

January 17, 2024

Lindsay Leon, Project Planner
Elevated Entitlements
280 Thousand Oaks Blvd. #H
Thousand Oaks, California 91360

Subject: Tesla Supercharger, Yermo – VMT Screening Analysis

Dear Lindsay,

Translutions, Inc. (Translutions) is pleased to provide this letter discussing the VMT screening analysis for the proposed Tesla Supercharger to be located at 36017 Calico Road in the Yermo area of unincorporated San Bernardino County. The project proposes 40,670 square feet of retail uses and 492 Tesla charging stations.

VMT SCREENING ANALYSIS

Senate Bill (SB) 743 – On September 27, 2013, California Governor Jerry Brown signed SB 743 into law and started a process to fundamentally change transportation impact analysis conducted as part of California Environmental Quality Act (CEQA) compliance. The Governor's Office of Planning and Research (OPR) issued proposed updates to the CEQA guidelines in support of these goals in November 2017¹ and a supporting technical advisory in December 2018². The updates establish vehicle miles traveled (VMT) as the primary metric for evaluating a project's environmental impacts on the transportation system. The changes to CEQA guidelines Section 15064.3 to implement SB 743 were certified by the State in December of 2018. The County of San Bernardino adopted the *County of San Bernardino Traffic Impact Analysis Guidelines* in July 2019 which provides methodologies and screening thresholds to evaluate projects under VMT. The adopted *County of San Bernardino Traffic Impact Analysis Guidelines* also provides screening thresholds to screen projects out of project level assessments. The County provides three types of screening:

1. **Projects which serve the local community and have the potential to reduce VMT should not be required to complete a VMT assessment. These projects are noted below:**
 - K-12 schools
 - Local-serving retail less than 50,000 sq. ft.
 - Local parks
 - Day care centers
 - Local serving gas stations
 - Local serving banks
 - Student housing projects
 - Local serving community colleges that are consistent with the assumptions noted in the RTP/SCS

The proposed project includes less than 50,000 square feet of retail uses, which screens out the retail portion of the project from a VMT analysis. Further, the County exempts gas stations from VMT analysis and it is expected that electric vehicle charging stations, which reduce greenhouse gas emissions, will be exempt from a VMT assessment.

2. **Projects generating less than 110 daily vehicle trips¹. This generally corresponds to the following "typical" development potentials:**
 - 11 single family housing units

¹ This threshold ties directly to the OPR technical advisory and notes that CEQA provides a categorical exemption for existing facilities, including additions to existing structures of up to 10,000 square feet, so long as the project is in an area where public infrastructure is available to allow for maximum planned development and the project is not in an environmentally sensitive area. (CEQA Guidelines, § 15301, subd. (e)(2).) Typical project types for which trip generation increases relatively linearly with building footprint (i.e., general office building, single tenant office building, office park, and business park) generate or attract an additional 110-124 trips per 10,000 square feet. Therefore, absent substantial evidence otherwise, it is reasonable to conclude that the addition of 110 or fewer trips could be considered not to lead to a significant impact.

- 16 multi-family, condominiums, or townhouse housing units
- 10,000 sq. ft. of office
- 15,000 sq. ft. of light industrial
- 63,000 sq. ft. of warehousing
- 79,000 sq. ft. of high cube transload and short-term storage warehouse

The retail portion of the project, by itself, is expected to generate more than 110 daily trips. Therefore, this metric does not apply.

3. **Projects located within a Transit Priority Area (TPA) as determined by the most recent SCAG RTP/SCS (map of HQTAs can be reviewed on SCAG's website currently located here and will further be refined through SBCTA's efforts: <http://gisdata.scag.ca.gov/Pages/GISStaticMaps.aspx> but should be verified by the analyst.**

The project is not located within a TPA. Attachment B shows the results of the TPA Screening.

4. **Projects located within a low VMT generating area as determined by the analyst (e.g. development in efficient areas of the County will reduce VMT per person/employee and is beneficial to the region)**

The proposed project is not located within a low VMT area, and this threshold does not apply. Attachment B shows the results of the low VMT Area Screening.

Based on the above, the proposed project screens out of a VMT analysis.

We hope you will find the above information helpful.

Sincerely,

translutions, Inc.


Sandipan Bhattacharjee, P.E., T.E., AICP, ENV SP
Principal

Attachments:

- Attachment A – Site Plan
- Attachment B – VMT Screening Map

SBCTA VMT Screening Tool Powered by Fehr & Peers User's Guide

Yermo, CA, USA

Show search results for Yermo, CA, USA

Complete #1 - 4, Then Click 'Run'

Input Output

Project Area VMT
The result is drawn on the map.

Screening Results
The result is drawn on the map.

Low VMT Generating TAZs
The result is drawn on the map.

Screening Results (2 of 2)

Completely within a TPA? No (Fail)

Within a low VMT generating TAZ? No (Fail)

Note
Screening results are based on location of parcel centroids. If results are desired considering the full parcel, please refer to the associated map layers to visually review parcel and TAZ boundary relationship.

Zoom to

ATTACHMENT B

Yermo Tesla Supercharger VMT Screening Map