

Butte County
California Environmental Quality Act
Interim Transportation Threshold

Overview

On September 27, 2013, Governor Jerry Brown signed California Senate Bill 743 (SB 743) into law. The goal of this legislation to reform transportation impact analysis under the California Environmental Quality Act (CEQA). SB 743 modified the CEQA Guidelines to require vehicle miles travelled (VMT) as the primary metric of transportation impacts. Associated with this change are impact significance thresholds recommended by the state that are not fully sensitive to the land use context of Butte County. The CEQA Guidelines have traditionally allowed the significance of impacts to vary with the setting (15064) noting the differences between urban and rural areas. Absent this sensitivity in current state recommendations, this paper presents the evidence for alternative threshold options for unincorporated Butte County.

Prior to implementation of SB 743, lead agencies, used vehicle Level of Service (LOS) analysis to determine transportation-related environmental impacts under CEQA. LOS measures vehicular delay, or the additional driving time encountered by drivers during the most congested times of travel. SB 743 prohibits the use of LOS to measure impacts under CEQA and requires agencies to adopt alternative measures of such impacts. Local agencies may continue to use LOS analysis for other programs unrelated to CEQA.

In December 2018, the California state Office of Planning and Research (OPR) prepared the *Technical Advisory on Evaluating Impacts in CEQA* that includes VMT threshold recommendations that vary based on whether a project is located within a metropolitan planning organization (MPO). For projects within an MPO, OPR recommends the use of urban quantitative thresholds. In rural counties, OPR recognizes rural areas should be treated differently based on their land use and transportation context. However, the OPR recommendations fail to recognize that rural areas within MPO boundaries function identically to rural areas in parts of the state that are not covered by an MPO. This distinction is important because OPR recommends that rural areas outside of an MPO political boundary be treated differently when it comes to VMT thresholds, leaving the choice of threshold up to the lead agency.

Butte County

Butte County is agricultural and rural despite the MPO characterization that is based on population. Two thirds of County residents live in the cities of Chico, Paradise, and Oroville with all other residents distributed throughout the 1,676 square miles of the County.¹ This dichotomy between an urban core and rural County is important to understand because there are few quantifiable methods of reducing VMT that would apply to the rural unincorporated areas of Butte County.

The OPR *Technical Advisory on Evaluating Transportation Impacts in CEQA* relies on largely urban methods of reducing VMT contained in the 2010 California Air Pollution Control Officers Association (CAPCOA) report *Quantifying Greenhouse Gas Mitigation Measures*, and notes that reduction of VMT in rural areas may need to be evaluated on a “case-by-case basis”².

The CAPCOA document recommended measures that include increasing population density, encouraging housing near urban cores or employment, and an increase in transit accessibility. While several of the land use design measures may apply outside of the developed areas of Butte County, most of the VMT reduction measures do not apply in the rural areas of the County because of the distances involved between origins and destinations, lack of population density/concentration, and the need to protect the agricultural lands vital to the County.

Recognizing that there are incorporated cities and established communities in the County, this document provides a two-step screening that will apply to development proposals. Step 1 involves a screening process where qualifying projects will be relieved of having to perform VMT impact analysis because evidence supports a presumption the VMT impact being less than significant. For projects that do not qualify for screening, Step 2 will be required where the project will be evaluated against whether it would generate VMT per capita at a higher rate than the baseline average for the unincorporated County.

Approach

The BCAG Implementation Report discusses the following three options for establishing a threshold for VMT:³

1. **CEQA Guidelines.** Section 15064.3 can be interpreted as establishing a threshold where ‘any’ increase in VMT above baseline conditions would constitute a significant VMT impact. This threshold is recommended in the OPR Technical Advisory for retail land use projects. Caltrans also supports this threshold for roadway capacity projects stating, “Within MPO areas..., a project that results in an increase in VMT when comparing the future build alternative to the future no-build alternative (i.e., the VMT is higher under the future build scenario) will generally be considered significant...”
2. **OPR Technical Advisory.** The OPR Advisory contains VMT threshold recommendations that vary by type of project and type of land use as follows.
 - a. **Residential projects** – A proposed project exceeding a level of 15 percent below existing (baseline) VMT per capita may indicate a significant transportation impact. Existing VMT per capita may be measured as regional VMT per capita or as city VMT per capita.
 - b. **Office projects** – A proposed project exceeding a level of 15 percent below existing (baseline) regional VMT per employee may indicate a significant transportation impact.
3. **Non-Interference.** This option would focus on not interfering with the state’s ability to meet VMT/GHG reduction goals. This threshold recognizes that VMT reduction is tied to state GHG reduction goals and would allow the county to assess VMT impacts of projects based on whether they would interfere or prevent the state from taking actions necessary to reduce VMT consistent with state goals. The state has the authority to implement a wide variety of actions that could effectively reduce VMT such as higher gas taxes, a new VMT tax, new tolls, etc. Local projects that do not interfere with this authority could reflect that outcome as part of their VMT impact analysis using this threshold.

