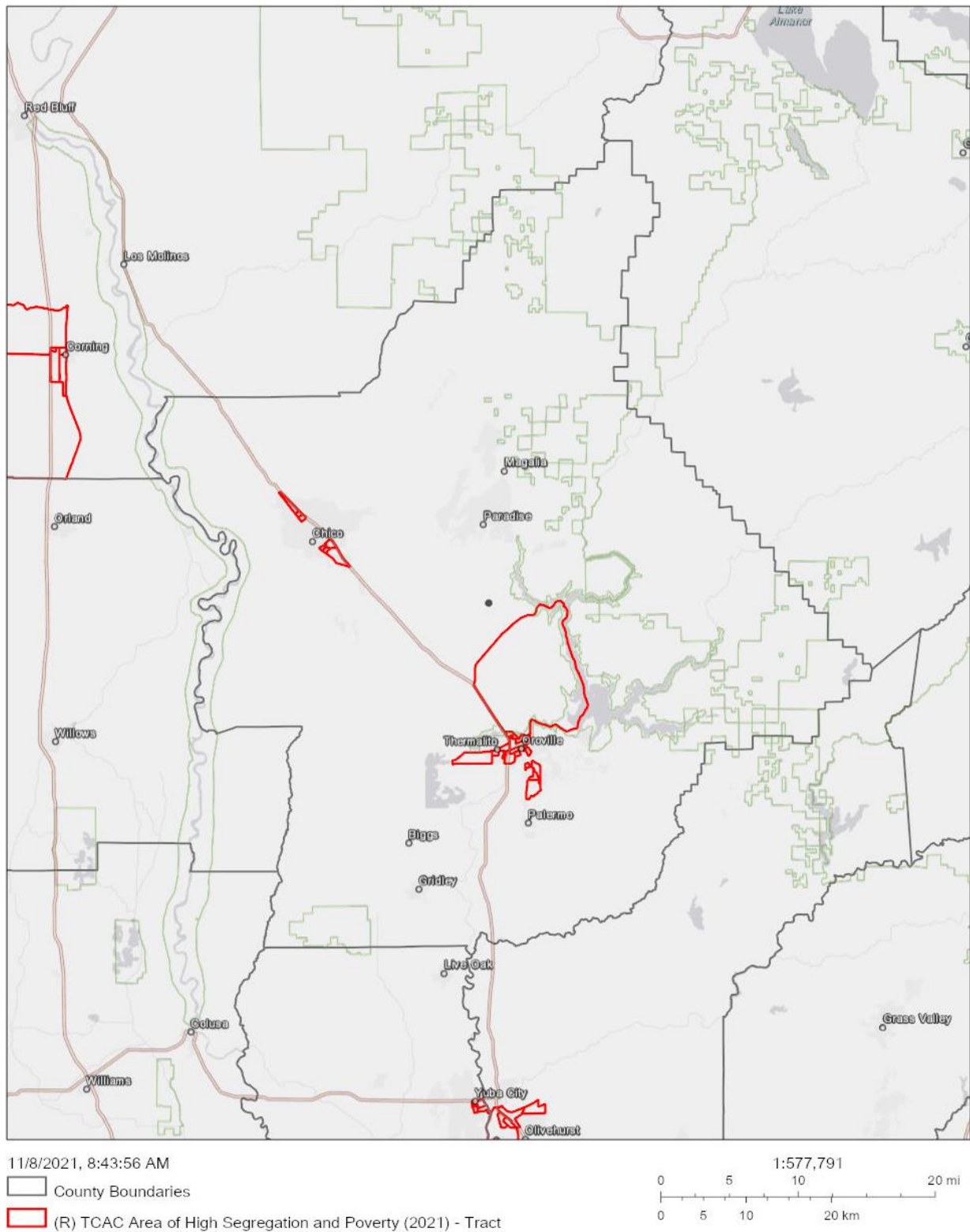
1 - R/ECAP

1:577,791

0 5 10 20 mi

0 5 10 20 km

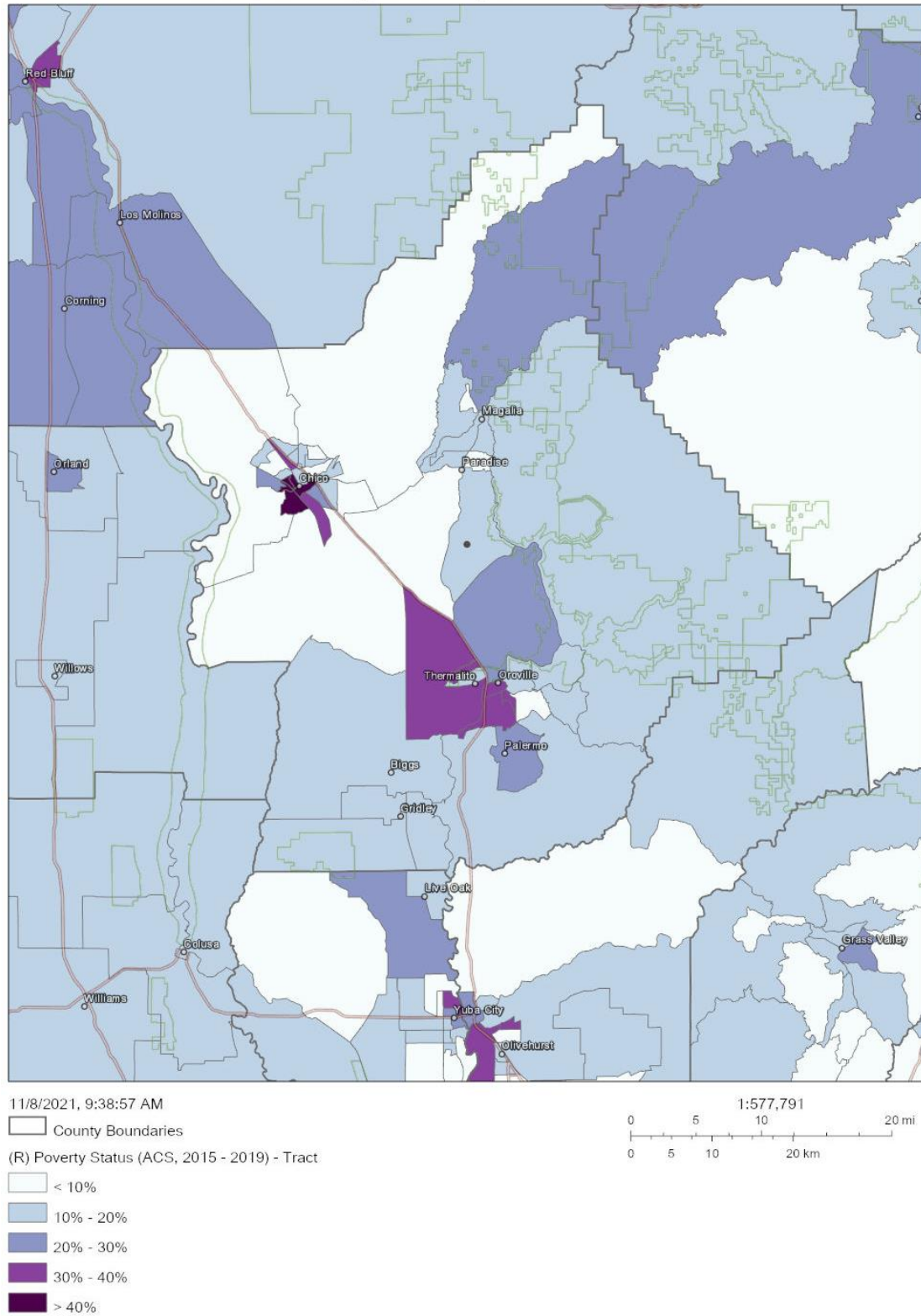
**Figure 14: Butte County, R/ECAPs Map, 2013***Source: HCD AFFH Data Resources and Mapping Tool: 2009-2013 U.S. Department of Housing and Urban Development*



**Figure 15: Butte County, TCAC Area of High Segregation and Poverty Map, 2021**

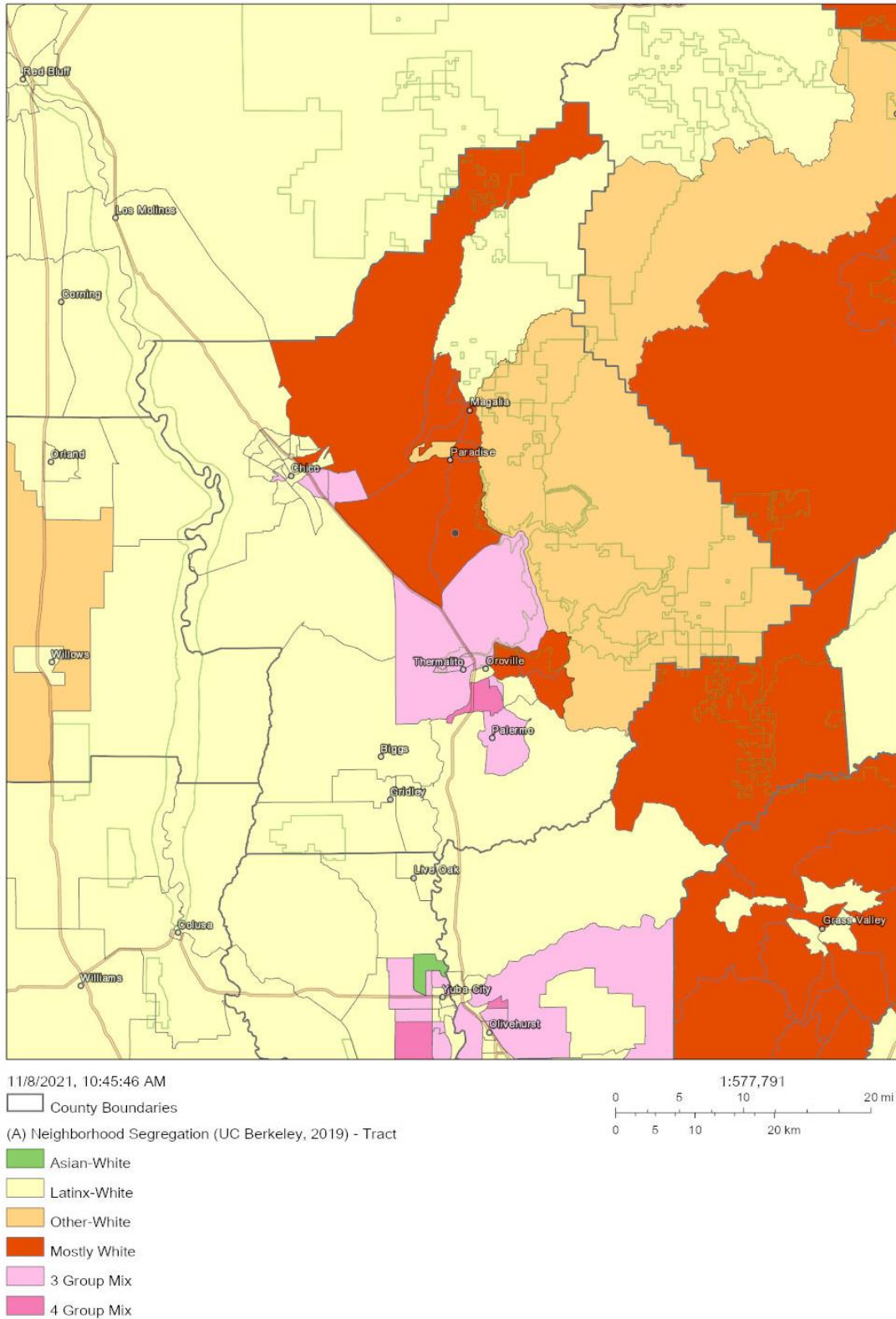
Source: HCD AFFH Data Resources and Mapping Tool: 2021 TCAC





**Figure 16: Butte County, Poverty Status Map, 2019**

Source: HCD AFFH Data Resources and Mapping Tool: 2015-2019 American Community Survey



**Figure 17: Butte County, Neighborhood Segregation Map, 2019**

Source: HCD AFFH Data Resources and Mapping Tool: UC Berkeley, 2019

## CONCLUSIONS AND SUMMARY OF ISSUES

In conclusion, while there are no HUD-defined R/ECAP areas in Butte County, the Tax Credit Allocation Committee (TCAC) identifies some areas in Chico and around the City of Oroville as areas experiencing high segregation and poverty. There are no such areas in Paradise, but some amount of poverty concentration is expected in the remaining affordable developments in the Town. There is no single neighborhood or area of town where BIPOC are concentrated.

## D. DISPARITIES IN ACCESS TO OPPORTUNITY

The fourth topic of the Assessment of Fair Housing is an assessment of disparities in access to opportunity in the jurisdiction. "Access to opportunity is a concept to approximate place-based characteristics linked to critical life outcomes. Access to opportunity oftentimes means both improving the quality of life for residents of low-income communities, as well as supporting mobility and access to 'high resource' neighborhoods" (*California State Department of Housing and Community Development, Affirmatively Furthering Fair Housing, 2021*).

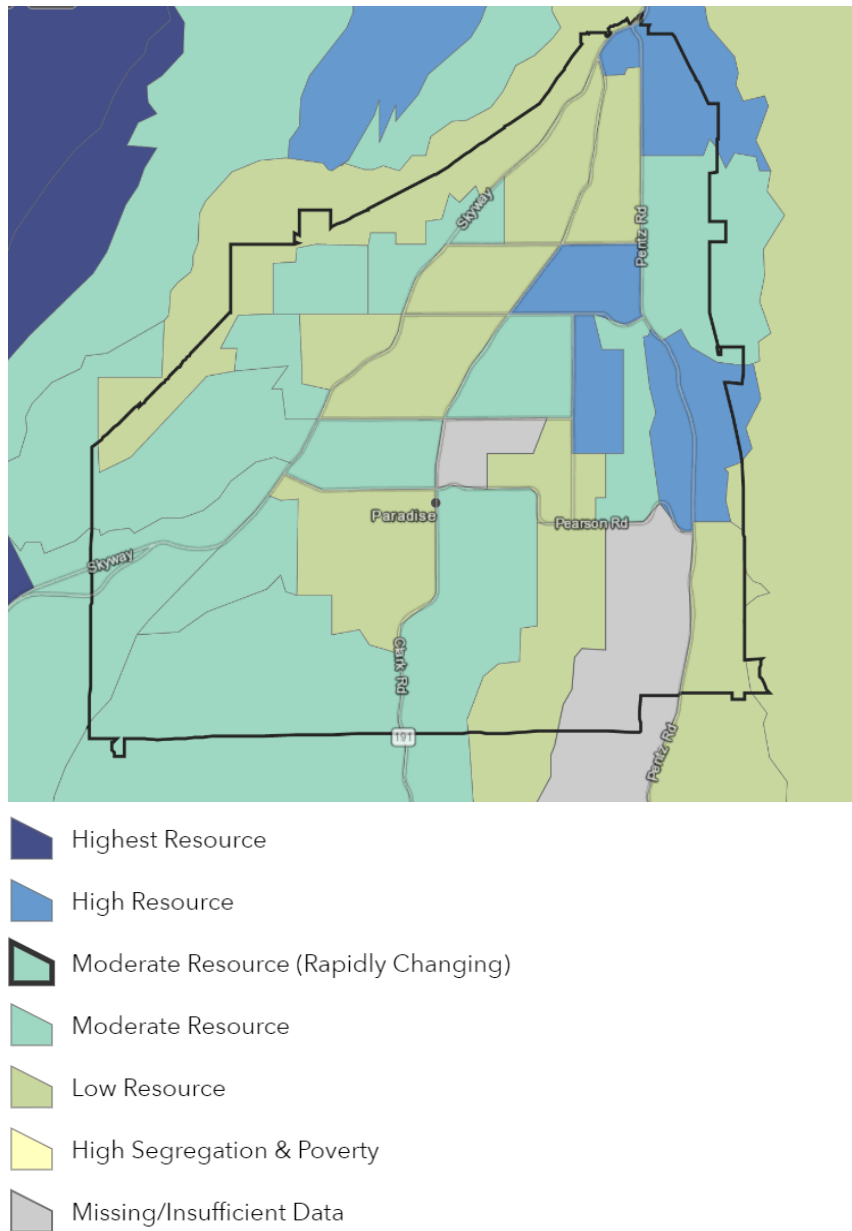
### LOCAL AND REGIONAL PATTERNS AND TRENDS

Maps, data tables, and narratives are used to analyze local and regional patterns and trends regarding access to opportunity. Measures such as economic, education, environmental scores, job proximity, commuting, and work status are considered. The California Fair Housing Task Force created an opportunity map to identify regions whose characteristics have been shown by research to support positive economic, educational, and health outcomes for low-income families, particularly long-term outcomes for children. The map provides composite scores for each census tract based on economic scores, education scores, and environmental scores.

According to the 2020 California Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (TCAC) Opportunity Area Map shown in Figure 18, the majority of Paradise is considered moderate or low resource areas. High resource areas, which are concentrated in the northeast portion of the Town, are areas with high index scores for a variety of educational, environmental, and economic indicators. Some of the indicators identified by TCAC include high levels of employment and close proximity to jobs, access to effective educational opportunities for both children and adults, low concentration of poverty, and low levels of environmental pollutants, among others. However, this data was collected prior to the 2018 Camp Fire and does not reflect the reality of the town today.

Town staff notes that the high resource area shown on mid-lower Pentz Road on the eastern edge of the Town was because of the hospital that has since closed. The high resource areas noted along Sawmill Road west of the hospital and along upper Pentz Road are residential without employment. The high resource area shown near Wagstaff Road/Clark Road and Wagstaff Road/Pentz Road continue to have access to employment and schools today.



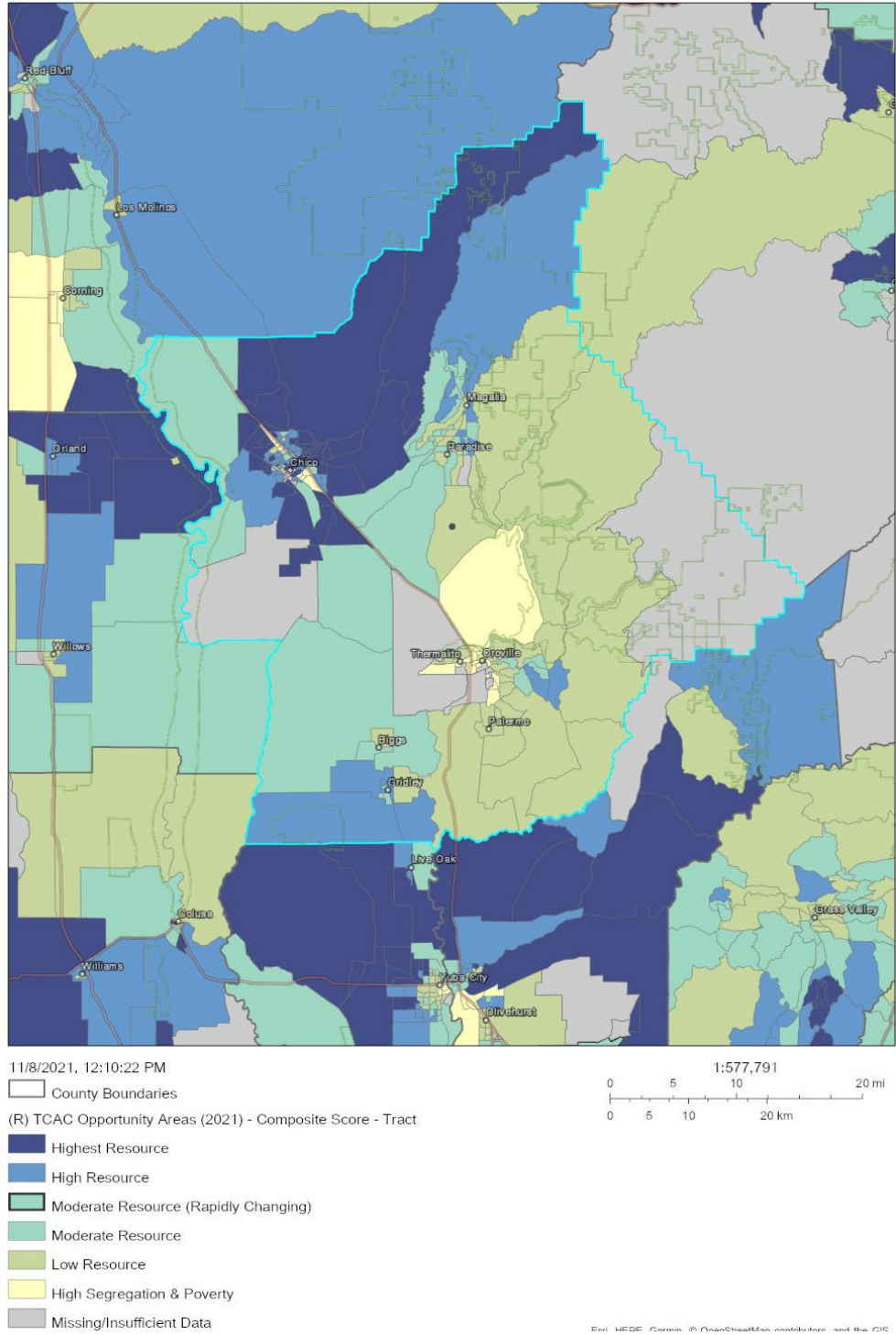


**Figure 18: Town of Paradise, TCAC Opportunity Areas – Composite Score Map, 2021**

*Notes: The data behind this figure reflects the reality of the Town of Paradise prior to the 2018 Camp Fire. More recent data is not available.*

*Source: HCD AFFH Data Resources and Mapping Tool: TCAC*

Figure 19 depicts census tract level data on access to opportunity in Butte County. Generally, north and northeast Butte County is identified as “highest resource,” west Butte County is identified as “moderate resource,” and south and southeast Butte County is identified as “low resource”. The Town of Paradise is shown with a mix of low, moderate, and high resource areas. The remoteness of Paradise from major employment centers and lack of effective transit are major factors keeping more of Paradise from being a high resource area before and after the Camp Fire.