The recommended approach is a mix of the three options presented in the BCAG report. The County Climate Action Plan (CAP) demonstrates that the combination of land uses and actions by the County will meet the 2050 greenhouse gas emissions target.⁴ As the County is on track to meet the state GHG reduction goals by 2050, demonstrating compliance with the General Plan and the CAP is an essential start to review of any project. Further, the recommended approach recognizes that land use and transportation project decisions in Butte County do not interfere with the state's ability to achieve its desired VMT and GHG reduction goals given the authority of the state to take a wide variety of actions that would disincentive current levels of vehicle use.

As part of the screening process, projects would be evaluated for both proximity to incorporated areas or established communities and for including VMT measures of the adjacent agency in the project design. If a project is near an incorporated area or established community, then an effort must be made to ensure that the plans of the adjacent city, or the land use pattern of the established community, encourages connectivity and mobility options. If a project is outside of these areas, then compliance with the General Plan is required along with provisions for mixed land use and pedestrian access. If a project would change the general plan, then an evaluation of the VMT impacts is required as well as a determination that the project will not impede meeting the County year 2050 GHG per capita target as shown in the CAP.

Discussion

Because the County has both urban and rural areas, a single approach to VMT reduction is not possible. For areas within the spheres of influence (SOI) of incorporated cities and service areas, the screening methodology recognizes the potential land use efficiency benefits of those projects that are close to destinations and can access and/or provide multimodal access to those destinations.⁵ To qualify for this screening, some projects in the unincorporated County may be required to extend or provide facilities that connect the project site to the existing walking, bicycling, and transit network of the adjacent established community or city. These projects may also need to incorporate VMT reduction methods adopted by the adjacent city into the project design. For areas outside of an SOI, but within an established community, the design of new development will need to emphasize connectivity and proximity. Development outside of an SOI or town center should continue to be discouraged through General Plan policies and Board action. These have been the policies of the Board for over 20-years.

Butte County, at over 1,676 square miles, is larger than any city in California and has both very urban areas and very rural areas. Over 60 percent of the County is in farmlands that is essential to the agricultural industry that averages \$716-million per year.⁶ Recognizing the importance of agriculture, the County has a long tradition of directing development into incorporated cities, spheres of influence, and to communities where development has already occurred. (See General Plan Land Use Goal LU-8 and associated policies.) The results of this emphasis are visible on Figure 1 that shows population density countywide is concentrated near the incorporated cities and surrounding areas. Land Use Element Policy LU-P8.2 states that the County shall direct projected growth to areas where the appropriate level of transportation infrastructure is or will be available during the planning period, and Policy LU-P8.3 Applicants intending to develop sites served by existing public facilities shall be encouraged to develop at the highest allowable density and intensity.

Methodology for Establishing Threshold

In 2014 the California Air Resources Board (CARB) stated that “Achieving California’s long-term criteria pollutant and GHG emissions goals requires four strategies to be employed: (1) improve vehicle efficiency and develop zero emission technologies, (2) reduce the carbon content of fuels and provide market support to get these lower-carbon fuels into the marketplace, (3) plan and build communities to reduce vehicular GHG emissions and provide more transportation options, and (4) improve the efficiency and throughput of existing transportation systems.”⁷

The first two criteria are under the sole purview of the State of California with little potential for the County to influence. The state mandates vehicle efficiencies and negotiates directly with manufacturers. While the County can, and does, encourage recharging stations and flexibility fueling locations (CNG, Hydrogen) through its CAP and enforcement of the California Building Code (CBC), the structural change in vehicle efficiency is a state responsibility.