**Figure 19: Butte County, TCAC Opportunity Areas – Composite Score Map, 2021**

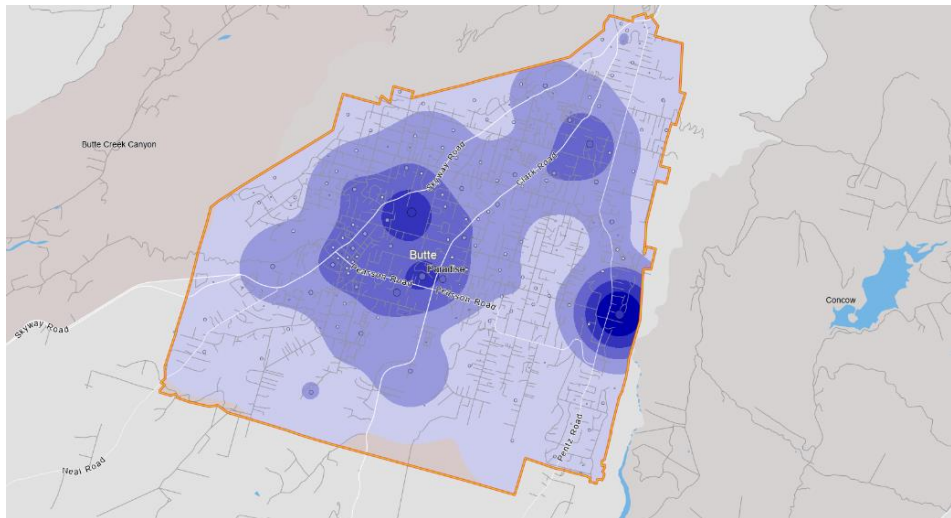
*Notes: The data behind this figure reflects the reality of Butte County prior to the 2018 Camp Fire. More recent data is not available.*

*Source: HCD AFFH Data Resources and Mapping Tool: TCAC*

## LOCAL DATA AND KNOWLEDGE

Town staff has indicated that as the Town rebuilds, there do not appear to be disparities in the types of housing being rebuilt in various areas, other than the lack of rental housing generally. The Town allows all housing types (stick built, modular, and manufactured) in all residentially zoned areas. The Town purposely does not enforce CC&Rs which can cause areas of affluence. Some areas are closer to schools or employment, but the primary issue is the lack of rental housing in general, discussed in the section on Disproportionate Housing Needs and Displacement Risk.

Prior to the 2018 Camp Fire, Paradise consistently had more residents living in Paradise and working outside of the town from 2002 to 2018 and a comparatively low amount of people employed in Paradise but living outside. Therefore, many residents of Paradise likely work elsewhere in Butte County or the surrounding area. Between 2002 and 2015, the number of jobs in Paradise increased by 17 percent, and then dropped again by 7 percent between 2015 and 2018. After the 2018 Camp Fire, many jobs, especially related to Feather River Hospital, were lost or moved elsewhere in the County due to the destruction of the fire. Census estimations from just before the 2018 Camp Fire demonstrate that the concentration of jobs in Paradise were in the east near the now-closed Feather River Hospital (see Figure 20). Feather River Hospital was previously the leading employer in Paradise. Over 1,000 part-time and full-time employees were laid off following the immediate closure. After the fire, employees were transferred to nearby clinics in Chico and Marysville or were offered a job with Adventist Medical if they were willing to relocate.<sup>3</sup>



**Figure 20: Jobs Concentration – Pre-Fire**

Source: U.S. Census Bureau On The Map Work Area Profile Analysis, 2018.

For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-10.

<sup>3</sup> George, K., 2019. "Feather River hospital to close, over 1,200 employees to be laid off." The Orion, Chico CA, <https://theorion.com/78106/news/feather-river-hospital-to-close-over-1200-employees-to-be-laid-off/>.

## OTHER RELEVANT FACTORS

In 2020, the preparation of the Post Camp Fire Regional Population and Transportation Study identified the effects the 2018 Camp Fire had on transportation, economics, and demographics. This study determined that overall traffic volume (including trucks) decreased 3 percent post-fire overall in Butte County, but by 43 percent in the Town of Paradise. The largest decreases in total vehicle volume in the Town are shown occurring at Clark Rd north of Pearson Rd (-49 percent), Skyway south of Pearson Rd (-30 percent), Clark Rd north of Wagstaff Rd (-54 percent), Pearson Rd east of Clark Rd (-61 percent), and Bille Road east of Skyway (-65 percent).

From a transportation perspective, most of Butte County can be considered low density and/or rural, and this characteristic has a direct impact on transportation and mobility. There are limited options for using public transit, except within the City of Chico, 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. Historically, most people have had to drive to get from one place to another within the county.

Respondents at pop-up events in 2019<sup>4</sup> were asked what issues kept them from walking or bicycling more frequently. The most frequent responses include:

- Issues walking outside: 34 percent missing sidewalks, 30 percent unsafe crossing/intersection, 26 percent personal safety.
- Issues biking: 37 percent no bike paths/lanes, 35 percent high car traffic speed/volume, 15 percent no place to park bike at destination.

The Town's newly adopted Transportation Master Plan (TMP) has a vision of a community "where all residents can comfortably and conveniently walk and bicycle without concerns." The TMP includes an Active Transportation Plan that calls for increased connectivity between housing and residential neighborhoods, jobs and employment centers, education facilities, and parks. Implementation of the Active Transportation Plan includes 36 miles of interconnected pathways along 12 of the Town's primary corridors. Off-street trails would connect the downtown area with the rest of town, thereby improving mobility options for residents and reducing bicycle and pedestrian conflicts with vehicles. The proposed off-street multi-use trail network would have the dual functionality of serving emergency responder vehicles during emergencies and evacuations. Implementation of the TMP will therefore facilitate greater transportation options and could increase residents' access to opportunity.

The findings of the Post Camp Fire Regional Population and Transportation Study support what one would expect following a major natural disaster. Traffic in the impacted community decreased, traffic levels were up in the primary surrounding community, and weekday activity between the impacted county and neighboring counties increased (e.g., contractors, supplies, people commuting to temporary housing and jobs). Cars were still the dominant mode of travel and will likely remain so without significant capital expenditures for increased transit service plus improvements to bicycle and pedestrian facilities.

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<sup>4</sup> According to AIM Consulting, a total of more than 80 people (combined) attended pop-up events on November 24 (Chico Christmas Preview, Chico, CA) and December 5 (Paradise Alliance Church Community Dinner, Paradise, CA).

The findings of this study also reveal that people with disabilities face unique issues with access to opportunity due to the community wide lack of sidewalks, which is due to the rural nature of the Town. The TMP pointed to specific intersections in Town in need of ADA upgrades. In addition, consistent with State and federal law, the Town requires all new multi-family buildings to comply with current ADA regulations. Therefore, the majority of multi-family developments, when built out, will have handicap accessibility.

### CONCLUSIONS AND SUMMARY OF ISSUES

In conclusion, the Town's overall access to opportunity was very affected by the 2018 Camp Fire and the subsequent closure of some of the Town's major employers. The remoteness of Paradise from major employment centers and lack of effective transit are major factors keeping more of Paradise from being a high resource area before and after the Camp Fire. There do not appear to be disparities in the types of housing being rebuilt in various areas, other than the lack of rental housing generally. Due to the rural nature of the Town, a lack of sidewalks and public transportation also cause unique challenges for persons with disabilities.

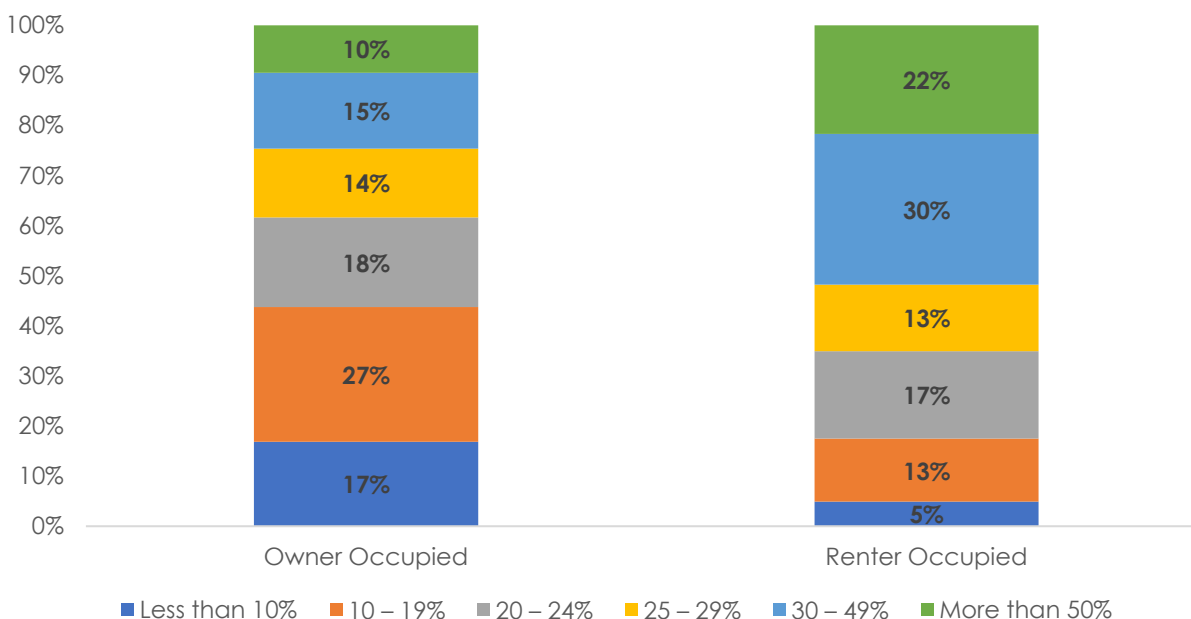
## E. DISPROPORTIONATE HOUSING NEEDS AND DISPLACEMENT RISK

The fifth and final topic of the Assessment of Fair Housing is disproportionate housing needs and displacement risk. According to HCD, "Disproportionate housing needs generally refers to a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing need when compared to the proportion of members of any other relevant groups, or the total population experiencing that category of housing need in the applicable geographic area. For purposes of this definition, categories of housing need are based on such factors as cost burden and severe cost burden, overcrowding, homelessness, and substandard housing conditions." Displacement is used to describe any involuntary household move caused by landlord action or market changes, including disaster-driven displacement.

### LOCAL AND REGIONAL PATTERNS AND TRENDS

Maps, data tables, and narrative illustrate local and regional patterns and trends of disproportionate housing needs and displacement risk. While there is not accurate spatial data about what parts of Town experience this more than others, supplemental local knowledge is incorporated in the following section.

Renters are often more cost-burdened than owners. While the housing market has resulted in home prices increasing over time, homeowners often have mortgages with fixed rates, whereas renters are more likely to be impacted by market increases. When looking at the cost burden across tenure in Paradise, 52 percent of renters spend 30 percent to 50 percent of their income on housing compared to 25 percent of those that own (see Figure 21). Additionally, 22 percent of renters spend 50 percent or more of their income on housing, compared to 10 percent of owners who are severely cost-burdened.



**Figure 21: Cost Burden by Tenure**

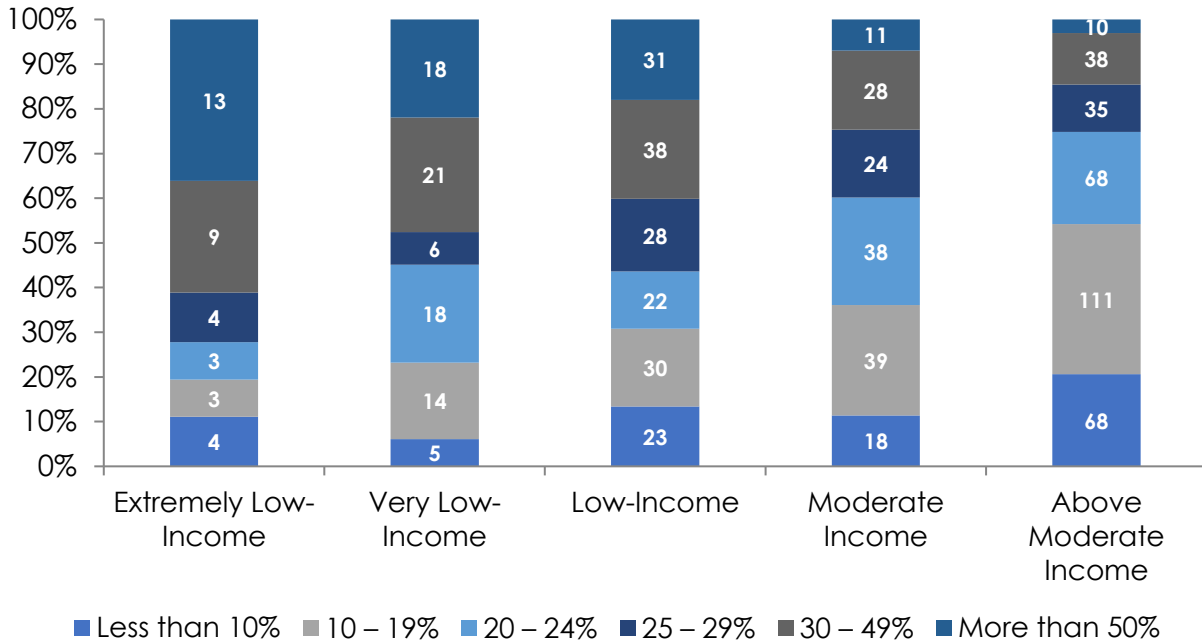
*Universe: Occupied housing units*

*Notes: Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. HUD defines cost-burdened households as those whose monthly housing costs exceed 30 percent of monthly income, while severely cost-burdened households are those whose monthly housing costs exceed 50 percent of monthly income.*

*Source: U.S. Department of Housing and Urban Development (HUD), Town of Paradise Local Census Survey 2021.*

In Paradise, 11 percent of households spend 50 percent or more of their income on housing, while 17 percent spend 30 percent to 50 percent. However, these rates vary greatly across income categories (see Figure 22). For example, 61 percent of Extremely Low-Income households in Paradise are cost burdened and 36 percent spend over half of their income on housing. For Paradise residents with Moderate or Above Moderate incomes, just 4 percent are severely cost-burdened, and 82 percent with Moderate or Above Moderate incomes spend less than 30 percent of their income on housing.

## APPENDIX B



**Figure 22: Cost Burden by Income Level**

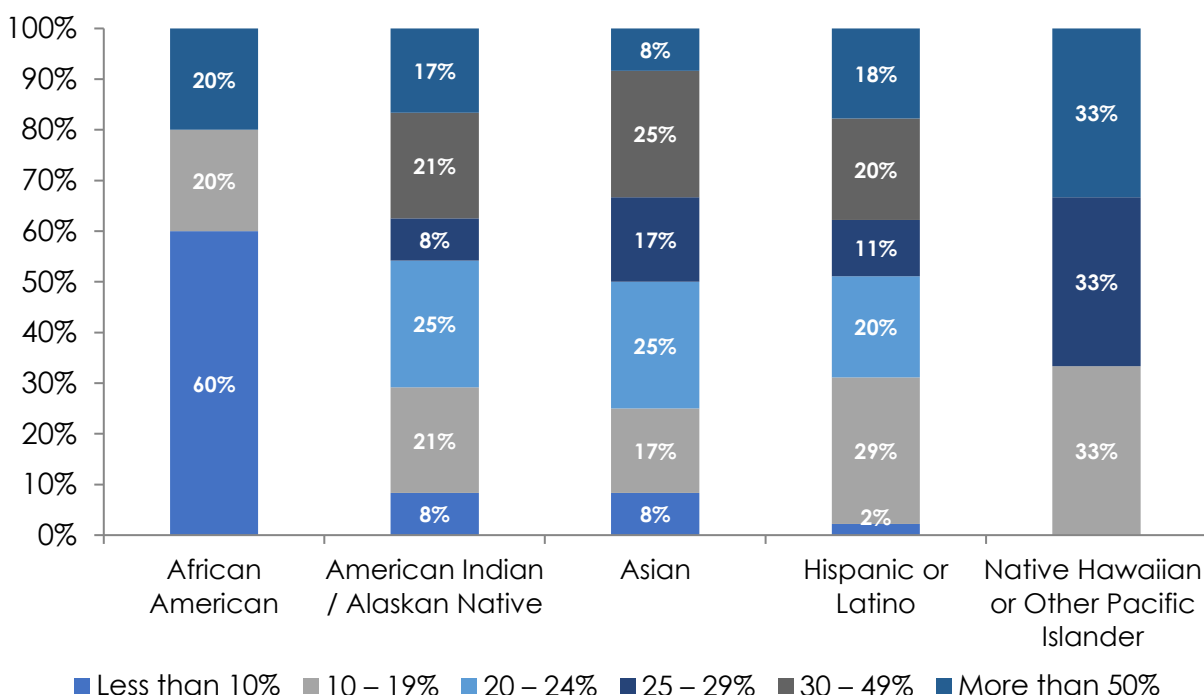
*Universe: Occupied housing units*

*Notes: Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is “select monthly owner costs”, which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. HUD defines cost-burdened households as those whose monthly housing costs exceed 30 percent of monthly income, while severely cost-burdened households are those whose monthly housing costs exceed 50 percent of monthly income. Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Alameda and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located.*

*Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release.*

Although the Town of Paradise Local Census Survey of 2021 has limited racial data, *Asian* respondents are the most cost burdened with 25 percent spending 30 percent to 50 percent of their income on housing, and *Native Hawaiian or Other Pacific Islander* residents are the most severely cost burdened with 33 percent spending more than 50 percent of their income on housing (see Figure 23).





**Figure 23: Cost Burden by Race**

*Universe: Occupied housing units*

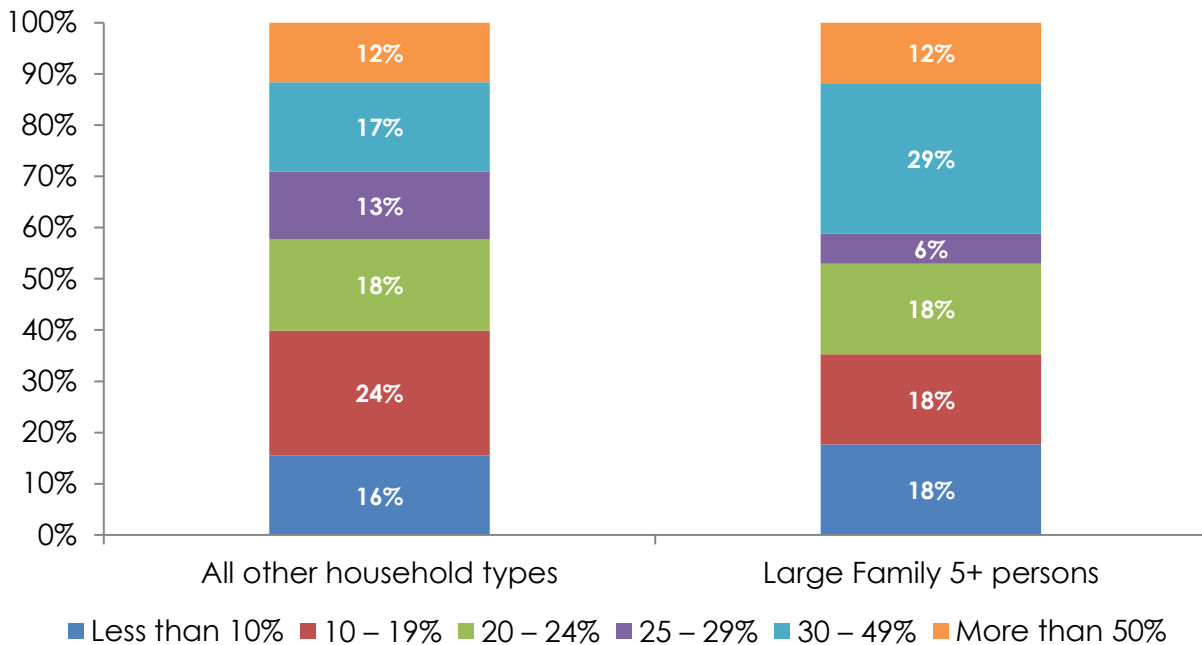
*Notes: Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. HUD defines cost-burdened households as those whose monthly housing costs exceed 30 percent of monthly income, while severely cost-burdened households are those whose monthly housing costs exceed 50 percent of monthly income. For the purposes of this graph, the "Hispanic or Latinx" racial/ethnic group represents those who identify as having Hispanic/Latinx ethnicity and may also be members of any racial group. All other racial categories on this graph represent those who identify with that racial category and do not identify with Hispanic/Latinx ethnicity.*

*Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release.*

*For the data table behind this figure, please refer to the Data Packet Workbook, Table OVER-04.*

Large family households often have special housing needs due to a lack of adequately sized affordable housing available. The higher costs required for homes with multiple bedrooms can result in larger families experiencing a disproportionate cost burden than the rest of the population and can increase the risk of housing insecurity. In Paradise, 29 percent of large family households experience a cost burden of 30 percent-50 percent, while 12 percent of large households spend more than half of their income on housing. Some 17 percent of all other households have a cost burden of 30 percent-50 percent, with 12 percent of households spending more than 50 percent of their income on housing (see Figure 24).





**Figure 24: Cost Burden by Household Size**

*Universe: Occupied housing units*

*Notes: Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. HUD defines cost-burdened households as those whose monthly housing costs exceed 30 percent of monthly income, while severely cost-burdened households are those whose monthly housing costs exceed 50 percent of monthly income.*

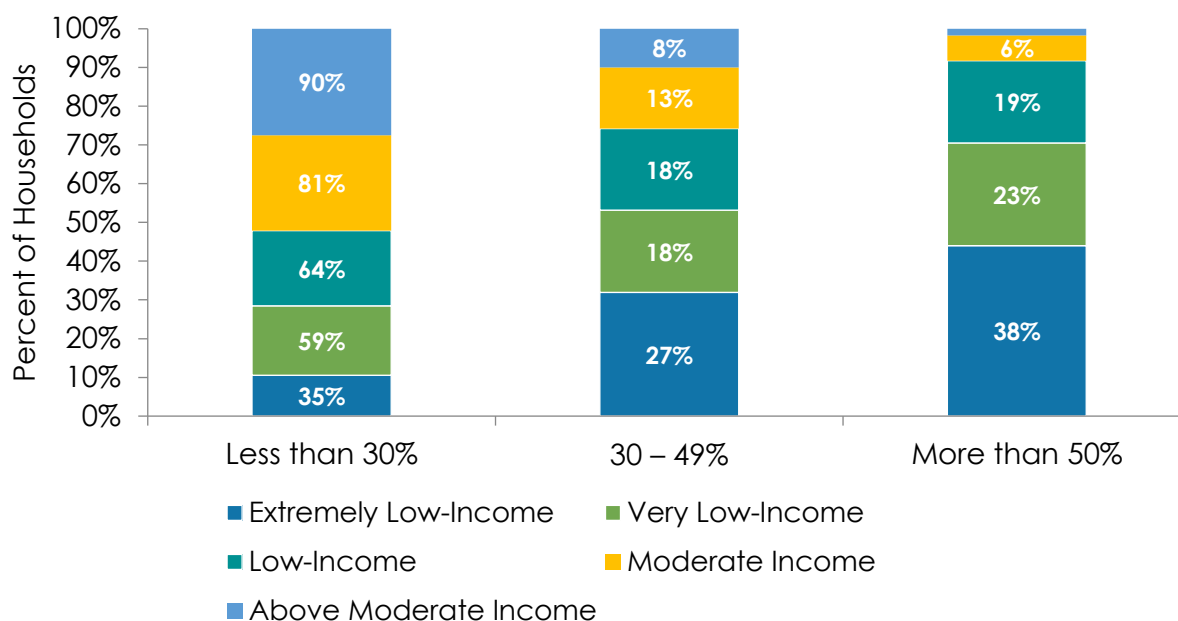
*Source: U.S. Department of Housing and Urban Development (HUD), Town of Paradise Local Census Survey 2021.*

*For the data table behind this figure, please refer to the Data Packet Workbook, Table OVER-05.*

When cost-burdened seniors are displaced from their homes, it puts further stress on the local rental market and forces long-time residents out of the community they call home. Understanding how seniors might be cost-burdened is of particular importance due to their special housing needs, particularly for low-income seniors. Twenty-eight percent of extremely low- and very low-income seniors (i.e., making less than 30 percent of AMI) are spending the majority of their income on housing. For Moderate- or Above Moderate-Income seniors, the vast majority (87 percent) are not cost-burdened and spend less than 30 percent of their income on housing (see Figure 25).

Overcrowding occurs when the number of people living in a household is greater than the home was designed to hold. There are several different standards for defining overcrowding, but this report uses the Census Bureau definition, which is more than one occupant per room (not including bathrooms or kitchens). Additionally, the Census Bureau considers units with more than 1.5 occupants per room to be severely overcrowded. Unfortunately, no data on overcrowding has been collected since the 2018 Camp Fire.

Census data collected prior to the fire reveals that no renter or owner households were severely overcrowded (more than 1.5 occupants per room). However, in Paradise prior to the 2018 fire, 0.3 percent of renters experienced moderate overcrowding (1 to 1.5 occupants per room), compared to 2 percent for those own.



**Figure 25: Cost-Burdened Senior Households by Income Level**

*Universe: Senior households*

*Notes: For the purposes of this graph, senior households are those with a householder who is aged 62 or older. Cost burden is the ratio of housing costs to household income.*

*Source: U.S. Department of Housing and Urban Development (HUD), Town of Paradise Local Census Survey 2021.*

*For the data table behind this figure, please refer to the Data Packet Workbook, Table SEN-02.*

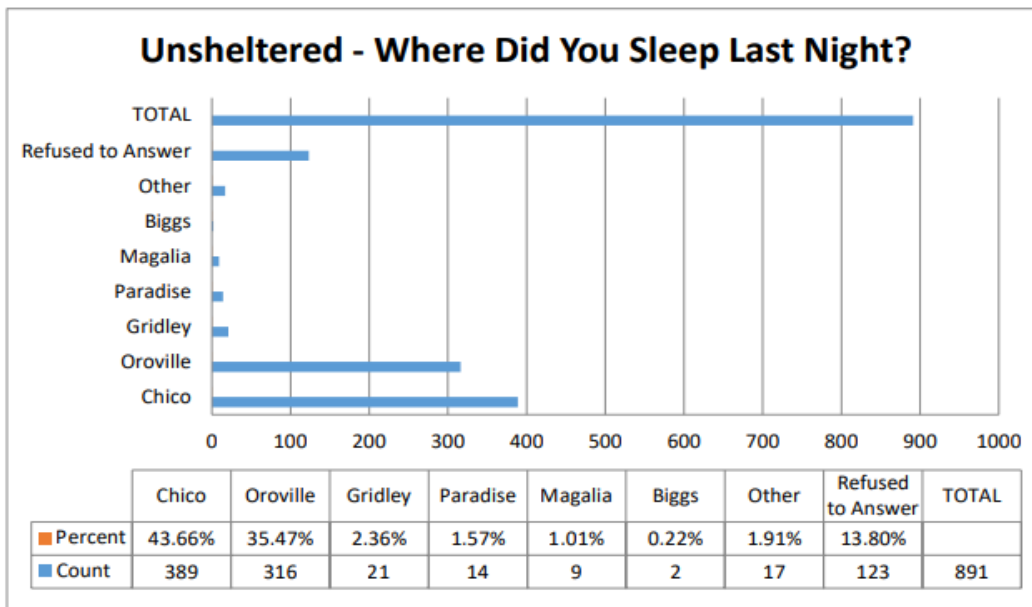
The Homeless Point in Time Survey is federally mandated by the U.S. Department of Housing and Urban Development (HUD) to survey the sheltered and unsheltered homeless population in cities and counties throughout the nation. HUD defines sheltered homeless persons as adults, children, and youth, and unaccompanied children who, on the night of the survey, are living in shelters or transitional housing for the homeless. HUD defines unsheltered homeless as those who reside in places not meant for human habitation, such as cars, parks, sidewalks, abandoned buildings, or on the street. The PIT Survey is conducted on one night and provides a snapshot of a county's visible homeless population. Historically, the PIT Survey has undercounted the total homeless population because it is not possible to contact all persons who live in alternative housing arrangements. Furthermore, it has long been known that a number of people experiencing unstable housing may live in a variety of shared housing arrangements or couch surf, and people in this situation are not counted in the PIT survey. The PIT Survey is simply a summary of those persons with whom contact was made on a designated day; it is not intended to represent a complete count of the homeless population who live in Butte County. The data presented each year through the official Annual Housing Assessment Report (AHAR) are labeled as an "estimate" of the homeless population.

The 2019 PIT Count in Butte County identified a total of 2,304 sheltered, unsheltered and FEMA housed homeless adults and children county wide (891 unsheltered, 420 sheltered, and 993 people sheltered with FEMA support), which is 16 percent higher than the count in 2017 (1,983). The significant increase in the 2019 PIT Count can be attributed to: Camp Fire related homeless in FEMA provided housing (temporary), increased survey efficiency through use of a mobile web-based technology instead of

## APPENDIX B

paper surveys, implementation of revised survey questions to follow HUD guidelines (e.g., chronic homeless, domestic violence), planned targeting of encampment sites, and broad participation from the community.

The 2019 PIT Survey identified 1,551 homeless households countywide. Of these, 201 households resided in Emergency Shelter, 65 in Transitional Housing, 397 in FEMA housing, and 888 were unsheltered. Despite these efforts to improve the accuracy of the survey, the actual number of homeless individuals is estimated to be higher than PIT Survey results due to ongoing challenges in locating homeless individuals, especially those who are displaced and unhoused due to the Camp Fire. Of the 891 unsheltered individuals, 2 percent had slept in the Town of Paradise the night prior to the count (see Figure 26).



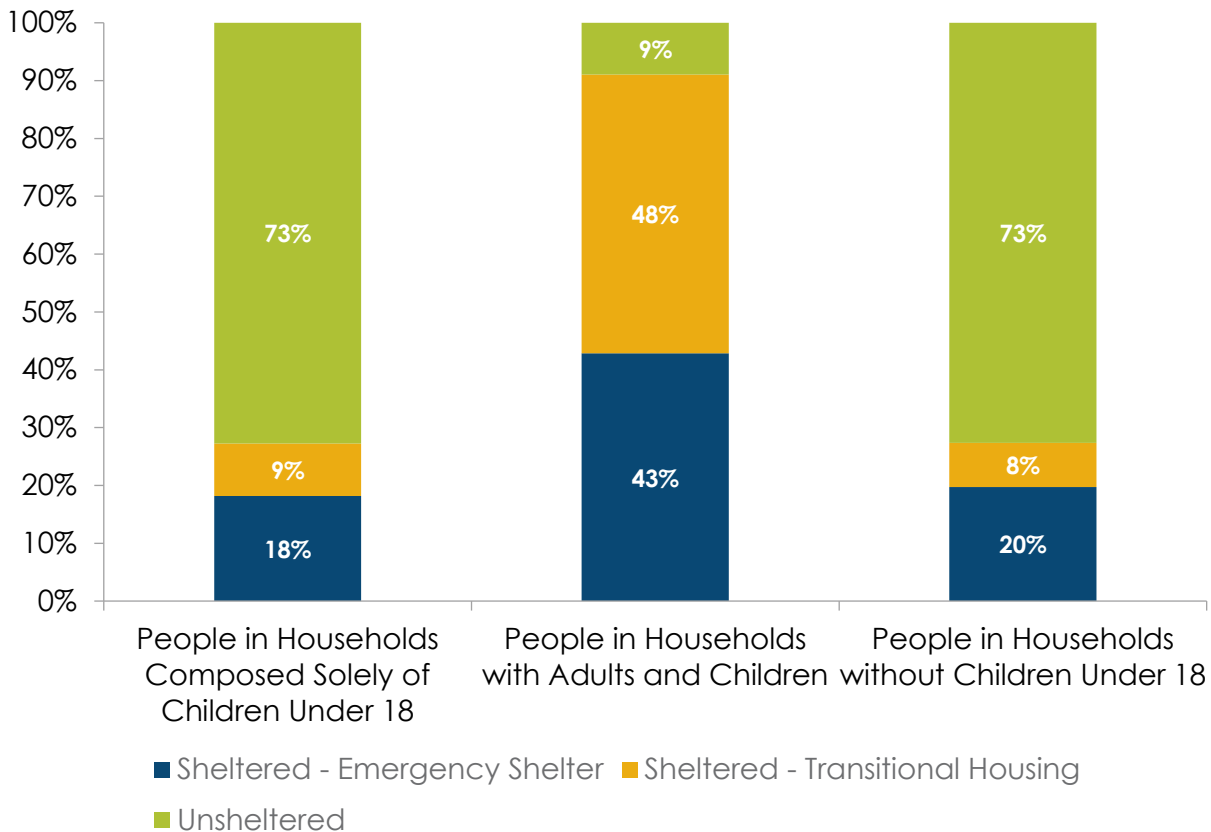
**Figure 26: Unsheltered Point-in-Time (PIT) Count in Butte County**

*Universe: Population experiencing homelessness*

*Notes: This data is based on Point-in-Time (PIT) information provided to HUD by CoCs in the application for CoC Homeless Assistance Programs. The PIT Count provides a count of sheltered and unsheltered homeless persons on a single night during the last ten days in January.*

*Source: Butte Countywide Homeless Continuum of Care.*

In Butte County, the most common type of household experiencing homelessness is those without children in their care. Among households experiencing homelessness that do not have children, 73 percent are unsheltered. Of homeless households with children, most are sheltered in transitional housing or emergency shelter (see Figure 27).



**Figure 27: Homelessness by Household Type and Shelter Status, Chico, Paradise/Butte County**

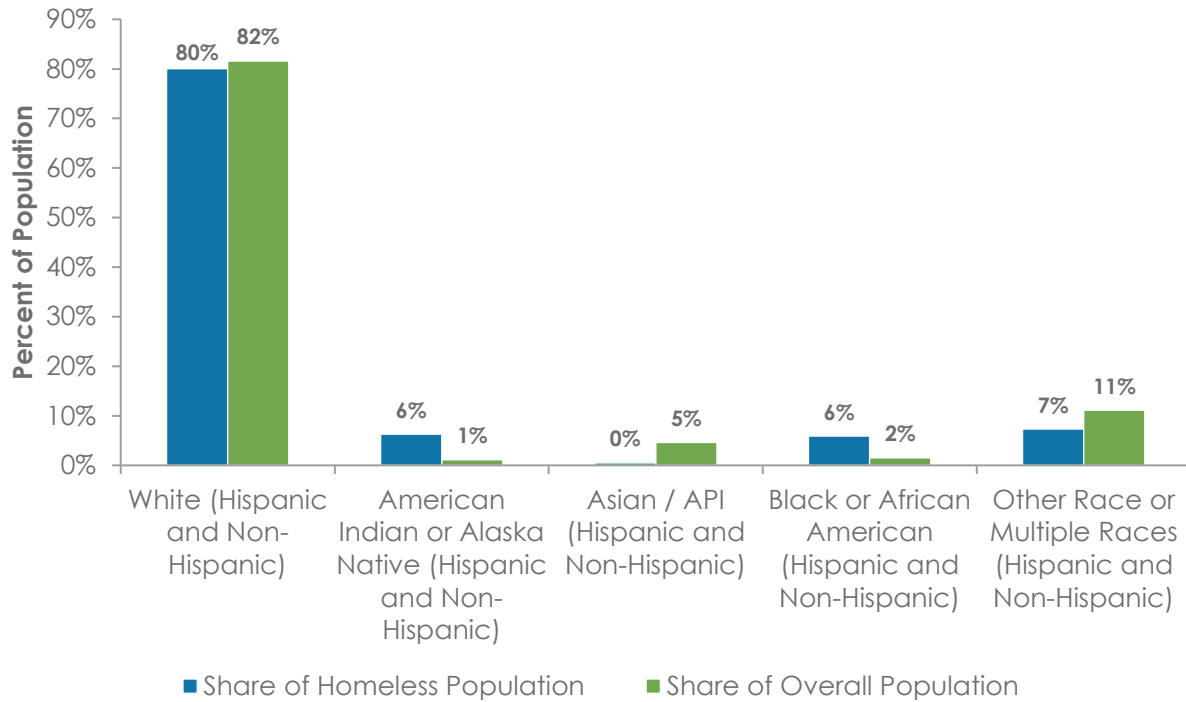
*Universe: Population experiencing homelessness*

*Notes: This data is based on Point-in-Time (PIT) information provided to HUD by CoCs in the application for CoC Homeless Assistance Programs. The PIT Count provides a count of sheltered and unsheltered homeless persons on a single night during the last ten days in January.*

*Source: U.S. Department of Housing and Urban Development (HUD), Continuum of Care (CoC) Homeless Populations and Subpopulations Reports (2019).*

*For the data table behind this figure, please refer to the Data Packet Workbook, Table HOMELS-01.*

People of color are more likely to experience poverty and financial instability as a result of federal and local housing policies that have historically excluded them from the same opportunities extended to white residents. Consequently, people of color are often disproportionately impacted by homelessness. In Butte County, American Indian or Alaska Native (Hispanic and Non-Hispanic) make up 6 percent of the homeless population, while making up only 1 percent of the overall population. Similarly, Black or African American (Hispanic or Non-Hispanic) residents make up 6 percent of the homeless population, while making up only 2 percent of the overall population (see Figure 28).