Similarly, since the early 1990s, CARB has regulated the composition of vehicle fuels sold in the state through the California Reformulated Gasoline Regulations. In September 2020, Governor approved Executive Order N-79-20, that states:

“It shall be a goal of the State that 100 percent of in-state sales of new passenger cars and trucks will be zero-emission by 2035. It shall be a further goal of the State that 100 percent of medium- and heavy-duty vehicles in the State be zero-emission by 2045 for all operations where feasible and by 2035 for drayage trucks. It shall be further a goal of the State to transition to 100 percent zero-emission off-road vehicles and equipment by 2035 where feasible.”

The order goes on to direct CARB to meet this same target for medium and heavy-duty vehicles as well as off road equipment to be zero emissions. This area of reduction is also clearly in the sole authority of the state.

The final two criteria are at least partially within the ability of the County to influence. The County, through Figure LU-2, influences where development occurs, as well as the density and intensity of each land use. Through long-standing policy direction, the General Plan emphasizes agriculture and forestry land uses by discouraging development in these rural areas. The general plan recognizes several historical town centers that are intended to provide services to workers who must live closer to their area of work. By necessity, these are distant from urban centers in Butte County.

The California Air Resources Board (CARB) in its 2018 progress report notes that “California cannot meet its climate goals without curbing growth in single-occupancy vehicle activity.” In other words, vehicle efficiency and better fuels are necessary, but insufficient, to address the GHG emissions from the transportation system. Land use patterns and transportation options also will need to change to support reductions in vehicle travel/VMT.

Development can occur in both rural and developed areas of the County and the potential to reduce VMT will vary depending on project location. If a project within an SOI or near an established community extends the existing transportation network, ensures connectivity and compatibility with multi-modal mobility plans of the affected agency, the project would be screened from requiring additional VMT analysis. For other areas of the county, projects that provide for pedestrian connectivity and a mix of

complementary land uses would be screened from requiring additional VMT analysis. As established communities are often situated on or near important agricultural or forestry land, these communities have already shortened trip lengths. Ensuring connectivity to other existing or planned service uses will further reduce the need for trips. Residents in remote areas of the County often make single large shopping trips rather than regular smaller trips as the distance to shopping and services encourages efficient travel. In unincorporated areas that are outside of the city and town influence areas, intense residential development should continue to be discouraged through existing land use and zoning policies that prohibit a reduction in parcel sizes.

Screening

Each project will be evaluated to determine if it can be screened from needing a separate VMT analysis. The determination will be made during the Pre-Application Review (PAR), or during consultation with the Planning Department prior to making application. Note that these screening determinations are not absolute, and the County may determine that a project specific VMT analysis must be prepared to support a project.

Based on the OPR Technical Advisory, and the discussion in this memorandum, the following projects are considered to have a de minimis effect on VMT and the County may determine that a project specific VMT Analysis is unnecessary:

De Minimis Development projects:

- **Any project that generates or attracts 110 or fewer trips per day.** Depending on project location, this may correspond to the following “approximate” development potentials:
 - 10-15 single family housing units
 - 16-20 multi-family, condominiums, or townhouse housing units
 - 10,000 sq. ft. of office
 - 15-20,000 sq. ft. of light industrial
 - 63,000 sq. ft. of warehousing
- **Projects statutorily or categorically exempt from CEQA.**
- Locally serving retail 50,000 square feet or less. Examples of local serving includes, but is not limited to schools, civic buildings, medical buildings, cleaners, offices, and other land uses intended to serve the local community and to improve the convenience of obtaining services locally.
- Projects within an adopted city sphere of influence (SOI) or within the planning area of an established community, that include the following:
 - The project is consistent with the General Plan, Specific or Community Plan and CAP.
 - Pedestrian connection (trails, sidewalks, cul-de-sac with pedestrian access to adjacent roadway) to existing or planned pedestrian systems.
 - Either include, or provide access to complementary land uses that would encourage residents to stay local for some of the local trips
 - Ensure that the design and construction of roadways connecting to the adjacent city/established community provide facilities for walking and bicycling (pursuant to the County wide Bike Plan), and where appropriate, transit stops consistent with Butte

Regional Transit specifications.

- Payment of impact fees as appropriate for improvements consistent with the adjacent city's program for VMT reduction where adopted by the City.

Transportation projects

The County often makes mobility system improvements independent of, or concurrent with, development projects. The following improvements are shown in the OPR Technical Advisory as not considered to increase VMT and would therefore not be required to complete a VMT analysis.