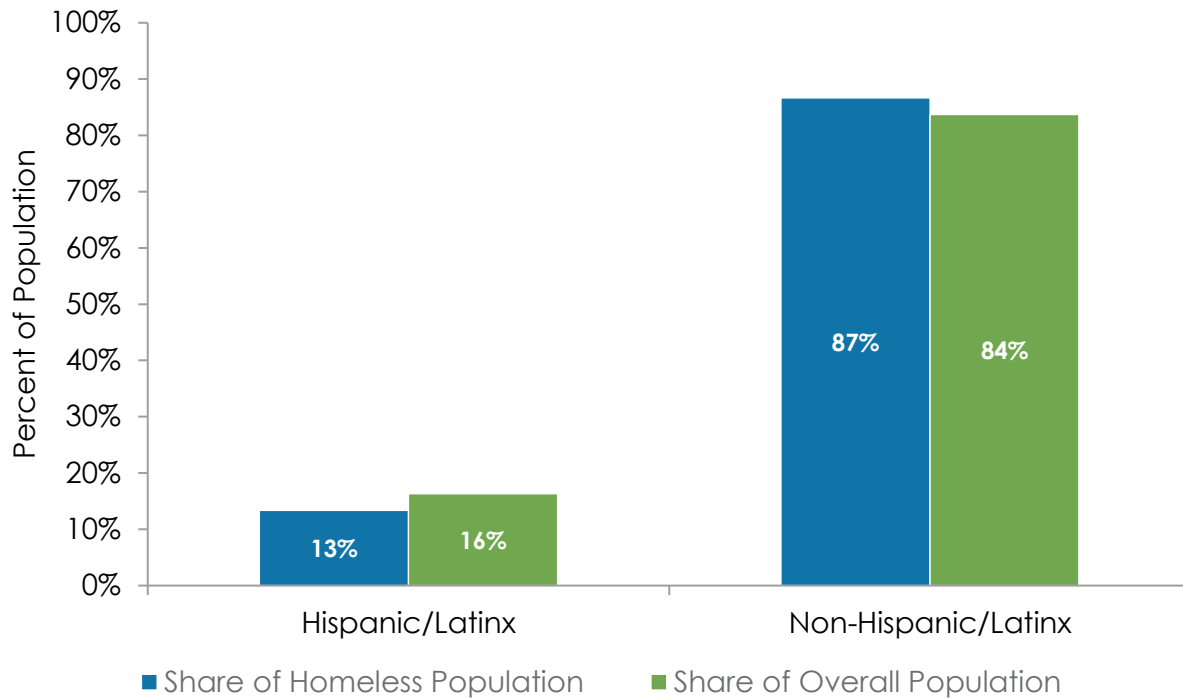
**Figure 28: Racial Group Share of General and Homeless Populations, Butte County**

*Universe: Population experiencing homelessness*

*Notes: This data is based on Point-in-Time (PIT) information provided to HUD by CoCs in the application for CoC Homeless Assistance Programs. The PIT Count provides a count of sheltered and unsheltered homeless persons on a single night during the last ten days in January. HUD does not disaggregate racial demographic data by Hispanic/Latinx ethnicity for people experiencing homelessness. Instead, HUD reports data on Hispanic/Latinx ethnicity for people experiencing homelessness in a separate table. Accordingly, the racial group data listed here includes both Hispanic/Latinx and non-Hispanic/Latinx individuals.*

*Source: U.S. Department of Housing and Urban Development (HUD), Continuum of Care (CoC) Homeless Populations and Subpopulations Reports (2019); U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B01001(A-I). For the data table behind this figure, please refer to the Data Packet Workbook, Table HOMELS-02.*

In Butte County, Latinx residents represent 13 percent of the population experiencing homelessness, while Latinx residents comprise 16 percent of the general population (see Figure 29).



**Figure 29: Latinx Share of General and Homeless Populations, Butte County**

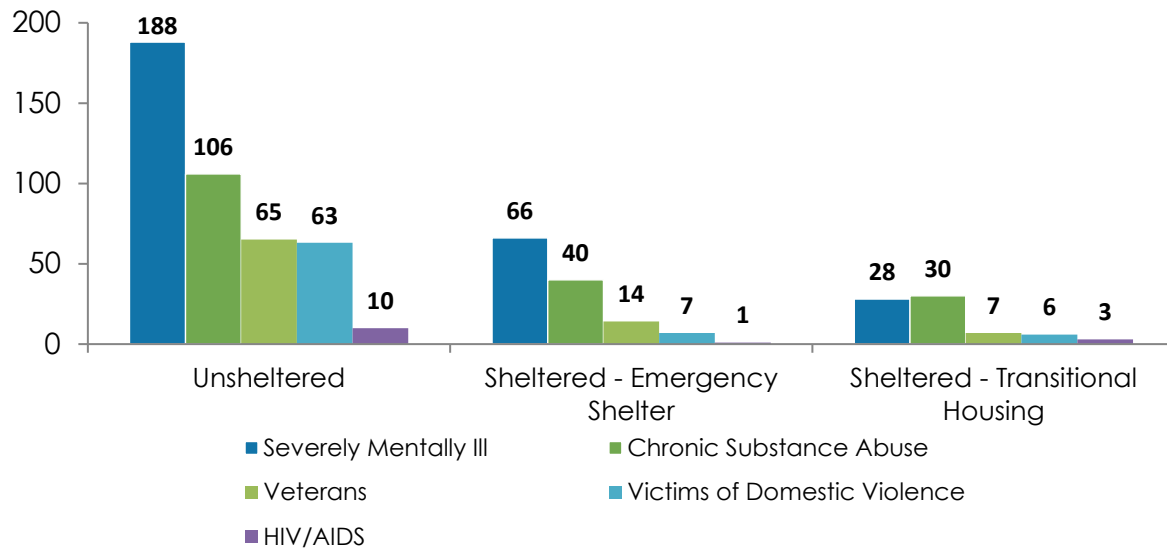
*Universe: Population experiencing homelessness*

*Notes: This data is based on Point-in-Time (PIT) information provided to HUD by CoCs in the application for CoC Homeless Assistance Programs. The PIT Count provides a count of sheltered and unsheltered homeless persons on a single night during the last ten days in January. The data from HUD on Hispanic/Latinx ethnicity for individuals experiencing homelessness does not specify racial group identity. Accordingly, individuals in either ethnic group identity category (Hispanic/Latinx or non-Hispanic/Latinx) could be of any racial background.*

*Source: U.S. Department of Housing and Urban Development (HUD), Continuum of Care (CoC) Homeless Populations and Subpopulations Reports (2019); U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B01001(A-I). For the data table behind this figure, please refer to the Data Packet Workbook, Table HOMELS-03.*

Many of those experiencing homelessness are dealing with severe issues – including mental illness, substance abuse and domestic violence – that are potentially life threatening and require additional assistance. In Butte County, homeless individuals are commonly challenged by severe mental illness, with 282 reporting this condition (see Figure 30). Of those, some 67 percent are unsheltered, further adding to the challenge of handling the issue.

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**Figure 30: Characteristics for the Population Experiencing Homelessness, Butte County**

Universe: Population experiencing homelessness

Notes: This data is based on Point-in-Time (PIT) information provided to HUD by CoCs in the application for CoC Homeless Assistance Programs. The PIT Count provides a count of sheltered and unsheltered homeless persons on a single night during the last ten days in January. Per HCD's requirements, jurisdictions will need to supplement this county-level data with local estimates of people experiencing homelessness. These challenges/characteristics are counted separately and are not mutually exclusive, as an individual may report more than one challenge/characteristic. These counts should not be summed.

Source: U.S. Department of Housing and Urban Development (HUD), Continuum of Care (CoC) Homeless Populations and Subpopulations Reports (2019).

For the data table behind this figure, please refer to the Data Packet Workbook, Table HOMEELS-04.

In Paradise, there were 353 reported students experiencing homelessness in the 2019-20 school year, a 110 percent increase from 2017-18 before the fire (see Table 3). By comparison, Butte County has seen a 50 percent increase in the population of students experiencing homelessness in the same time frame, adding undue burdens on learning and thriving, with the potential for longer term negative effects. As defined by the Department of Education, students are experiencing homelessness if they are unsheltered, living in temporary shelters for people experiencing homelessness, living in hotels/motels, or temporarily doubled up and sharing the housing of other persons due to the loss of housing or economic hardship.

**TABLE 3: STUDENTS IN LOCAL PUBLIC SCHOOLS EXPERIENCING HOMELESSNESS**

Academic Year	Town of Paradise	Butte County
2016-17	142	799
2017-18	168	882
2018-19	10	738
2019-20	353	1,314

Universe: Total number of unduplicated primary and short-term enrollments within the academic year (July 1 to June 30), public schools

Notes: The California Department of Education considers students to be homeless if they are unsheltered, living in temporary shelters for people experiencing homelessness, living in hotels/motels, or temporarily doubled up and sharing the housing of other persons due to the loss of housing or economic hardship. The data used for this table was obtained at the school site level, matched to a file containing school locations, geocoded and assigned to jurisdiction, and finally summarized by geography.

Source: California Department of Education, California Longitudinal Pupil Achievement Data System (CALPADS), Cumulative Enrollment Data (Academic Years 2016-2017, 2017-2018, 2018-2019, 2019-2020).

This table is included in the Data Packet Workbook as Table HOMEELS-05.



Finally, an analysis of mobile home park locations can help to identify disproportionate housing needs including displacement risk. According to HCD, people residing in mobile homes, residential trailers, or recreational vehicles (RVs) are the most vulnerable residential population to natural disasters including flooding. Emergency preparedness, response, and evacuation therefore calls for an inventory of mobile home park locations. Figure 31 shows locations that represent mobile home, residential trailer, and recreational vehicle (RV) parks in Butte County. Mobile home parks are generally concentrated in the communities of Chico, Paradise/Magalia, and Oroville/Thermalito/Palermo, with some mobile home parks located in less populated areas of the county. This map shows data from 2018 which is also the year of the 2018 Camp Fire in eastern Butte County. Many of the mobile home parks located in Paradise and Magalia were destroyed or damaged in the fire, with residents displaced to other housing units or communities according to the *Homeland Infrastructure Foundation Level Data database*.

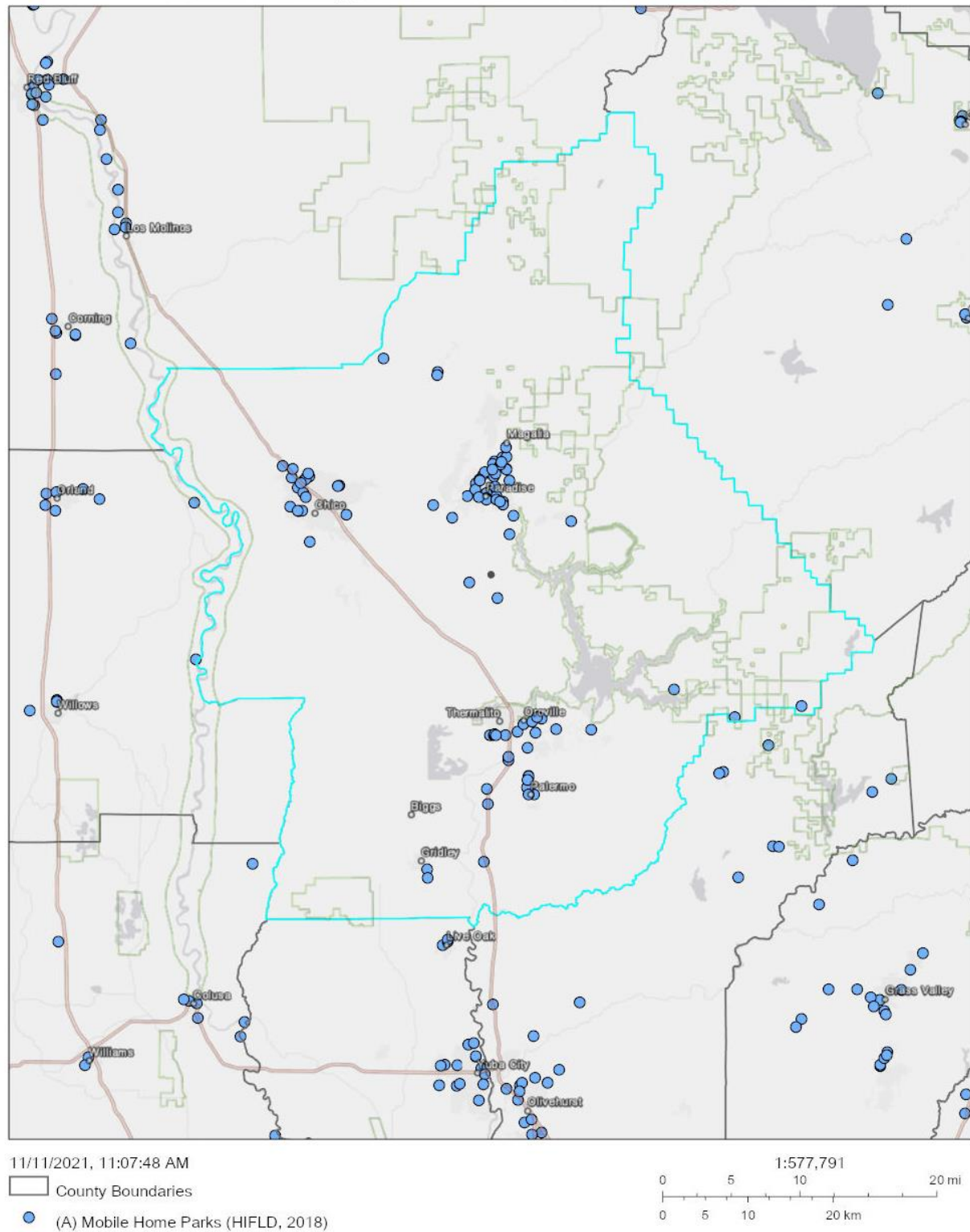
## LOCAL DATA AND KNOWLEDGE

Local data and knowledge from a variety of sources centers on the impacts of the 2018 Camp Fire on disproportionate housing needs and displacement risk in the Town of Paradise.

Prior to the 2018 Camp Fire, Paradise had more women, seniors, disabled and veterans than any other local jurisdiction, as well as the State or Country as a whole. In 2010, Paradise was home to approximately 13,765 women (52.5 percent of the population), 6,580 seniors (25.1 percent), 4,615 disabled persons (17.6 percent), and 2,600 veterans (9.9 percent). These populations represent protected classes under federal anti-discrimination law and are considered to be more vulnerable.

Perhaps due to the larger number of elderly and disabled, at this time the overall labor force as a percent of population (49.9 percent) was notably lower than that of the County (55.6 percent), the State (63.1 percent) or nation (63.3 percent). However, the Town did have the highest median household income (\$44,923) in the County, above Chico (\$42,342) and the County as a whole (\$43,444) but considerably lower than the State (\$61,818) and US (\$53,889). Interestingly, the per capita income (\$25,427), also the highest in the County, was closer to that of the State (\$30,318) and US (\$28,930). Although in 2010 the Town had the lowest percent of persons living in poverty (16.0 percent) within the County, that percent was still higher than that of the State (15.3 percent) and US (13.5 percent) at the time.

Through discussions and through relying on alternative data collected by Next 10 and UC Berkeley's Center for Community Innovation, it was revealed that seniors, low-income households, and renters were disproportionately affected and displaced by the Camp Fire, and that many people are eager to come back to Paradise and miss their home. This sentiment was expressed especially through interviews with CVI, a non-profit organization dedicated to providing residential and vocational support to developmentally disabled adults. CVI representatives shared that they often hear "I want to go back home." However, there are few units to come back to after the fire's destruction. CVI clients do not understand this. In addition to the lack of housing, the presence of services, especially medical services, is one issue impacting if or when past residents with a developmental disability may return.



**Figure 31: Butte County, Mobile Home Parks Map, 2018**

Source: HCD AFFH Data Resources and Mapping Tool: 2018 Homeland Infrastructure Foundation Level Data database

As discussed in the Paradise Safety Element, Paradise is at very high risk for future wildfire. Research has shown that renters, and especially low-income renters, are often disproportionately exposed to environmental hazards and housing tenure is a decisive factor in a society's vulnerability to disaster.<sup>5</sup> Housing tenure is such an important factor in disaster recovery because renters do not control the housing units in which they live. According to HCD, "renters bear the brunt of the existing affordable housing shortage, and their adaptive capacity to cope and recover from the impacts of environmental hazards may be reduced due to systemic inequities and limited resources." Renters are more likely to be displaced post-disaster because they do not determine if or when their housing unit will be rebuilt, there are fewer financial resources to rebuild rental housing than for homeowners, and renters are more likely to live in multi-family buildings that can take longer to rebuild post-disaster than a single-family home. Furthermore, renters do not control vegetation management and other fire risk reduction measures, or the ability to add resilience investments on the property where they live. Finally, rental prices increase as rental housing supply decrease.

Indeed, nearly all rental housing was destroyed in the fire. According to data from Urban Footprint, approximately 75 percent of parcels developed with multi-family housing and approximately 88 percent of all multi-family dwelling units were destroyed in the fire. The destruction included some of the Town's only deed-restricted affordable housing projects. One affordable project, Paradise Gardens III, is prioritized to be rebuilt and is expected to be completed in the next few years and another, Paradise Community Village, is actively under reconstruction. The Cypress Acres Convalescent Hospital, however, is the third project in the town with federal assistance that was destroyed, and it is not anticipated to rebuild. The Town has issued a certificate of occupancy for 242 units in multi-family buildings since the Camp Fire, all of which are rental housing units.<sup>6</sup> These 242 units represent approximately 32 percent of the approximately 750 multi-family units lost in the fire, according to data from Urban Footprint.

In addition to the availability of housing that is affordable, the lower incomes of the residents of Paradise (\$49,270), when compared to the average Californian (\$71,228), have implications regarding where those displaced by the Camp Fire will be able to relocate.<sup>7</sup> If the cost of rebuilding is too high, former Paradise residents may permanently move out of the state in search of cheaper housing options.

Whereas much of California faces displacement due to increasing housing prices, the situation in Paradise is unique because displacement took on a new meaning after the 2018 Camp Fire when most residents lost a home, place of work, and/or the same sense of community with such a large population loss. When individuals or families are forced to leave their homes and communities, they also lose their support network. Displacement has the most severe impacts on low- and moderate-income residents who had less savings to fall back on during the crisis. A report written by Next 10 and UC Berkeley's Center for Community Innovation, *Rebuilding for a Resilient Recovery: Planning in California's Wildland*

<sup>5</sup> Lee & Van Zandt, 2018. *Social Vulnerability to Disasters: A Review of the Evidence*.

<sup>6</sup> Hartman, Susan, Community Development Director, Town of Paradise. 2021. Personal communication with Urban Planning Partners. October 26. Updated based on permit counts as of December 29, 2021.

<sup>7</sup> Perry, Noel et al., 2021. "Rebuilding for a Resilient Recovery: Planning in California's Wildland Urban Interface." *Next10 and Center for Community Innovation. UC Berkeley*. Retrieved from: <https://www.next10.org/sites/default/files/2021-06/Next10-Rebuilding-Resilient.pdf>.

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Urban Interface, included Paradise as a case study and revealed important information on who was most affected by the fire:

- Before the fire, Paradise had a large population of retirees — 35 percent of residents were over 60 years old, and 7 percent were over 80 years old. Nearly 85 percent of those who perished in the fire.
- The Camp Fire displaced 13,314 households, and of those, 43 percent (5,679 households) had moved to a new census tract by 2019. Of those who moved census tracts, 38 percent (2,148 households) were senior-led households. Low-income households represented 41 percent of households that relocated, compared to 50 percent of households that stayed, indicating that lower-income households were less likely to move.
- While 34 percent of all households affected by the 2018 Camp Fire were renters, 40 percent of households that moved were renters. The average household income of households that moved was \$54,153, higher than \$49,974 for the households that did not move.

The report also revealed that most of those displaced from Paradise lived in their homes for generations and were more likely to live in a single-family home and own their home than else in California. Before the Camp Fire, approximately 70 percent of residents owned their homes, higher than the 55 percent homeownership rate statewide. The median home value of \$218,400 was nearly half the average home value in California, which is \$475,900. The lower incomes of the residents of Paradise (\$49,270), when compared to the average Californian (\$71,228) imply that many lived in Paradise due to the relatively lower housing costs, and with the high levels of destruction, low-income families may choose to permanently move out of the state in search of cheaper housing options elsewhere. These findings suggest that lower-income residents may not have the resources to relocate as easily as their higher-income peers, especially lower-income homeowners. Renters, seniors, and low-income households are special populations to consider when designing policies and programs to address displacement.

### OTHER RELEVANT FACTORS

Butte County Department of Employment and Social Services (Butte County DESS) administers employment and social services to Butte County residents. Butte County DESS provided its “Camp Fire Relief Grant Final Report, January 2019 through July 2021” for use in the City of Chico’s Housing Element on October 5, 2021 via email correspondence to the City, which is included in the Town of Paradise’s Housing Element as well due to its relevance. In January 2019, North Valley Community Foundation provided a one-million-dollar grant to Butte County DESS to assist 2018 Camp Fire survivors with housing, mental health, and replacing belongings. Table 4 depicts the dollar amount of assistance provided to Camp Fire survivors by assistance type. Vehicles and RVs, home repairs/rebuilds, rent and mortgage, and vehicle items/RV repair were the assistance types with the largest amount of assistance provided in dollars. These findings illustrate that both temporary and permanent housing was a significant need following the Camp Fire.

**TABLE 4: BUTTE COUNTY DEPARTMENT OF EMPLOYMENT AND SOCIAL SERVICES, FINANCIAL ASSISTANCE PROVIDED TO CAMP FIRE SURVIVORS TABLE, JANUARY 2019 TO JULY 2021**

<b>Assistance Type</b>	<b>Total Assistance Provided (in Dollars)</b>
Vehicles and RVs	\$289,978
Home Repairs/Rebuilds	\$214,806
Rent and Mortgage	\$170,031
Vehicle Items/RV Repair	\$165,540
Property Replacement	\$69,747
Shelter	\$55,166
Utilities	\$12,703
Deliveries	\$11,716
Miscellaneous	\$10,192
Total	\$999,968.70

Source: Butte County Department of Employment and Social Services, Camp Fire Relief Grant Final Report, January 2019 to July 2021.

Butte-Glenn 211 is an information and referral non-profit agency serving Butte and Glenn counties by connecting people in need with services that offer help. Table 5 depicts information on the number of Camp Fire contacts and referred services in Butte-Glenn 211's database system. From the time period of November 1, 2018 to October 31, 2021, the number of referred services to Camp Fire contacts who contacted Butte-Glenn 211 by phone from Butte County was 27,134. The total number of Camp Fire contacts to Butte-Glenn 211 originating from Butte County was 23,832 and the total number of Camp Fire contacts from all counties and states was 34,892 (Butte-Glenn 211, November 2021 Email Correspondence). This data illustrates the magnitude of the impact of the Camp Fire on Butte County residents. Over 30,000 people contacted Butte-Glenn 211 for assistance during and after the Camp Fire, and Butte-Glenn 211 referred over 25,000 services to Camp Fire phone callers contacts from Butte County.

**TABLE 5: BUTTE-GLENN 211, CAMP FIRE CONTACTS AND REFERRED SERVICES DATA TABLE, NOVEMBER 2018 TO OCTOBER 2021**

<b>Time Period</b>	<b>Number of Referred Services to Camp Fire Phone Caller Contacts Originating from Butte County</b>	<b>Total Number of Camp Fire Contacts Originating from Butte County</b>	<b>Total Number of Camp Fire Contacts to 211 (all counties/states)</b>
November 1, 2018 to October 31, 2021	27,134	23,832	34,892

Source: Butte-Glenn 211, City of Chico's Housing Element.

### 3 CONCLUSIONS AND SUMMARY OF ISSUES

In conclusion, the Town is paying close attention to any disparities by race, income, and other characteristics throughout the rebuild process. The Town is aware that renters, large families, and low-income households are experiencing more cost burden in their monthly housing costs, and that while there are not very many people of color living in the Town currently, Asian and Native Hawaiian or Other Pacific Islanders also appear to be facing higher degrees of cost burden. Helping people who have experienced displacement and homelessness, especially due to the Camp Fire, also remain a top priority for the Town. In Paradise, displacement took on a new meaning after the 2018 Camp Fire when most residents lost a home, place of work, and/or the same sense of community with such a large population loss. The large percentage of women, seniors, disabled persons, and veterans in the town prior to the Camp Fire has meant that these populations struggled disproportionately and will continue to need extra assistance throughout the rebuild process.

## F. FAIR HOUSING ACTION PLAN

Due to all the forces and findings described above, it is important that the Town of Paradise prioritize rebuilding rental housing and providing financial assistance for renters to return to the community and to facilitate integrated living patterns as old residents return and new residents arrive. The Town has several ongoing or upcoming planning efforts that present an opportunity to AFFH, including the sewer project, mastered ADU plans, SB 2 projects, the long-term community recovery plan, transportation master plan, and forthcoming General Plan update.

Chapter 6: Housing Element Goals, Policies and Programs describes the Town's goals and efforts to rebuild, conserve existing stock and affordability, and provide adequate housing for all persons. This 2022-2030's Housing Element goals, in tandem with the Safety Element, work to affirmatively further fair housing in Paradise. Specifically, the policies listed below seek to foster an inclusive community, further housing choice, and address racial and economic disparities by increasing the availability and diversity of housing, prioritizing multi-family housing in areas near services, enforcing fair housing laws, and establishing programs to house special needs groups (e.g., seniors, individuals with disabilities, large families, the unhoused).

- HP-1. The Town will encourage a full range of housing types, including both lower- and higher-density housing, at rents and sales prices suitable for a range of household incomes, including extremely low, very low, low, and moderate.
- HP-2. The General Plan will identify lands most suitable for multi-family development and safeguard this type of use on these sites.
- HP-6. The Town will encourage the production and availability of new affordable housing through a variety of measures including the density bonus program and second unit development, providing incentives such as expedited processing, relaxed zoning restrictions where appropriate, support for funding applications, and Community Development Block Grant (CDBG) funds when available.
- HP-8. The Town will encourage providers to give priority to the very low- and low-income housing developments pursuant to Government Code Section 65589.7. The Town will also provide a copy of the 2022–2030 Housing Element to local water providers upon its adoption.



Should a public sewer system, such as an off-site clustered system or alternative wastewater treatment system, be developed and made available, the Town will provide its operator with a copy of the Housing Element and encourage the operator to give priority to very low- and low-income housing developments pursuant to Government Code Section 65589.7.

- HP-9. The Town will pursue county, State, and federal programs and funding sources that provide housing opportunities for low- and moderate-income households.
- HP-10. In accordance with applicable federal and State laws, the Town will promote equal housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, or color.
- HP-12. The Town will pursue the development of tiny home villages to be used as affordable housing.
- HP-15. The Town will design and implement housing programs that maximize access to the market, such as housing rehabilitation, including replacement housing, and down payment assistance for first-time homebuyers.
- HP-17. New housing and rehabilitated housing will be constructed in accordance with design standards and Town-adopted Building Code requirements that will ensure the safety and integrity of each housing unit.
- HP-18. The Town will continue to provide a revolving loan fund for housing rehabilitation and down payment assistance programs.
- HP-19. The Town will support the continuance and expansion of the Housing Authority's rental assistance program.
- HP-20. The Town will regulate conversion of housing stock that, by its nature, is affordable to residents of modest means, such as apartments and mobile homes, to either market-rate, for-sale, or nonresidential uses, by requiring such conversions to provide a housing relocation plan and replacement assistance to residents who would be displaced by the conversion and by requiring that the Town make a finding of clear public benefit.
- HP-23. The Town will consider increased building and landscaping requirements for fire resiliency and add supportive programs to assist households with vegetation management. The Town will consider providing grants or no-interest loans to low-income households for home hardening to ensure the most vulnerable households are not left behind.
- HP-28. The Town will support post-disaster funding for multi-family and affordable housing development.
- HP-29. The Town will continue to encourage the development and expansion of housing opportunities for the elderly and the disabled through techniques such as smaller unit sizes, a reduction in parking space requirements, common dining facilities, and fewer but adequate amenities.
- HP-30. The Town will encourage development of suitable sites with rest homes and care facilities for the elderly and the disabled and developmentally disabled and will encourage senior citizen housing in the Central Commercial area of Paradise.

- HP-31. The Town will facilitate housing opportunities for the homeless by accommodating transitional and supportive housing and allowing emergency, transitional, and supportive housing consistent with state law.
- HP-32. The Town will encourage development housing types and programs for senior citizens, the disabled, developmentally disabled, large families, and other groups identified as having special housing needs.
- HP-33. The Town will continue to require the first floors of multi-family developments to accommodate access and use by the elderly and the disabled
- HP-34. The Town will continue to assess the Zoning Ordinance, Municipal Code, and Town procedures for constraints and address changes in state law, particularly regarding housing for special needs groups, including seniors, the disabled, developmentally disabled, large families, farmworkers, and the homeless.

In addition to the policies above, the Town of Paradise will take the meaningful actions found in Table 6.

TABLE 6: FAIR HOUSING ACTION PLAN

Actions	Fair Housing Issues	Contributing Factors	Implementation
<b>Action Area 1. Enhancing housing mobility strategies</b>			
<b>Action 1.1:</b> Incentivize the creation of ADUs to provide housing that is affordable in higher opportunity areas. If being used as a rental, persons using the Town's mastered ADU plans would be required to affirmatively market their ADU to populations with disproportionate housing needs, including persons with disabilities and female-headed households. This would include sharing information with community organizations that serve these populations. The Town will also affirmatively market the mastered ADU plans to low-income households for wealth-building purposes.	Persons with disabilities have disproportionate housing needs and a lack of affordable housing stock. Renters were disproportionately displaced by the Camp Fire.	Lack of affordable rental housing; lack of accessible affordable units.	<p><b>Objectives:</b> Increase housing mobility by generating wealth for low-income homeowners and by facilitating the development of ADUs that are affordable to lower-income households in areas with higher access to opportunity</p> <p><b>Quantified Objectives:</b> 12-15 ADUs created through the mastered ADU plans and 30-40 ADUs permitted during the Housing Element cycle</p> <p><b>Responsible Party:</b> Housing Services staff</p> <p><b>Timeline:</b> Ongoing</p>
<b>Action 1.2:</b> Continue to disallow the enforcement of Covenants, Conditions, and Restrictions (CC&Rs) given their potential to cause areas of affluence and exclusion. Continue to allow all housing types (e.g., stick built, modular, manufactured) in all residentially zoned areas.	Concentrated areas of poverty and/or concentrated areas of affluence can form when housing types are isolated and housing mobility is constrained. Across California and the nation, racial segregation has historically been promulgated through	Homogeneous population	<p><b>Objectives:</b> Increase housing mobility by allowing single-family homes at different prices points within the same neighborhoods.</p> <p><b>Quantified Objectives:</b> 350 manufactured homes permitted during the planning period in</p>



TABLE 6: FAIR HOUSING ACTION PLAN

Actions	Fair Housing Issues	Contributing Factors	Implementation
	CC&Rs.		neighborhoods throughout the town.  <b>Responsible Party:</b> Housing Services staff  <b>Timeline:</b> Ongoing
<b>Action Area 2. Encouraging new housing choices and affordability in high resource areas and outside of areas of concentrated poverty.</b>			
<b>Action 2.1:</b> Require affordable housing developments be affirmatively marketed to households with disproportionate housing needs, including persons with disabilities and female-headed households. This would include sharing information with community organizations that serve these populations, such as legal service or public health providers. All marketing plans would include strategies to reach groups with disproportionate housing needs.	Persons with disabilities have disproportionate housing needs and a lack of affordable housing stock. Neighborhoods with greater portions of non-White populations (i.e., downtown) have older housing stock.	Lack of affordable housing and especially affordable housing in high opportunity areas; Lack of accessible affordable units.	<b>Objectives:</b> Encouraging new housing choices and affordability  <b>Quantified Objectives:</b> Affordable housing projects and available affordable units are advertised to at least three community organizations  <b>Responsible Party:</b> Housing Services staff  <b>Timeline:</b> Ongoing. Marketing plans are submitted at time of building inspection.
<b>Action 2.2:</b> Allow residential care facilities for seven or more person by-right in the sewer service area. This will make it easier to develop needed housing for special needs populations and ensure that these facilities are located in areas with access to commercial services, near evacuation routes, and with adequate sewer capacity.	Persons with disabilities have disproportionate housing needs and housing for persons with disabilities has not yet been rebuilt to replace units that were in Paradise pre-fire.	Lack of accessible affordable units; Lack of access to economic opportunity; Camp Fire.	<b>Objectives:</b> Encouraging new housing choices and affordability for populations with special needs housing  <b>Quantified Objectives:</b> Development of 80 housing units for extremely- and very low-income households in the sewer service area.  <b>Responsible Party:</b> Planning Department  <b>Timeline:</b> Amend Zoning Ordinance by January 2025.
<b>Action 2.3:</b> Utilize zoning tools to facilitate the construction of diverse housing types and a mix of uses within the sewer service area. This will increase access to opportunity by increasing the number of people who live in proximity to transit and services within the sewer service area. Encouraging mixed-income housing and diverse housing types will continue to facilitate integrated living patterns. Consistent with program HI-4, the Town could use changes to its fee structure and/or parking standard revisions to incentive	Paradise has constrained access to jobs given its rural nature. Reliance on septic systems constrains densities, creating barriers for deed-restricted multi-family housing units.	Lack of affordable units; Lack of access to economic opportunity; infrastructure constraints.	<b>Objectives:</b> Encouraging new housing choices and affordability  <b>Quantified Objectives:</b> Development of 80 housing units for extremely- and very low-income households in the sewer service area. Construction of mixed-use buildings in the sewer service area.

TABLE 6: FAIR HOUSING ACTION PLAN

Actions	Fair Housing Issues	Contributing Factors	Implementation
active ground floor uses below residential units.			<p><b>Responsible Party:</b> Planning Division</p> <p><b>Timeline:</b> June 2024 for mixed-use incentives and January 2025 for rezoning parcels with the Sewer Overlay Zone.</p>
<p><b>Action 2.4:</b> Utilize an equity lens in the upcoming General Plan update as well as the ongoing implementation of the Long-Term Community Recovery Plan. This includes ensuring an equitable community engagement process is implemented to capture feedback from historically excluded communities.</p>	Upcoming planning efforts and the rebuild process present an opportunity to ensure all protected classes are participating	The Town has historically not been very racially diverse, but does have high proportion of other protected classes	<p><b>Objectives:</b> Encouraging new housing choices and affordability</p> <p><b>Quantified Objectives:</b> Participation amongst people of color and those in protected classes increases 10 percent from the first engagement activity to the last</p> <p><b>Responsible Party:</b> Planning Department</p> <p><b>Timeline:</b> Ongoing between 2023-2025 during the General Plan Update.</p>
<b>Action Area 3. Improving place-based strategies to encourage community conservation and revitalization including preservation of existing affordable housing.</b>			
<p><b>Action 3.1:</b> Continue to fund minor home repairs for income-eligible households through the owner-occupied rehab program. Work with FEMA to establish a grant program for home hardening retrofits.</p>	Low-income households need resources for housing conservation.	The Camp Fire - housing stock that survived the fire are scattered across town and are not place based. However, they are in need of community conservation and revitalization.	<p><b>Objectives:</b> Conserve and improve assets in areas of lower opportunity and concentrated poverty.</p> <p><b>Quantified Objectives:</b> Rehabilitation of 40 homes in target neighborhoods.</p> <p><b>Responsible Party:</b> Housing Division</p> <p><b>Timeline:</b> Conduct publicity campaign for the program once annually in addition to hosting information on Town website.</p>
<p><b>Action 3.2:</b> Target accessibility upgrades in areas with greatest need. Implement the Transportation Master Plan (TMP) to prioritize intersection improvements where ADA upgrades are needed.</p>	Persons with disabilities face disproportionate housing impacts.	Community wide lack of sidewalks because of rural nature of Town.	<p><b>Objectives:</b> Place-based infrastructure improvements to increase access for persons with disability</p> <p><b>Quantified Objectives:</b> All intersections are ADA compliant</p>

TABLE 6: FAIR HOUSING ACTION PLAN

Actions	Fair Housing Issues	Contributing Factors	Implementation
			<p><b>Responsible Party:</b> Public Works Department</p> <p><b>Timeline:</b> During public road repaving project from August 2022 through 2025.</p>
<b>Action Area 4. Protecting existing residents from displacement</b>			
<p><b>Action 4.1:</b> Through partnerships with the Paradise Ridge and Butte County Fire Safe Councils explore home hardening programs that allow policyholders to lower their insurance rates through home hardening, vegetation management, or other risk reduction measures. Implement an equitable community engagement strategy and work with key stakeholders to identify Wildfire Risk Reduction Buffers to protect homes from the areas with greatest fire risk.</p>	<p>All residents are at risk of displacement from climate hazards. Impacts are greatest for those who are already underserved or experiencing disproportionate housing impacts.</p>	Wildfire risk	<p><b>Objectives:</b> Protect residents from future wildfire-related displacement.</p> <p><b>Responsible Party:</b> Planning Division and Fire Department</p> <p><b>Timeline:</b> . Meeting on Wildfire Risk Reduction Buffers by January 2023. Community engagement plan on Wildfire Risk Reduction Buffers by August 2023.</p>

## APPENDIX B

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# APPENDIX C: TOWN OF PARADISE GENERAL PLAN DESIGNATIONS AND ZONING DISTRICTS



## PARADISE GENERAL PLAN

The Paradise General Plan provides a range of residential building types and densities in various areas of Paradise. Densities range from a low of one unit or less per acre in the Agricultural-Residential designation to 15 units per acre in the Multi-Family designation. Below is a brief description of each General Plan residential land use designation.

### AGRICULTURAL-RESIDENTIAL (A-R)

This designation applies to existing and planned residential areas characterized by larger parcels and accessory agricultural uses, including the raising of livestock and other forms of agricultural production. It provides for single-family detached homes, limited agricultural uses, churches, and public uses. Residential densities are in the range of one or less dwelling unit per gross acre. This designation is mainly applied to areas in the southern portion of town characterized by larger parcels and existing agricultural/residential land uses. The minimum lot area for this designation is 1 acre.

### RURAL-RESIDENTIAL (R-R)

This designation applies to a substantial portion of existing and planned single-family rural residential areas in the town. It is characterized by moderately large parcels and residential densities that range from 1 to 2 dwelling units per acre. This designation provides for single-family detached homes and secondary residential units as well as accessory rural uses. It may also provide for churches and public uses.

### TOWN-RESIDENTIAL (T-R)

This designation applies to existing residential areas characterized by small (0.5 gross acres or less) parcels and the absence of accessory rural uses, particularly the keeping of livestock. It provides for single-family detached and attached homes, mobile home parks, churches, and public uses. These designated areas may be served by a community sewer system if established. Residential densities are in the range of 1 to 3 dwelling units per gross acre. Mobile home parks with densities no greater than six dwelling units per gross acre may also be deemed consistent with this designation.

### MULTI-FAMILY RESIDENTIAL (M-R)

This designation applies to existing and planned multiple-family residential areas. It provides for single- and multiple-family residential structures, mobile home parks, convalescent homes, residential care facilities, churches, and public uses. Planned multi-family residential areas shall be located in areas near existing or planned commercial uses, community service uses, and along designated arterial or collector streets. Depending on the presence and application of constraints, maximum potential residential densities up to 15 dwelling units per acre are allowed if served by an approved clustered wastewater treatment and disposal system. Mobile home parks with densities no greater than 8 dwelling units per gross acre may also be deemed consistent with this designation.

## APPENDIX C

### NEIGHBORHOOD-COMMERCIAL (N-C)

This designation applies to existing and planned neighborhood and locally oriented commercial retail and service uses. This designation is primarily applied to small sites adjacent to residential neighborhoods and along designated arterial or collector streets. Single-family residential structures, accessory dwelling units, convalescent homes, and residential care facilities are permitted uses with Town approval and issuance of a site plan review or by conditional use permit.

### CENTRAL-COMMERCIAL (C-C)

This designation provides for retail and service uses, public uses, professional and administrative office uses, and multiple-family residential uses. This designation is applied only to the central commercial (downtown or core) area of Paradise and is intended to accommodate visitor-oriented as well as locally oriented commercial uses and mixed uses that conform to an adopted architectural design theme and guidelines. Maximum potential residential densities cannot exceed 15 dwelling units per gross acre if served by an approved clustered wastewater treatment and disposal system.

### TOWN-COMMERCIAL (T-C)

This designation provides for a full range of locally and regionally oriented commercial uses, including retail, retail centers, wholesale, storage, hotels and motels, restaurants, service stations, automobile sales and service, light fabrication, professional and administrative offices, churches, and public uses. This classification is applied to existing moderate- to high-intensity commercial uses that are suitable for infill and to areas located at the intersection of designated arterial and/or collector streets. Maximum potential residential densities cannot exceed 10 dwelling units per gross acre.