- Rehabilitation, maintenance, replacement, safety, and repair projects designed to improve the condition of existing transportation assets and that do not add additional motor vehicle capacity.
- Roadside safety devices or hardware installation such as median barriers and guardrails
- Addition of an auxiliary lane of less than one mile in length designed to improve roadway safety
- Installation, removal, or reconfiguration of traffic lanes that are not for through traffic, such as left, right, and U-turn pockets, two-way left turn lanes, or emergency breakdown lanes that are not used as through lanes.
- Addition of roadway capacity on local or collector streets provided the project also substantially improves conditions for pedestrians, cyclists, and, if applicable, transit
- Conversion of existing general-purpose lanes (including ramps) to managed lanes or transit lanes, or changing lane management in a manner that would not substantially increase vehicle travel
- Addition of a new lane that is permanently restricted to use only by transit vehicles
- Reduction in number of through lanes
- Grade separation to separate vehicles from rail, transit, pedestrians or bicycles, or to replace a lane in order to separate preferential vehicles (e.g., HOV, HOT, or trucks) from general vehicles
- Installation, removal, or reconfiguration of traffic control devices, including Transit Signal Priority (TSP) features
- Installation of traffic metering systems, detection systems, cameras, changeable message signs and other electronics designed to optimize vehicle, bicycle, or pedestrian flow
- Timing of signals to optimize vehicle, bicycle, or pedestrian flow
- Installation of roundabouts or traffic circles
- Installation or reconfiguration of traffic calming devices
- Initiation of new transit service
- Conversion of streets from one-way to two-way operation with no net increase in number of traffic lanes
- Removal or relocation of off-street or on-street parking spaces
- Adoption or modification of on-street parking or loading restrictions (including meters, time limits, accessible spaces, and preferential/reserved parking permit programs)
- Addition of traffic wayfinding signage

- Rehabilitation and maintenance projects that do not add motor vehicle capacity
- Addition of new or enhanced bike or pedestrian facilities on existing streets/highways or within existing public rights-of-way
- Addition of Class I bike paths, trails, multi-use paths, or other off-road facilities that serve non-motorized travel
- Installation of publicly available alternative fuel/charging infrastructure
- Addition of passing lanes, truck climbing lanes, or truck brake-check lanes in rural areas that do not increase overall vehicle capacity along the corridor.

Based on the unique characteristics of the County, the following projects are considered to have a de minimis effect on VMT and the County may determine that a project specific VMT Analysis is unnecessary:

- Addition of secondary access roads to serve existing development provided that the roadways are all at existing LOS C or better and are projected to remain at LOS C in the future condition.

It is an unfortunate truth that the County has been ravaged by natural disasters. The ability to evacuate areas ahead of wildfire or flood is essential. In some areas a single roadway in or out can hinder evacuation. For this screening threshold the addition of a secondary access to roadways that are both operating at or better than an LOS C, and projected to continue to operate at LOS C, would not result in an increase in VMT. As there is no existing congestion on the roadway, and no congestion is forecast, the addition of a road access only increases access and emergency ingress/egress options for the residents and responders. This is in line with the OPR bullet above that states “Addition of roadway capacity on local or collector streets provided the project also substantially improves conditions for pedestrians, cyclists, and, if applicable, transit.” In this context the additional capacity is in the form of access option in case of an emergency.

- Agricultural processing facilities proposed to improve travel efficiency for workers.

Large trucks are not usually considered in VMT calculations⁸. Therefore, placing the processing facilities nearer to workers and crops will reduce the amount of travel for the workers.

Threshold of Significance

The following thresholds of significance will be applied to all discretionary projects that are unable to be screened from VMT analysis or considered de minimis.

XVII. TRANSPORTATION. Would the project:

a) Would the project disrupt existing or planned transit service or facilities for walking or bicycling?

A project would cause a significant impact if it disrupts existing, or interferes with planned, facilities or services for walking, bicycling, or transit.

b) Would the project generate VMT per capita above the applicable baseline average for the unincorporated area of the County?

A project would cause a significant VMT impact if it generated VMT per capita above the unincorporated county baseline average. Baseline VMT estimates can be obtained from the latest version of the BCAG

RTP/SCS model (currently Modified Version 1.1 -3.17.21) or other VMT data sources , a mobile device data vendor that offers SB 743 compliant VMT estimates based on current year estimates. For residential land uses, home-based VMT per capita can be used while work-related land uses can use home-based work VMT per employee.

c) Would the project modify the transportation network that would create an inconsistency with applicable development or design standards?