### COMMUNITY-SERVICE (C-S)

This designation provides for private uses that serve a community purpose or benefit the community. These uses include private hospitals, medical offices, schools, residential care facilities and day care facilities (other than those located in private residences), convalescent homes, emergency shelters and transitional housing, auditoriums and other places of assembly, senior citizen and youth centers, clubs and lodges, private utilities and facilities, and airports. This designation is primarily applied to existing or planned uses of this nature throughout the primary study area. Depending on the presence and application of constraints, maximum potential residential densities cannot exceed 15 dwelling units per gross acre if served by an approved clustered wastewater treatment and disposal system.

## ZONING ORDINANCE

The Zoning Ordinance classifies the following types of residential uses that may be permitted in a zone:

**Single-family residential** – Means use of a site for only one dwelling unit and its allowed accessory uses, or for one primary dwelling unit and 1 secondary dwelling.

**Two-family residence** – Means use of a site for two dwelling units, either in the same building or in separate buildings, except when one of the dwelling units is a secondary dwelling.



**Multiple-family residential** – Means use of a site for three or more dwelling units, in one or more buildings, including units intended for individual ownership together with common areas or facilities.

**Secondary dwelling** – Means an attached or detached residential dwelling unit that provides independent living facilities (i.e., provisions for living, sleeping, eating, cooking, and sanitation) for one or more people and is located on a site with a proposed or existing primary dwelling. Secondary dwellings are allowed on the same parcel as single-family homes or multi-family buildings. Efficiency units and manufactured homes can be types of secondary dwellings.

**Accessory Dwelling** – Means a dwelling unit accessory to a *nonresidential* principal use on the same site, intended for occupancy by the landowner or a person employed on the site for security, maintenance, or management purposes.

**Mobile/manufactured home** – Means a transportable factory-built housing unit designed and equipped for use as a dwelling unit with or without a permanent foundation. A mobile/manufactured home may include two or more sections separately transported and joined together as one integral unit. A mobile home shall not include a recreational vehicle.

**Mobile home park** – Means a unified residential development with two or more mobile home spaces, together with internal streets, common areas, and facilities for parking, recreation, laundry, utility, storage, or other services for the residents.

**Group residential** – Means residential occupancy of dwelling units or sleeping units by groups of more than six persons not defined as a family. Typical uses include rooming or boarding, dormitories, residence halls, and fraternity and sorority houses.

**Community care facility** – Means a facility, place, or building that is maintained and operated to provide nonmedical residential care, adult day care, child day care, intermediate care, congregate living, health care, or home-finding agency services for children, adults, or children and adults, including but not limited to the physically handicapped, mentally impaired, or incompetent persons and does not include drug recovery facilities.

**Community care facility, limited** – Means a community care facility that provides service for six or fewer persons, with the residents and operators of the facility being considered a family.

**Day care home, large family** – Means a family day care home facility in the provider's own residence that provides family day care for 7 to 14 children, including children under the age of 10 years who reside at the home.

**Day care home, small family** – Means a family day care home facility in the provider's own residence that provides family day care for eight or fewer children, including children under the age of 10 years who reside at the home.

**Emergency shelters** – Means facilities providing emergency shelter to homeless individuals or others in need of shelter. These accommodations include lodging and may include the following as ancillary uses: meals, laundry facilities, bathing, counseling, and other support services.

The Zoning Ordinance identifies 10 residential districts (Agricultural Residential, Rural Residential, Town Residential, and Multi-family Residential and their respective subzones) and 6 other zones (Agricultural, Neighborhood Commercial, Central Business, Community Commercial, Community Facilities, and Community Services) that allow residential development. Some zones have varying zoning treatments, or sub-zones. Below is a brief description of each zoning district.

### RESIDENTIAL ZONES

**Agricultural Residential (AR) Zones** – The Agricultural Residential zone is intended for land areas that are planned or are existing residential areas characterized by larger parcels and accessory agricultural land uses, including raising of livestock and other forms of agricultural production. The Agricultural Residential-1, Agricultural Residential-3, and Agricultural Residential-5 zones are consistent with the Agricultural-Residential (A-R) land use designation of the Paradise General Plan. The Agricultural Residential-3 and Agricultural Residential-5 zones are also consistent with the Open-Space/Agricultural land use designation of the Paradise General Plan.

**Rural Residential (RR) Zones** – The Rural Residential zone is intended for land areas that are planned or are existing single-family rural residential areas characterized by moderately large parcels and with residential densities that range from 1 to 2 dwelling units per acre. The RR-1, RR-2/3, and RR-1/2 zones are consistent with the Rural-Residential (R-R) land use designation of the Paradise General Plan.

**Town Residential (TR) Zones** – The Town Residential zone is intended for land areas that are planned or are existing single-family residential areas characterized by small (0.5 gross acres or less) parcels and the absence of accessory rural land uses, particularly the keeping of livestock. The TR-1, TR-1/2, and TR-1/3 zones are consistent with the Town Residential (T-R) land use designation of the Paradise General Plan.

**Multiple-Family Residential (M-F) Zones** – The Multiple-Family Residential zone is intended for land areas that are planned or existing multiple-family residential areas. Depending on the presence and application of constraints, maximum potential residential densities cannot exceed 15 dwelling units per acre and eight dwelling units per acre in mobile home parks. The Multiple-Family Residential zone is consistent with the Multi-Family Residential (M-R) land use designation of the Paradise General Plan.

### OTHER ZONES THAT ALLOW RESIDENTIAL USES

**Central-Business (C-B) Zone** – The Central-Business zone is intended for land areas located in the central commercial (downtown or core) area of Paradise and that provide for commercial retail and service uses, public uses, professional and administrative office uses, and multiple-family residential uses. The Central-Business zone is consistent with the Central-Commercial (C-C) land use designation of the Paradise General Plan and is potentially consistent with the Town-Commercial (T-C) Paradise General Plan land use designation.

**Community-Facilities (C-F) and Community-Services (C-S) Zones** – The Community-Facilities and Community-Services zones are intended for land areas that are planned to or already provide for public and public institutional land uses or private land uses which serve a community purpose or benefit the community. The Community-Facilities zone is consistent with the Public-Institutional (P-I), Community-Service (C-S), and Recreational (R) land use designations of the Paradise General Plan. The

Community-Services zone is consistent with the Community-Service (C-S) and Recreational (R) land use designations of the Paradise General Plan. In addition, the Community-Services zone is potentially consistent with the Multi-Family Residential (M-R) land use designation of the Paradise General Plan.

**Agricultural-10 (AG-10) and Agricultural-20 (AG-20) Zone** – The Agricultural-10/20 (AG-10, AG-20) zones are intended for land areas planned and deemed suitable to remain in their natural, primarily undeveloped state or to be used for open space and agricultural purposes. Such land areas can also be deemed inappropriate for urban development due to steep slopes, a significant lack of public services, and a substantial desire to retain existing agricultural or open space characteristics. The Agricultural-10 and Agricultural-20 zones are consistent with the Open-Space/Agricultural land use designation of the Paradise General Plan.

**Community-Commercial (C-C) Zone** – The Community-Commercial zone is intended for land areas that are planned or are providing a full range of locally and regionally oriented commercial land uses, including retail, retail centers, wholesale, storage, hotels and motels, restaurants, service stations, automobile sales and service, professional and administrative offices, etc. Depending on the presence and application of constraints, maximum potential residential densities shall not exceed 10 dwelling units per acre. The Community-Commercial zone is consistent with the Town-Commercial (T-C) land use designation of the Paradise General Plan and is potentially consistent with the Community-Service (C-S) Paradise General Plan land use designation.

**Neighborhood-Commercial (N-C) Zone** – The Neighborhood-Commercial zone is intended for land areas that are characterized by existing and planned neighborhood and locally oriented commercial retail and service uses. This zone is primarily applied to small sites adjacent to residential neighborhoods and along designated arterial or collector streets. The Neighborhood-Commercial zone is consistent with both the Neighborhood-Commercial (N-C) and the Town-Commercial (T-C) land use designations of the Paradise General Plan.

## COMBINING ZONES

**Planned Development Combining (P-D) Zone** – The purpose of the Planned Development Combining zone is to allow the establishment of planned developments with flexibility in the design of development projects; to promote economical and efficient use of the land, an increased level of urban amenities, and preservation of the natural environment; and to provide for phased completion of planned development projects.

## APPENDIX C

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## APPENDIX D: SITES INVENTORY, Sewer Scenario

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Optional Information1	Optional Information2
PARADISE	8634 SKYWAY	95969	051-102-047-000		TR	TR 1/3	0	2	2.29	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	Previous use (pre-fire) was COMMERCIAL	Maximum density of 2 is per site (not per acre)
PARADISE	1017 ROCHELLE LN	95969	051-164-040-000		MR	MF	0	30	0.26	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0		
PARADISE	3631 CONNIE CIR APT B	95969	051-440-002-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3631 CONNIE CIR APT C	95969	051-440-003-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3631 CONNIE CIR APT D	95969	051-440-004-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3619 CONNIE CIR APT A	95969	051-440-005-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3619 CONNIE CIR APT B	95969	051-440-006-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3619 CONNIE CIR APT C	95969	051-440-007-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3619 CONNIE CIR APT D	95969	051-440-008-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3605 CONNIE CIR APT A	95969	051-440-009-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3605 CONNIE CIR APT B	95969	051-440-010-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3605 CONNIE CIR APT C	95969	051-440-011-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3605 CONNIE CIR APT D	95969	051-440-012-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3593 CONNIE CIR APT A	95969	051-440-013-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3593 CONNIE CIR APT B	95969	051-440-014-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3593 CONNIE CIR APT C	95969	051-440-015-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3593 CONNIE CIR APT D	95969	051-440-016-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3606 CONNIE CIR APT A	95969	051-440-017-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3606 CONNIE CIR APT B	95969	051-440-018-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3606 CONNIE CIR APT C	95969	051-440-019-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3606 CONNIE CIR APT D	95969	051-440-020-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3622 CONNIE CIR APT A	95969	051-440-021-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3622 CONNIE CIR APT B	95969	051-440-022-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3622 CONNIE CIR APT C	95969	051-440-023-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3622 CONNIE CIR APT D	95969	051-440-024-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3549 CONNIE CIR APT A	95969	051-440-025-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3549 CONNIE CIR APT B	95969	051-440-026-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3549 CONNIE CIR APT C	95969	051-440-027-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3549 CONNIE CIR APT D	95969	051-440-028-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3559 CONNIE CIR APT A	95969	051-440-029-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3559 CONNIE CIR APT B	95969	051-440-030-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3559 CONNIE CIR APT C	95969	051-440-031-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3559 CONNIE CIR APT D	95969	051-440-032-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3569 CONNIE CIR APT A	95969	051-440-033-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3569 CONNIE CIR APT B	95969	051-440-034-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3569 CONNIE CIR APT C	95969	051-440-035-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3569 CONNIE CIR APT D	95969	051-440-036-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3581 CONNIE CIR APT A	95969	051-440-037-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3581 CONNIE CIR APT B	95969	051-440-038-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3581 CONNIE CIR APT C	95969	051-440-039-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3581 CONNIE CIR APT D	95969	051-440-040-000	A	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	5754 BLACK OLIVE DR	95969	052-143-002-000	MR	MF	MF	0	30	0.21	Vacant	YES - Planned	NO - Privately-Owned	Available	Used in Prior Housing Element - NonVacant	0	0	2	2		
PARADISE	5848 BLACK OLIVE DR	95969	052-160-016-000	MR	MF	MF	0	30	0.27	Vacant	YES - Planned	NO - Privately-Owned	Available	Used in Prior Housing Element - NonVacant	0	2	2	4		
PARADISE	5995 MAXWELL DR	95969	053-030-020-000	MR	MF	MF	0	30	0.44	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	2	2	4		
PARADISE	5979 MAXWELL DR	95969	053-030-023-000	MR	MF	MF	0	30	0.17	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1		
PARADISE	6075 MAXWELL DR	95969	053-030-036-000	MR	MF	MF	0	30	0.2	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3		
PARADISE	5975 MAXWELL DR APT 2	95969	053-380-002-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 3	95969	053-380-003-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 4	95969	053-380-004-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 5	95969	053-380-005-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 6	95969	053-380-006-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	

## APPENDIX D: SITES INVENTORY, Sewer Scenario

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Optional Information1	Optional Information2
PARADISE	5975 MAXWELL DR APT 7	95969	053-380-007-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 8	95969	053-380-008-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 9	95969	053-380-009-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 10	95969	053-380-010-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 11	95969	053-380-011-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 12	95969	053-380-012-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 13	95969	053-380-013-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 14	95969	053-380-014-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 15	95969	053-380-015-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 16	95969	053-380-016-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 17	95969	053-380-017-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 18	95969	053-380-018-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 19	95969	053-380-019-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 20	95969	053-380-020-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 21	95969	053-380-021-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 22	95969	053-380-022-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 23	95969	053-380-023-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 24	95969	053-380-024-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 25	95969	053-380-025-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 26	95969	053-380-026-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 27	95969	053-380-027-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 28	95969	053-380-028-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 29	95969	053-380-029-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 30	95969	053-380-030-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 31	95969	053-380-031-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 32	95969	053-380-032-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 33	95969	053-380-033-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 34	95969	053-380-034-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 35	95969	053-380-035-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 36	95969	053-380-036-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 37	95969	053-380-037-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 38	95969	053-380-038-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 39	95969	053-380-039-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 40	95969	053-380-040-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 41	95969	053-380-041-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 42	95969	053-380-042-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 43	95969	053-380-043-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 44	95969	053-380-044-000	E	MR	MF	0	30	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0				This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5998 WILLIAMS DR	95969	053-080-034-000		MR	MF	0	30	0.29	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	2	2	4	Previous use (pre-fire) was SINGLE FAMILY RESIDENCE	
PARADISE	5734 BLACK OLIVE DR	95969	052-143-001-000		MR	MF	0	30	0.28	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	2	2	4	Previous use (pre-fire) was SINGLE FAMILY RESIDENCE	
PARADISE	5989 MAXWELL DR	95969	053-030-021-000		MR	MF	0	30	0.34	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	3	3	6	Previous use (pre-fire) was SINGLE FAMILY RESIDENCE	
PARADISE	6003 MAXWELL DR	95969	053-030-019-000		MR	MF	0	30	0.48	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	4	4	8	Previous use (pre-fire) was SINGLE FAMILY RESIDENCE	
PARADISE	6029 MAXWELL DR	95969	053-030-031-000		MR	MF	0	30	0.46	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	4	4	8	Previous use (pre-fire) was SINGLE FAMILY RESIDENCE	
PARADISE	772 WILLOW ST	95969	052-160-004-000		MR	MF	0	30	0.21	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	Previous use (pre-fire) was SINGLE FAMILY RESIDENCE	
PARADISE	758 WILLOW ST	95969	052-160-002-000		MR	MF	0	30	0.21	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	Previous use (pre-fire) was SINGLE FAMILY RESIDENCE	
PARADISE	773 WILLOW ST	95969	052-160-010-000		MR	MF	0	30	0.19	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	Previous use (pre-fire) was SINGLE FAMILY RESIDENCE	
PARADISE	5772 BLACK OLIVE DR	95969	052-143-003-000		MR	MF	0	30	0.41	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	3	3	6	Previous use (pre-fire) was SINGLE FAMILY RESIDENCE	
PARADISE	5798 BLACK OLIVE DR	95969	052-143-004-000		MR	MF	0	30	0.23	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	2	2	4	Previous use (pre-fire) was SINGLE FAMILY RESIDENCE	