A project would cause a significant transportation safety impact if it causes a physical change to the transportation network or a change in traffic characteristics that are inconsistent or incompatible with the applicable development or design standards for the affected facility.

Regulatory Background

California Environmental Quality Act

The California Environmental Quality Act (CEQA) is intended to inform government decisionmakers and the public about the potential environmental effects of proposed activities and to prevent significant, avoidable environmental damage. The CEQA defines Thresholds of Significance as:

15064.7 (a)

- (a) A threshold of significance is an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant.

The environmental analysis relies on thresholds of significance to determine whether a projected impact is considered significant. The CEQA Guidelines state:

- (b) Each public agency is encouraged to develop and publish thresholds of significance that the agency uses in the determination of the significance of environmental effects. Thresholds of significance to be adopted for general use as part of the lead agency’s environmental review process must be adopted by ordinance, resolution, rule, or regulation, and developed through a public review process and be supported by substantial evidence. Lead agencies may also use thresholds on a case-by-case basis as provided in Section 15064(b)(2).

Nothing in the CEQA Guidelines states that adopting a threshold is subject to environmental review. This is further supported by the California Building Industry Association v. Bay Area Air Quality Management District (2015) 62 Cal.4th 369 court decision. Initially, the litigation concerned whether BAAQMD’s adoption of thresholds was a “project” subject to CEQA review. The trial court found that it was and issued a writ of mandate invalidating the thresholds for failure to comply with CEQA. The First District Court of Appeal reversed, finding that the thresholds were not subject to CEQA review for two reasons. First, the CEQA Guidelines establish the required procedure for enacting generally applicable thresholds of significance, and prior CEQA review is not part of that process. Second, the thresholds were not a “project” because the “environmental change” alleged by California Building Industry Association (CBIA) was speculative and not reasonably foreseeable. The Supreme Court did not grant review over this issue

and thus the Court of Appeal’s holding that the act of adopting thresholds is not a project under CEQA stands.

SB 743

On September 27, 2013, Governor Jerry Brown signed California Senate Bill 743 (SB 743) into law. The goal of this legislation was to transition transportation analyses under the California Environmental Quality Act (CEQA) from an emphasis on automobile delay to meeting the state’s goals of reducing greenhouse gas emissions and traffic-related air pollution, promoting the development of a multimodal transportation system, and providing clean, efficient access to destinations. The effect of this legislation was to remove a reduction in the LOS as a means of determining a significant environmental impact when conducting environmental analysis under CEQA. (PRC § 21099(b)(2))

OPR Guidelines

The California Office of Planning and Research (OPR) posted a Technical Advisory on Evaluating Transportation Impacts in CEQA in December 2018. (OPR, 2018) As stated on page 1 of the advisory,

“OPR is not enforcing or attempting to enforce any part of the recommendations contained herein. (Gov. Code, § 65035 [“It is not the intent of the Legislature to vest in the Office of Planning and Research any direct operating or regulatory powers over land use, public works, or other state, regional, or local projects or programs.”].”

Nevertheless, while OPR may not be enforcing the standards discussed in the advisory, the content and recommendations in the advisory are being used to develop standards, or as a stand-in for standards, when evaluating project generated VMT. Absent court decisions on this issue each agency is required to develop VMT thresholds to comply with CEQA.

CAPCOA VMT Reduction Methods

The OPR technical advisory includes recommended methods to reduce VMT that are a combination of project design, transit, and changes in project operations. In 2010, The California Air Pollution Control Officers Association (CAPCOA) published a list of potential mitigation measures along with quantifying methods for reducing VMT. (CAPCOA, 2010) An update to this document was published in August 2021 with a final version anticipated in December 2021.¹ It is important to note that the updated document reduced the number of VMT mitigation strategies that could be used to quantitatively measure VMT reduction from 50 to 30 with only 16 of the measures now applicable for project site application. In many cases, these project site measures would not apply in a rural setting such as unincorporated Butte County because of the low-density land use context and limited viability of transit, bicycling, or walking to complete trips.