APPENDIX D: SITES INVENTORY, Sewer Scenario

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Optional Information1	Optional Information2
PARADISE	5806 BLACK OLIVE DR	95969	052-143-005-000		MR	MF	0	30	0.17	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	Previous use (pre-fire) was SINGLE FAMILY RESIDENCE	
PARADISE	5826 BLACK OLIVE DR	95969	052-143-006-000		MR	MF	0	30	0.2	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	Previous use (pre-fire) was SINGLE FAMILY RESIDENCE	
PARADISE	3631 CONNIE CIR APT A	95969	051-440-001-000	A	MR	MF	0	30	9.8	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	18	48	188	254	https://www.estately.com/listings/info/3600-connie-circle for "just under 10-acre site"	
PARADISE	6186 CENTER ST	95969	052-040-084-000		MR	MF	0	30	2.29	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	4	11	44	59		
PARADISE	766 EDWARDS LN APT A	95969	052-040-092-000		MR	MF	0	30	3.46	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	6	17	66	89		
PARADISE	6055 MAXWELL DR	95969	053-030-045-000	C	MR	MF	0	30	0.95	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	1	3	12	16	Made up of condo parcels.	
PARADISE	931 ELLIOTT RD	95969	053-111-034-000		MR	MF	0	30	4.35	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	8	21	83	112	former church site	
PARADISE	5975 MAXWELL DR APT 1	95969	053-380-001-000	E	MR	MF	0	30	6.5	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	12	32	124	168	Central Park Condominiums: 6.5 acres - https://www.landandfarm.com/property/6_52_Acres in Butte County-10254839/	
PARADISE	8764 SKYWAY	95969	050-070-082-000		MR	MF	0	30	3.12	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	5	15	59	79	Previous use (pre-fire) was COMMERCIAL	
PARADISE	9115 SKYWAY	95969	050-040-001-000		MR	MF	0	30	1.3	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	2	4	16	22	Previous use (pre-fire) was SINGLE FAMILY RESIDENCE	
PARADISE	9101 SKYWAY	95969	050-040-002-000		MR	MF	0	30	1	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	1	3	12	16	Previous use (pre-fire) was SINGLE FAMILY RESIDENCE	
PARADISE	9089 SKYWAY	95969	050-040-003-000		MR	MF	0	30	0.51	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	6	7	Previous use (pre-fire) was SINGLE FAMILY RESIDENCE	
PARADISE	9079 SKYWAY	95969	050-040-147-000		MR	MF	0	30	1.12	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	2	5	21	28	Previous use (pre-fire) was RETAIL	
PARADISE	5726 BLACK OLIVE DR	95969	052-143-010-000		MR	MF	0	30	0.66	Vacant	YES - Planned	NO - Privately-Owned	Available	Used in Prior Housing Element - NonVacant	1	2	8	11	Previous use (pre-fire) was SINGLE FAMILY RESIDENCE	
PARADISE	5500 CLARK RD	95969	054-080-038-000		MR	MF	0	30	6.18	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	11	30	118	159	Previous use (pre-fire) was COMMERCIAL	
PARADISE	5436 CLARK RD	95969	054-120-021-000		MR	MF	0	30	18.58	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	167	167	334	Previous use (pre-fire) was COMMERCIAL	
PARADISE	6035 MAXWELL DR	95969	053-030-041-000		MR	MF	0	30	0.53	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	1	1	6	8	Previous use (pre-fire) was SINGLE FAMILY RESIDENCE	
PARADISE	6025 MAXWELL DR	95969	053-030-017-000		MR	MF	0	30	0.54	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	1	1	6	8	Previous use (pre-fire) was SINGLE FAMILY RESIDENCE	
PARADISE	6015 MAXWELL DR	95969	053-030-018-000		MR	MF	0	30	0.54	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	1	1	6	8	Previous use (pre-fire) was SINGLE FAMILY RESIDENCE	
PARADISE	1340 BILLE RD	95969	053-150-103-000		MR	MF	0	30	10.79	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	97	97	194	Previous use (pre-fire) was COMMERCIAL	
PARADISE	6240 CLARK RD	95969	053-040-040-000		MR	MF	0	30	1	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	1	4	19	24	Previous use (pre-fire) was COMMERCIAL	
PARADISE	6254 CLARK RD	95969	053-040-041-000		MR	MF	0	30	0.69	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	1	2	8	11	Previous use (pre-fire) was SINGLE FAMILY RESIDENCE	
PARADISE	780 WILLOW ST	95969	052-160-011-000		MR	MF	0	30	0.52	Vacant	YES - Planned	NO - Privately-Owned	Available	Used in Prior Housing Element - NonVacant	0	1	6	7	Previous use (pre-fire) was SINGLE FAMILY RESIDENCE	
PARADISE	759 WILLOW ST	95969	052-160-013-000		MR	MF	0	30	2.45	Vacant	YES - Planned	NO - Privately-Owned	Available	Used in Prior Housing Element - NonVacant	4	8	31	43	Previous use (pre-fire) was SINGLE FAMILY RESIDENCE	
PARADISE	5838 BLACK OLIVE DR	95969	052-160-015-000		MR	MF	0	30	3.35	Vacant	YES - Planned	NO - Privately-Owned	Available	Used in Prior Housing Element - NonVacant	6	16	64	86	Previous use (pre-fire) was COMMERCIAL	
PARADISE	6799 SKYWAY	95969	052-060-013-000		MR	MF	0	30	3.5	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	6	17	67	90	Previous use (pre-fire) was COMMERCIAL	
PARADISE	1368 GARNET LN	95969	050-190-039-000		MR	MF	0	30	10.96	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	98	98	196	Previous use (pre-fire) was COMMERCIAL	
PARADISE	1280 WAGSTAFF RD	95969	050-190-053-000		MR	MF	0	30	12.48	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	112	112	224	Previous use (pre-fire) was COMMERCIAL	
PARADISE	1047 ROCHELLE LN	95969	051-164-039-000		MR	MF	0	30	0.69	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	1	2	8	11	Previous use (pre-fire) was SINGLE FAMILY RESIDENCE	
PARADISE	7726 SKYWAY	95969	051-164-060-000		MR	MF	0	30	8.75	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	16	43	168	227	Previous use (pre-fire) was COMMERCIAL	
PARADISE	6137 LUCKY JOHN RD	95969	052-012-052-000		MR	MF	0	30	1.9	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	3	6	24	33	Previous use (pre-fire) was SINGLE FAMILY RESIDENCE	
PARADISE	6189 CENTER ST	95969	052-040-085-000		MR	MF	0	30	1.71	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	3	5	21	29	Previous use (pre-fire) was SINGLE FAMILY RESIDENCE	
PARADISE	6184 CENTER ST	95969	052-060-027-000		MR	MF	0	30	0.57	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	1	2	10	13	Previous use (pre-fire) was COMMERCIAL	
PARADISE	9141 SKYWAY	95969	050-011-013-000		MR	MF	0	30	3.79	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	7	12	48	67		
PARADISE	WILLIAMS AND CENTRAL PAR	95969	053-080-006-000		MR	MF	0	30	1.89	Vacant	YES - Planned	NO - Privately-Owned	Available	Used in Prior Housing Element - Vacant	3	6	24	33		
PARADISE	WILLIAMS AND CENTRAL PAR	95969	053-080-005-000		MR	MF	0	30	1.84	Vacant	YES - Planned	NO - Privately-Owned	Available	Used in Prior Housing Element - Vacant	3	6	23	32		
PARADISE	WILLIAMS AND CENTRAL PAR	95969	053-080-003-000		MR	MF	0	30	1.32	Vacant	YES - Planned	NO - Privately-Owned	Available	Used in Prior Housing Element - NonVacant	2	4	16	22		
PARADISE	WILLIAMS AND CENTRAL PAR	95969	053-080-002-000		MR	MF	0	30	1.84	Vacant	YES - Planned	NO - Privately-Owned	Available	Used in Prior Housing Element - NonVacant	3	6	23	32		
PARADISE	ALMOND ST AND ELLIOT RD	95969	052-150-054-000		MR	MF	0	30	1.12	Vacant	YES - Planned	NO - Privately-Owned	Available	Used in Prior Housing Element - NonVacant	2	3	14	19		
PARADISE	CLARK RD AND BUSCHMANN	95969	054-060-103-000		MR	MF	0	30	4.41	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	8	14	56	78		
PARADISE	CLARK RD AND BUSCHMANN	95969	054-060-102-000		MR	MF	0	30	2.13	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	4	7	27	38		
PARADISE	5600 CLARK	95969	054-060-101-000		MR	MF	0	30	4.93	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	9	16	63	88		
PARADISE	Near intersection of Clark Rd.	95969	054-080-005-000		MR	MF	0	30	4.77	Vacant	YES - Planned	NO - Privately-Owned	Available	Used in Prior Housing Element - NonVacant	9	15	61	85		
PARADISE	SKYWAY AND ARLENE WAY	95969	051-132-038-000		TR	TR 1/2	0	2	1	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0		2	2		Maximum density of 2 is per site (not per acre)
PARADISE	Burdaparadise Ln and Skyway	95969	050-070-060-000		MR	MF	0	30	0.41	Vacant	YES - Planned	NO - Privately-Owned	Available	Used in Prior Housing Element - Vacant	0	3	3	6		
PARADISE	6674 PENTZ RD	95969	050-230-058-000		TR	TR 1/3	0	2	4.82	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	Previous use (pre-fire) was COMMERCIAL	Maximum density of 2 is per site (not per acre)
PARADISE	KILCREASE CIR	95969	050-150-111-000		TR	TR 1/3	0	2	25.42	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	Previous use (pre-fire) was COMMERCIAL	Maximum density of 2 is per site (not per acre)
PARADISE	6656 PENTZ RD	95969	050-240-078-000		TR	TR 1/3	0	2	3.16	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	Previous use (pre-fire) was COMMERCIAL	Maximum density of 2 is per site (not per acre)
PARADISE	6280 PENTZ RD	95969	053-250-115-000		TR	TR 1/3	0	2	4.17	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	Previous use (pre-fire) was COMMERCIAL	Maximum density of 2 is per site (not per acre)
PARADISE	1348 ELLIOT RD	95969	053-330-070-000		TR	TR 1/2	0	2	3.79	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	Previous use (pre-fire) was COMMERCIAL	Maximum density of 2 is per site (not per acre)
PARADISE	7075 CLARK RD	95969	050-051-052-000	B	MR	MF	0	15	1	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	9	9	Previous use (pre-fire) was COMMERCIAL	
PARADISE	7075 CLARK RD	95969	050-051-048-000	B	MR	MF	0	15	6.13	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	55	55	Previous use (pre-fire) was COMMERCIAL	
PARADISE	1080 PEARSON RD	95969	054-151-060-000		MR	MF	0	15	2.97	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	26	26	Previous use (pre-fire) was COMMERCIAL	
PARADISE	7075 CLARK RD	95969	050-051-049-000		MR	MF	0	15	2.23	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	20	20	Previous use (pre-fire) was COMMERCIAL	
PARADISE	6799 SKYWAY	95969	052-060-036-000		MR	MF	0	15	0.48	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	4	4	Previous use (pre-fire) was COMMERCIAL	

## APPENDIX D: SITES INVENTORY, Scenario Without the Sewer

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Optional Information1	Optional Information2
PARADISE	8634 SKYWAY	95969	051-102-047-000		TR	TR 1/3	0	1	2.29	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	1	2	This entry includes the realistic capacity for the entirety of Consolidated Site A, which is an approximately 10-acre that was listed for sale: <a href="https://www.estately.com/listings/info/3600-connie-circle">https://www.estately.com/listings/info/3600-connie-circle</a>	Maximum density of 2 is per site. Density convention has been back-engineered for this site to provide a density per acre metric in Column I, consistent with HCD conventions.
PARADISE	3631 CONNIE CIR APT A	95969	051-440-001-000	A	MR	MF	0	15	9.8	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	8	16	62	86	2 Previous use (pre-fire) was COMMERCIAL	
PARADISE	3631 CONNIE CIR APT B	95969	051-440-002-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3631 CONNIE CIR APT C	95969	051-440-003-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3631 CONNIE CIR APT D	95969	051-440-004-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3619 CONNIE CIR APT A	95969	051-440-005-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3619 CONNIE CIR APT B	95969	051-440-006-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3619 CONNIE CIR APT C	95969	051-440-007-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3619 CONNIE CIR APT D	95969	051-440-008-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3605 CONNIE CIR APT A	95969	051-440-009-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3605 CONNIE CIR APT B	95969	051-440-010-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3605 CONNIE CIR APT C	95969	051-440-011-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3605 CONNIE CIR APT D	95969	051-440-012-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3593 CONNIE CIR APT A	95969	051-440-013-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3593 CONNIE CIR APT B	95969	051-440-014-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3593 CONNIE CIR APT C	95969	051-440-015-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3593 CONNIE CIR APT D	95969	051-440-016-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3606 CONNIE CIR APT A	95969	051-440-017-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3606 CONNIE CIR APT B	95969	051-440-018-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3606 CONNIE CIR APT C	95969	051-440-019-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3606 CONNIE CIR APT D	95969	051-440-020-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3622 CONNIE CIR APT A	95969	051-440-021-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3622 CONNIE CIR APT B	95969	051-440-022-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3622 CONNIE CIR APT C	95969	051-440-023-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3622 CONNIE CIR APT D	95969	051-440-024-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3549 CONNIE CIR APT A	95969	051-440-025-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3549 CONNIE CIR APT B	95969	051-440-026-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3549 CONNIE CIR APT C	95969	051-440-027-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3549 CONNIE CIR APT D	95969	051-440-028-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3559 CONNIE CIR APT A	95969	051-440-029-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3559 CONNIE CIR APT B	95969	051-440-030-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3559 CONNIE CIR APT C	95969	051-440-031-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3559 CONNIE CIR APT D	95969	051-440-032-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3569 CONNIE CIR APT A	95969	051-440-033-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3569 CONNIE CIR APT B	95969	051-440-034-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3569 CONNIE CIR APT C	95969	051-440-035-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3569 CONNIE CIR APT D	95969	051-440-036-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3581 CONNIE CIR APT A	95969	051-440-037-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3581 CONNIE CIR APT B	95969	051-440-038-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3581 CONNIE CIR APT C	95969	051-440-039-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	3581 CONNIE CIR APT D	95969	051-440-040-000	A	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	5848 BLACK OLIVE DR	95969	052-106-016-000		MR	MF	0	15	0.27	Vacant	YES - Planned	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	0	2	This parcel is excluded in the inventory count given it is a condo parcel.	
PARADISE	5995 MAXWELL DR	95969	053-030-020-000		MR	MF	0	15	0.44	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	1	2	This entry includes the realistic capacity for the entirety of Consolidated Site E, which was the 6.5-acre Central Park Condominiums and was listed for sale 57 ( <a href="https://www.landandfarm.com/property/6_52_Acres_in_Butte_County-10254839/">https://www.landandfarm.com/property/6_52_Acres_in_Butte_County-10254839/</a> )	
PARADISE	5975 MAXWELL DR APT 1	95969	053-380-001-000	E	MR	MF	0	15	6.50	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	6	10	41	57	This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 2	95969	053-380-002-000	E	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 3	95969	053-380-003-000	E	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 4	95969	053-380-004-000	E	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 5	95969	053-380-005-000	E	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 6	95969	053-380-006-000	E	MR	MF	0	15	0.00	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 7	95969	053-380-007-000	E	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 8	95969	053-380-008-000	E	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 9	95969	053-380-009-000	E	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 10	95969	053-380-010-000	E	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 11	95969	053-380-011-000	E	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 12	95969	053-380-012-000	E	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 13	95969	053-380-013-000	E	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 14	95969	053-380-014-000	E	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 15	95969	053-380-015-000	E	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 16	95969	053-380-016-000	E	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 17	95969	053-380-017-000	E	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 18	95969	053-380-018-000	E	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 19	95969	053-380-019-000	E	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 20	95969	053-380-020-000	E	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 21	95969	053-380-021-000	E	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 22	95969	053-380-022-000	E	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	This parcel is excluded in the count given it is a condo parcel.	
PARADISE	5975 MAXWELL DR APT 23	95969	053-380-023-000	E	MR	MF	0	15	0	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0</					



PARADISE	WILLIAMS AND CENTRAL PARK DRIVE	95969	053-080-006-000		MR	MF		0	15	1.89	Vacant	YES - Planned	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	3	12	15		
PARADISE	WILLIAMS AND CENTRAL PARK DRIVE	95969	053-080-005-000		MR	MF		0	15	1.84	Vacant	YES - Planned	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	3	11	14		
PARADISE	WILLIAMS AND CENTRAL PARK DRIVE	95969	053-080-003-000		MR	MF		0	15	1.32	Vacant	YES - Planned	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	2	8	10		
PARADISE	WILLIAMS AND CENTRAL PARK DRIVE	95969	053-080-002-000		MR	MF		0	15	1.84	Vacant	YES - Planned	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	3	11	14		
PARADISE	ALMOND ST AND ELLIOT RD	95969	052-150-054-000		MR	MF		0	15	1.12	Vacant	YES - Planned	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	1	7	8		
PARADISE	SKYWAY AND ARLENE WAY	95969	051-132-038-000		TR	TR 1/2		0	2	1.00	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	1		Maximum density of 2 is per site. Density convention has been back-engineered for this site to provide a density per acre metric in Column I, consistent with HCD conventions.	
PARADISE	BURDAPARADISE LN AND SKYWAY	95969	050-070-060-000		MR	MF		0	15	0.41	Vacant	YES - Planned	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	1	1	2		
PARADISE	6674 PENTZ RD	95969	050-230-058-000		TR	TR 1/3		0	0.4	4.82	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	1	2	Previous use (pre-fire) was COMMERCIAL	Maximum density of 2 is per site. Density convention has been
PARADISE	KILCREASE CIR	95969	050-150-111-000		TR	TR 1/3		0	0.08	25.42	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	1	2	Previous use (pre-fire) was COMMERCIAL	Maximum density of 2 is per site. Density convention has been
PARADISE	6656 PENTZ RD	95969	050-240-078-000		TR	TR 1/3		0	0.6	3.16	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	1	2	Previous use (pre-fire) was COMMERCIAL	Maximum density of 2 is per site. Density convention has been
PARADISE	6280 PENTZ RD	95969	053-250-115-000		TR	TR 1/3		0	0.5	4.17	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	1	2	Previous use (pre-fire) was COMMERCIAL	Maximum density of 2 is per site. Density convention has been
PARADISE	1348 ELLIOT RD	95969	053-330-070-000		TR	TR 1/2		0	0.5	3.79	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	1	2	Previous use (pre-fire) was COMMERCIAL	Maximum density of 2 is per site. Density convention has been
PARADISE	7075 CLARK RD	95969	050-051-052-000	B	MR	MF		0	15	1.00	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	6	7	Previous use (pre-fire) was COMMERCIAL	
PARADISE	7075 CLARK RD	95969	050-051-048-000	B	MR	MF		0	15	6.13	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	5	10	39	54	Previous use (pre-fire) was COMMERCIAL	
PARADISE	1080 PEARSON RD	95969	054-151-060-000		MR	MF		0	15	2.97	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	2	4	19	25	Previous use (pre-fire) was COMMERCIAL	
PARADISE	7075 CLARK RD	95969	050-051-049-000		MR	MF		0	15	2.23	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	2	3	14	19	Previous use (pre-fire) was COMMERCIAL	
PARADISE	6799 SKYWAY	95969	052-060-036-000		MR	MF		0	15	0.48	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	2	2	4	Previous use (pre-fire) was COMMERCIAL	
PARADISE	9141 SKYWAY	95969	050-011-013-000		MR	MF		0	15	3.79	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	7	12	48	67		
PARADISE	CLARK RD AND BUSCHMANN RD	95969	054-060-103-000		MR	MF		0	15	4.41	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	8	14	56	78		
PARADISE	CLARK RD AND BUSCHMANN RD	95969	054-060-102-000		MR	MF		0	15	2.13	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	4	7	27	38		
PARADISE	SKYWAY AND ARLENE WAY	95969	054-060-101-000		MR	MF		0	15	4.93	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	9	16	63	88		
PARADISE	NEAR INTERSECTION OF CLARK RD AND BUSCHMANN RD	95969	054-080-005-000		MR	MF		0	15	4.77	Vacant	YES - Planned	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	9	15	61	85		
PARADISE	6186 CENTER ST	95969	052-040-084-000		MR	MF		0	15	2.29	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	2	3	14	19		
PARADISE	7722 WILLOW ST	95969	052-160-004-000		MR	MF		0	15	0.21	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	1	2	Previous use (pre-fire) was SINGLE FAMILY RESIDENCE	
PARADISE	6075 MAXWELL DR	95969	053-030-036-000		MR	MF		0	15	0.20	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	1	2		
PARADISE	758 WILLOW ST	95969	052-160-002-000		MR	MF		0	15	0.21	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	1	2	Previous use (pre-fire) was SINGLE FAMILY RESIDENCE	
PARADISE	773 WILLOW ST	95969	052-160-010-000		MR	MF		0	15	0.19	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	1	2	Previous use (pre-fire) was SINGLE FAMILY RESIDENCE	
PARADISE	766 EDWARDS LN APT A	95969	052-040-092-000		MR	MF		0	15	3.40	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	2	5	22	29		
PARADISE	5826 BLACK OLIVE DR	95969	052-143-006-000		MR	MF		0	15	0.20	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	1	2	Previous use (pre-fire) was SINGLE FAMILY RESIDENCE	
PARADISE	5754 BLACK OLIVE DR	95969	052-143-002-000		MR	MF		0	15	0.21	Vacant	YES - Planned	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	1	1	2		
PARADISE	7726 SKYWAY	95969	051-164-060-000		MR	MF		0	15	8.75	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	8	16	65	89	Previous use (pre-fire) was COMMERCIAL	
PARADISE	931 ELLIOTT RD	95969	053-111-034-000		CS	CS		0	15	4.35	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	4	7	27	38	former church site with no plans to rebuild	Will be rezoned to MF (General Plan designation MR) as part of the Town's planning for the sewer project. This rezoning is not to accommodate a shortfall of sites and instead is related to the Town's General Plan update. The rezoning is therefore not included on Table B.
PARADISE	8764 SKYWAY	95969	050-070-082-000		MR	MF		0	15	3.12	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	8	15	59	82	Previous use (pre-fire) was COMMERCIAL	
PARADISE	5500 CLARK RD	95969	054-080-038-000		MR	MF		0	15	6.18	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	4	10	39	53	Previous use (pre-fire) was COMMERCIAL	
PARADISE	759 WILLOW ST	95969	052-160-013-000		MR	MF		0	15	2.45	Vacant	YES - Planned	NO - Privately-Owned	Available	Used in Prior Housing Element - NonVacant	2	4	15	21	Previous use (pre-fire) was SINGLE FAMILY RESIDENCE	
PARADISE	5838 BLACK OLIVE DR	95969	052-160-015-000		MR	MF		0	15	3.35	Vacant	YES - Planned	NO - Privately-Owned	Available	Used in Prior Housing Element - NonVacant	2	5	21	28	Previous use (pre-fire) was COMMERCIAL	
PARADISE	6799 SKYWAY	95969	052-060-013-000		MR	MF		0	15	3.50	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	2	5	22	29	Previous use (pre-fire) was COMMERCIAL	

# APPENDIX E: PUBLIC ENGAGEMENT INPUT



## STAKEHOLDER INTERVIEWS

Interviews were conducted with eight stakeholders to better understand constraints, housing needs, and housing opportunities.

The main constraints and opportunities identified during these interviews are listed below.

### CONSTRAINTS

1. **Septic system capacity** is the main limiting factor for MF development. Increasing densities will likely not be possible until sewer goes in.
  - Developers viewed the proposed sewer project as uncertain, both in terms of its anticipated timing and how it will be funded. They also seemed to think that only a small portion of residential parcels would be able to utilize it.
  - Developing a MF project on a sewer parcel would add to the project's total development costs. How should we estimate these costs?
  - Generally, developers didn't seem to want to target densities beyond 15 du/acre, even when asked about the sewer project. This might be because of the uncertain timing of the project, or because they anticipate the sewer project only affecting certain sites in the Town.
  - The Town has determined that many properties have a failing septic system (40-60% of all properties). Replacing the septic is expensive. The Town and Rebuild Paradise Foundation have grants to support existing homeowners with these costs, but nothing for multi-family developers.
2. **Site availability.**
  - There aren't large parcels available for single-family home subdivisions in Paradise, so developers are taking a scattered site approach – which can be less cost effective and take more time.
  - There are also limited parcels zoned for multi-family housing in Paradise. This issue also intersects with the sewer project boundary question – see above.
3. **Insurance** in wildfire zones.

While insurance payouts have allowed both SF and MF property owners to rebuild, obtaining insurance for new construction has been very challenging – especially for multi-family housing (e.g., CHIP). Even when properties are able to get insurance, rates are at least 2x what they used to be. State legislation protects existing homeowners to some extent by requiring insurers to provide coverage, but there is no protection for multi-family/commercial properties of over \$3m in value.

4. Market-related barriers, including high **construction costs** for both SF and MF development.
  - Primarily due to shortage of labor and materials.
  - For individual homeowners, accessing construction loans can be a barrier.
  - The market is "dampened", low risk tolerance from development community.

## APPENDIX E

5. **Lack of amenities**, facilities (health care, schools) and infrastructure (roads, fiberoptic, etc.) makes it challenging to attract residents and development, but the lack of population makes it harder to attract businesses back. “Chicken and egg” problem. Affordable housing funding sources also score Paradise lower because of the lack of amenities/facilities.
6. **Local resistance to higher MF densities**. The community prefers open space and very low densities. Developers talked about the need for a culture shift. Need to figure out “appropriate” densities in the right locations, such as commercial corridors, while also respecting the existing character.
7. **Special housing needs**.

The large population of Paradise residents and ex-residents with disabilities are on a fixed income and can’t pay more than \$400/month on rent. Can’t find these rates for brand new housing that just got built. Some service providers used insurance money to buy replacement housing instead of rebuilding. Housing would need ADA compliance and to be close to the resources the town has to offer (e.g., transit, medical facilities, local events) to best serve those with disabilities. California Vocations has three sites in Paradise that are now vacant and could be potential sites for rebuilds, but need to find funding.

Specific to affordable housing development, the following barriers were cited.

- Very limited recent affordable housing development. Paradise Community Village is the only recent tax credit project. Recently rebuilt by CHIP after the fire.
- Disaster recovery tax credits:
  - Town of Paradise may struggle to secure credits if TCAC reinstates the readiness requirements (minimum zoning & access to basic amenities). The Town is still recovering, so meeting the TCAC scores related to access to amenities will be particularly challenging.
- Butte County AMLs:
  - Market rates rents are sometimes equivalent to low-income rents (80% AMI).
  - Subsidized affordable housing projects target very low or extremely low incomes.
- Potential for on-site below market rate (BMR) units is low, given current market rate rents.
- Few developers had heard of the state density bonus. Again, sewer capacity constrains density on most sites.

## OPPORTUNITIES

- Residential floorplan library has been helpful.
- Some developers see an opportunity to “build back better” and implement key community infrastructure early on (walking/biking, etc.).
- Developers mentioned new building technologies as potential solutions, but it isn’t clear yet that they will provide significant cost savings.

- On the question of ADUs, some developers stated that there was potentially some interest, but generally not as popular as in other places. Certain challenges include meeting the septic system and the Town's dwelling size requirements.
- Fire science woven into zoning would be helpful; give the Town more enforcement capabilities for mitigation measures; want the Town to have ability to enforce/abate properties that are creating fire safety hazards.
- Provide more opportunities for parks/green buffers – areas to be zoned residential and park at the same time if identified as a key piece of risk mitigation area; allow nonprofit buy it and turn it into greenbelt.

### INCORPORATION INTO HOUSING ELEMENT

Feedback from stakeholder interviews was used to inform the Constraints section of the Housing Element, and policies and programs are proposed to directly address the barriers that were identified, as summarized below.

- The Sewer Service Overlay is proposed to address density constraints and provide flexibility while the Paradise Sewer Project progresses.
- Site consolidation programs (HI-7) are proposed to address site availability.
- Coordination and partnerships with local insurance companies and Fire Safe Councils are proposed to address challenges related to insurance (HP-27, HI-14).
- In addition to incoming subsidy provided by CDBG-DR funds, challenges related to high construction costs could be alleviated through innovative construction methods and new types of housing like tiny homes (HP-12 and HP-13).

### PUBLIC MEETING COMMENTS

The public meeting on September 21, 2021 utilized breakout rooms and a live poll to gather community feedback.

#### BREAKOUT OUT ROOMS

Breakout rooms were utilized at the September 21, 2021 community meeting to discuss potential housing policies and programs. Participants answered six questions and the feedback received during these discussion groups is listed below.

**What do you think about increasing the allowed density of housing along Skyway and Clark for when the sewer system comes in? Would you support three-story buildings on these key corridors? Do you have concerns about this approach?**

- 3 stories is very large for the region, even in Chico. Too dense.
- There are dorms that are that large, has no problem with it as long as there is architectural control and they look nice.
- Some of the existing 3 story buildings are not aesthetically pleasing.

- All the houses are too close together, the density does not match the feel of Paradise.
- Would prefer to keep it at 2 stories.
- Some of the ones on Elliot are 2 stories and are nicely landscaped.
- If there was space for landscaping it does look better.
- No utilitarian/military block look.
- With all the open space requirements for fire resiliency, we need to add density elsewhere.
- We could put the open space within the buildings.
- Support higher density in moderation if it maintains neighborhood character.
- Like the idea of mixed uses for higher density buildings – also promotes walkability and safety to have mixed use.
- Preference for one story.
- Concern for traffic with increasing density along Skyway.
- Wary of aesthetic of massing with larger buildings.

**How do you see the wildfire shaping future housing and safety goals? Which wildfire resiliency policies do you support? Do any give you concern?**

Policy	Reasons for Support	Reasons for Concern	Incorporation into Housing Element
Parks and greenbelts as buffers	<ul style="list-style-type: none"> <li>▪ Very needed and desired</li> <li>▪ Would like to see the river edge be purchased by the state or county to maintain it as a buffer and protect against fires coming from the canyon</li> <li>▪ Can't rebuild the old footprint of the town, some lots are too narrow or have other issues. So we have to erase parts of Town, which is difficult due to personal connections</li> </ul>	<ul style="list-style-type: none"> <li>▪ Management</li> <li>▪ Concern for increasing setbacks</li> </ul>	Planning for Wildfire Risk Reduction Buffers is included in HP-26. Implementation of this policy includes continued outreach around it.
Wildfire hazard impact fee	<ul style="list-style-type: none"> <li>▪ Support for fire safe materials</li> </ul>	<p>What does that look like? Depends on how much.</p> <ul style="list-style-type: none"> <li>▪ Slight reservation, there are already a lot of fees associated with building</li> <li>▪ Would hate it to prevent someone from building on the land</li> </ul>	HP-25 calls for the Town to consider the feasibility of a fee.
Increased bldg/ landscape reqs.	<ul style="list-style-type: none"> <li>▪ Very supportive, realistic about energy and forces needed for maintenance effort</li> <li>▪ support for programs to increase enforcement of vegetation management</li> </ul>	What about homes that are already being rebuilt/been rebuilt?	HP-23 and numerous policies in the Safety Element would increase education around fire-safe practices. The Town would also monitor and consider the application of more stringent fire-safe requirements. Grants or no-interest loans would be considered
Home hardening or fuel mgmt programs	<ul style="list-style-type: none"> <li>▪ Interest in more resources for this</li> <li>▪ Enthusiasm for this</li> <li>▪ It would be good to help homeowners with this, especially for disabled people or someone without a lot of income</li> </ul>		

Policy	Reasons for Support	Reasons for Concern	Incorporation into Housing Element
Other: Insurance reform and community-based insurance	There has been increase in homeowner's insurance for some, others not so much. Some have had trouble finding insurance at all and was not able to switch providers. There is hope that we can reduce the risk factor and lower prices with these policies. RCAC looking into which combination of policies would satisfy the insurance companies that the town is enough safer to act normal again. Residents report there are noticeably fewer trees and more space, so the town is already a lot safer than 3 years ago, and this should be modelled for the insurance companies.		to help low-income property owners with vegetation management and home hardening. Coordination and partnerships with local insurance companies and Fire Safe Councils are proposed to address challenges related to insurance (HP-27, HI-14).

### What do you see as best practices for managing and maintaining adequate defensible space?

- Fire Dept is issuing citations or warnings, The Town is letting folks know if they meet the requirements. Important to go lot by lot and make sure every owner is doing what they have to do to maintain all of our defense. We have to do it as a group.
- But this is also difficult for some owners, especially some who aren't physically in Town. It takes too long for some people to do their tasks.
- Maybe what we need is faster acting laws on our books that allows the Town to act faster than in one year, which is inadequate. The whole process just takes too long.
- Need year-round reminders and enforcement of vegetation and weed management.
- Education for what to plant and what not to plant.
- Fence materials?
- Cutting weeds requires a lot of manual labor.
- Enforcement or safety around using herbicide.
- Mulching is costly and laborious.

### What can the Town do to support residents in extreme weather events related to heat and drought?

- There aren't as many extremes in Paradise as other areas, no need for this.
- Community centers to use power, making facilities available for AC. A lot of people in RVs.
- Identify and establish cooling centers; especially for those living in temporary housing (RV's and trailers, mobile homes).
- School district, other public facilities, churches to serve as cooling centers.



- Implement transportation contact network→ volunteers.
- County already has network for those with disabilities.
- Understanding resiliency plan for flooding, increased chance in burn scarred areas.
- Important to re-imagine what the vegetation can look like; Black Oak as opposed to Pine trees.
- Encourage tree planting programs→ County Resource Conservation District (RCD).
- Education program for resilient landscaping and understanding what fire safe materials mean and look like.

### **What other ideas, policies, program, or suggestions do you have to meet our housing needs?**

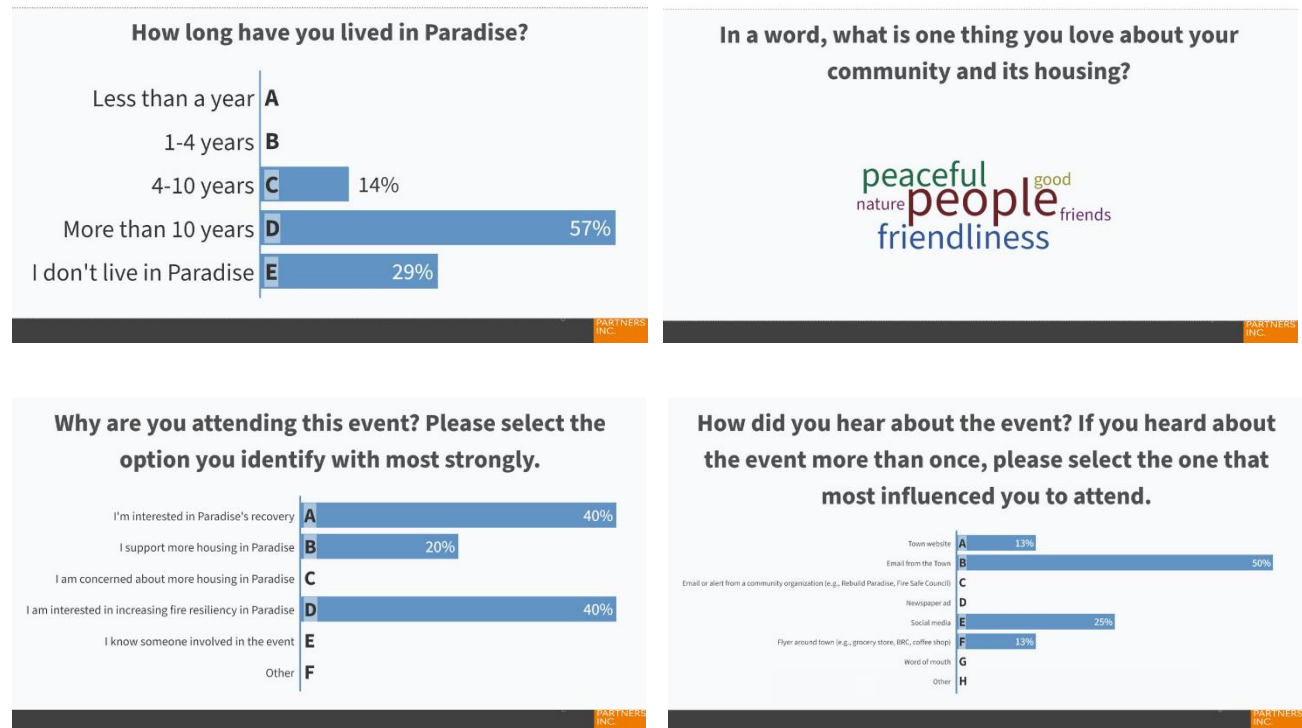
- Concern for mobile home parks from financing by developers/owners of parks to rebuild, while holding on to land for PG&E settlement.
- Mobile homes offer housing but ARE large fire risk.
- Volunteer housing for rebuilding homes.
- Provide greater flexibility for workforce and temporary housing.
- Ensure there's adequate sprinklers and up to fire code.

### **How do you feel about policies to facilitate unconventional building methods, typologies, or labor forces to get around high construction costs? Do you have ideas for partnerships or programs? Do you have other ideas to address high construction costs?**

- Housing for Volunteers.
- Storage container homes serve as effective alternative materials and are fire safe, not always done in an aesthetically pleasing way—design standards for alternative housing?
- Support for more uniform development that maintains character, want new construction being rebuilt to be long-lasting.
- Grouping of tiny homes into villages.
- Fire-safe constructed, affordable alternative modular units that ship cheaply (Boxabl).
- Interest in tiny home villages/concentration of affordable units.

## LIVE POLL

In addition to the breakout rooms, a live poll was used to collect data. The results are shown below.

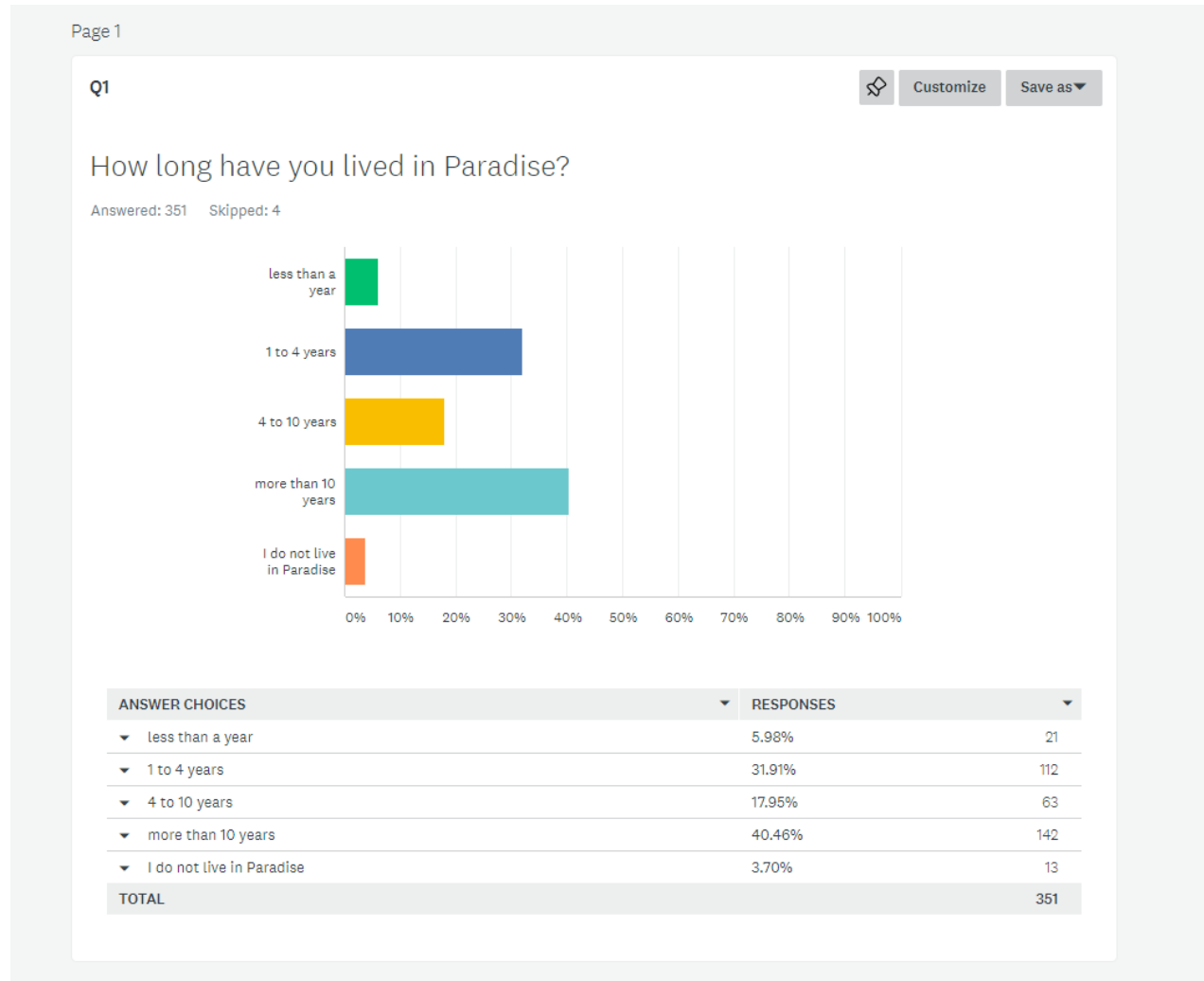


## INCORPORATION INTO HOUSING ELEMENT

Feedback from breakout rooms and live poll shaped the policies and programs included in the Housing and Safety Elements. Programs with the most support were included in the elements, including allowing tiny home villages, enforcing and helping property owners with vegetation management, working with community partners to try to tie insurance rates to home hardening and other fire-safe practices, pursuing the creation of Wildfire Risk Reduction Buffers, and concentrating more housing along key evacuation corridors that will be served by the future sewer system.

## ONLINE SURVEY

An online survey was open from September 22, 2021 to September 29, 2021 and 355 responses were collected. The results are shown below.



Q2

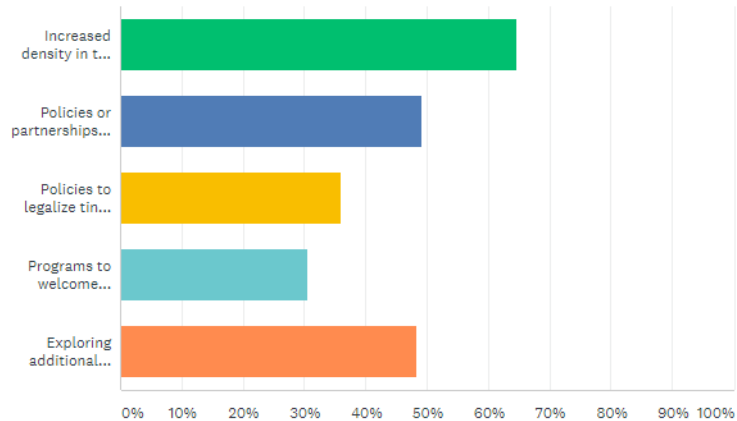


Customize

Save as ▼

Of the housing solutions listed below, which do you support? Select all that apply.

Answered: 350 Skipped: 5



## ANSWER CHOICES ▼

## RESPONSES ▼

▼ Increased density in the Sewer Service Area to build more housing near services and away from greatest risk	64.57%	226
▼ Policies or partnerships to facilitate nontraditional building methods like container architecture or off-site construction	49.14%	172
▼ Policies to legalize tiny homes and tiny home villages	36.00%	126
▼ Programs to welcome nontraditional labor forces to help rebuild	30.57%	107
▼ Exploring additional funding or partnership opportunities for affordable and supportive housing	48.29%	169

Total Respondents: 350



## INCORPORATION INTO HOUSING ELEMENT

Feedback from the online survey shaped the policies and programs included in the Housing and Safety Elements. Programs with the most support were included in the elements, including the densification of the town in the Sewer Service Area, establishment of potential Wildfire Risk Reduction Buffers, and pursuing potential partnerships with stakeholders working in non-traditional construction. Based on community feedback, policies and programs to discourage development in the most dangerous areas and policies that would add additional costs to development (e.g., impact fees, additional fire resiliency measures) are tempered to ensure tradeoffs with development feasibility are considered. With implementation of the Housing and Safety Elements, the Town will balance the need for fire safety and the need for housing.