General Plan

The Butte County General Plan 2030 was adopted in 2010 and amended in 2016. The General Plan includes numerous land use and transportation policies that require efficient landform and starts with the following guiding principles:

¹ <https://www.airquality.org/businesses/ceqa-land-use-planning/ghg-handbook-caleemod>

Cooperative Planning. Through the Butte County General Plan and the municipalities' General Plan update processes, the County will partner with municipalities, special districts and unincorporated communities on important regional planning issues. Furthermore, the County will collaborate with the military to ensure the land uses within military operating areas (MOAs) are compatible with the military mission.

Agriculture. The General Plan addresses agriculture as an important aspect of Butte County's economy that will be protected, maintained, promoted and enhanced.

Rural Development. The General Plan identifies appropriate locations and the type of growth that will occur in rural areas while protecting the integrated benefits of agricultural resources, natural resources and the environment.⁹

Climate Action Plan

The County updated the 2014 Climate Action Plan (CAP) in December 2021. Table 31 of the 2021 CAP shows that the County is on a path to achieve GHG reduction targets for 2030, 2040, and 2050 with the implementation of Butte Choice Energy (BCE). The CAP also notes that it is likely that there will be new technologies, policies and regulations, and personal and economic behaviors and preferences, and other factors that will emerge in future years and contribute to additional GHG emission reductions in a way that cannot be accurately forecasted in the 2021 CAP.¹⁰ The CAP is based on the RTP/SCS that is in turn based on the County General Plan. As a result, consistency with the General Plan is important to meeting the results projected in the CAP.

BCAG RTP/SCS

As the Metropolitan Planning Organization (MPO) for Butte County, the Butte County Association of Governments (BCAG) adopted the 2020 Regional Transportation Plan / Sustainable Communities Strategy for Butte County (RTP/SCS), which specifies policies, projects and programs necessary over a 20+ year period to maintain, manage and improve the region's transportation system. The 2020 RTP/SCS covers the 20-year period between 2020 and 2040. The RTP/SCS includes an Air Quality Conformity Analysis and Determination as well as a Supplemental Environmental Impact Report. The regional transportation plan (RTP) contains policies that support a safe and efficient roadway system that accommodates the demand for the movement of people and goods in the county.¹¹ The SCS complies with Senate Bill 375 Sustainable Communities and Climate Protection Act of 2008, by demonstrating the integration of land use, housing, and transportation to reduce passenger vehicle (cars & light trucks) greenhouse gas emissions (GHG). The intent of the SCS is to meet the GHG emission reduction targets set by the California Air Resources Board (CARB) for the years 2020 and 2035.

BCAG SB 743 Implementation

BCAG prepared an implementation guide for member agencies to understand questions that needed to be addressed when implementing the vehicle miles traveled thresholds. The document includes research, analysis, and other evidence to support their final SB 743 implementation decisions. BCAG chose to lead this effort to help reduce SB 743 implementation costs that would have otherwise been incurred by each member agency pursuing independent implementation efforts. BCAG provides this documentation as a resource for its member agencies and does not make any specific recommendations regarding SB 743

implementation. Each member agency will be required to make its own SB 743 implementation decisions and may rely on this information to the extent it is relevant.

¹ California Department of Finance (January 2021), E-5 Report.

² California Office of Planning and Research (December 2018), *Technical Advisory on Evaluating Transportation Impacts in CEQA*, p. 19.

³ *Ibid*, p. 40.

⁴ Butte County (December 2021), *Butte County 2021 Climate Action Plan*, p. 93.

⁵ Land Use Element Policy LU-P11.1 The County shall continue to collaborate on planning and building within the municipalities' spheres of influence in order to establish consistent development standards, and LU-P11.4 Staff shall also refer all County General Plan amendments, Zoning Code amendments, and development projects within a municipality's General Plan Planning Area to that municipality for review and comment.

⁶ Butte County Agricultural Commission (October 2021) *Butte County 2020 Crop & Livestock Report*

⁷ California Air Resources Board (May 2014) *First Update to the Climate Change Scoping Plan*, p. 46.

⁸ California Office of Planning and Research (December 2018), *Technical Advisory on Evaluating Transportation Impacts in CEQA*, p. 4.

⁹ Butte County (November 2012), *Butte County General Plan 2030*, p. 2-1.

¹⁰ Butte County (December 2021), *Butte County 2021 Climate Action Plan*, p. 93.

¹¹ Butte County Association of Governments (December 2020) 2020 Regional Transportation Plan / Sustainable Communities Strategy for Butte County, p. ES-2