

Appendix TR-1

Vehicle Miles Traveled Memorandum

To: Cameron Shew
Principal Civil Engineer, Planning and Programs Division
Sacramento County Department of Transportation

From: Chris Gregerson, P.E., T.E., PTOE, PTP
Tyler Mickelson, EIT

Re: **WattEV EIR**
Vehicle Miles Traveled (VMT) Analysis

Date: September 6, 2023

In accordance with Task 5.7 of our Scope of Services, we are writing to summarize the Vehicle Miles Traveled (VMT) analysis completed for the proposed WattEV truck charging station and solar development (the “Project” or “proposed Project”) in Sacramento County, CA. This memorandum summarizes the VMT analysis and resultant findings for the proposed Project.

Project Description

Kimley-Horn understands that the Project includes the development of a solar facility and electric vehicle (EV) truck stop along Bayou Way near Interstate 5 and Powerline Road in Sacramento County, California, on property owned by Sacramento International Airport (SMF). The proposed Project will consist of an approximately 100-acre solar field and a 10-acre truck stop charging plaza and store. The project site consists of three parcels (APN: 225-001-000-3, -5, -6) located in Sacramento County, California. The Project location is shown in **Exhibit 1**. The Project is expected to access the surrounding roadway network via Bayou Way to the north as depicted in **Exhibit 2**.

Purpose of Analysis

Senate Bill 743 (2013) changed the focus of transportation impact analyses in CEQA from measuring impacts to drivers, to measuring the impact of driving. The change was made by replacing Level of Service (LOS) with VMT. This shift in transportation impact focus was intended to better align transportation impact analyses and mitigation outcomes with the State’s goals to reduce greenhouse gas (GHG) emissions, encourage infill development, and improve public health through more active transportation. LOS or other delay metrics may still be used to evaluate the impact of projects on drivers as part of land use entitlement review, fee programs, and community plan conformance.

In January 2019, the Natural Resources Agency finalized updates to the CEQA Guidelines including the incorporation of SB 743 modifications. The Guidelines’ changes were approved by the Office of Administrative Law and are now in effect. The provisions apply statewide as of July 1, 2020.

To aid lead agencies with SB 743 implementation, the Governor’s Office of Planning and Research (OPR) produced the *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018) that provides guidance regarding the variety of implementation questions they face with respect to shifting to a VMT metric. Key guidance from this document includes:

- VMT is the most appropriate metric to evaluate a project’s transportation impact.
- OPR recommends tour- and trip-based travel models to estimate VMT, but ultimately defers to local agencies to determine the appropriate tools.

- OPR recommends measuring VMT for residential and office Projects on a “per rate” basis.
- OPR states that by adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce VMT. Generally, retail development including stores smaller than 50,000 square feet might be considered local serving.
- Lead agencies have the discretion to set or apply their own significance thresholds.

Sacramento County has published updated Transportation Analysis Guidelines¹ incorporating the changes in transportation impact criteria that resulted from the passage of Senate Bill 743 that are based on the OPR guidance and tailored to meet the County’s specific transportation needs. Key guidance from this document relating to the assessment of VMT impacts for land development projects includes:

- Projects Exempt for Non-VMT Reasons
 - Projects that are either exempt from CEQA, not discretionary, part of an existing certified EIR, or whose discretionary approval does not involve transportation issues, would also be exempt from VMT analysis.
- Screening Criteria
 - Per Table 3-1 of the County’s guidelines, projects that are either small, local-serving, VMT-efficient, near transit, or affordable housing as defined by the guidelines are expected to result in less than significant VMT impacts and would not be required to complete a detailed CEQA transportation analysis.
 - Local-serving retail is defined in the County guidelines as 125,000 square-feet of total gross floor area or less in an infill setting; OR 200,000 square-feet of total gross floor area or less in a greenfield setting; OR if supported by a market study with a capture area of 3-miles or less; AND project does not have any regional-serving uses, as shown in Appendix A.
- VMT Significance Thresholds
 - Residential – the project’s VMT per capita is compared to the regional average of 17.6 VMT per capita. The target is to achieve a project VMT per capita that is 85-percent or less of the regional average, i.e., **less than or equal to 15 VMT per capita**.
 - Office Employment-based land uses – The project’s VMT per employee is compared to the regional average of 16.4 VMT per employee. The target is to achieve a project VMT per employee that is 85-percent or less of the regional average, i.e., **less than or equal to 13.9 VMT per employee**.
 - Industrial Employment-based land uses – The project’s VMT per employee is compared to the regional average of 16.4 VMT per employee. The target is to achieve a project VMT per capita that is equal to or less than the regional average, i.e., **less than or equal to 16.4 VMT per employee**.
 - Regional (Non-Locally Serving) Retail or Public Facilities – The project’s significance threshold is **zero increase in total regional VMT**.

Methodology and Assumptions

Based on the land use information provided, for the purposes of VMT analysis and the determination of transportation related significant impacts, the following land uses were analyzed:

- Local Serving Retail

¹ Transportation Analysis Guidelines, County of Sacramento, September 10,2020.

Per OPR and County Guidelines, because new retail development typically redistributes shopping trips rather than creating new trips, estimating the total change in VMT is the best way to analyze a retail project's transportation impacts and local serving retail generally shortens trips as longer trips from regional retail are redistributed to the new local retail. The Project must demonstrate it meets the trip making characteristics of local serving retail to be screened out from detailed VMT analysis and be presumed to have a less than significant VMT impact.

Analysis

The proposed Project's primary VMT generating use is as an electric vehicle charging stop for both passenger electric vehicles and commercial electric vehicles. As depicted in **Exhibit 2**, the site includes the following features:

- 23 Passenger vehicle charging stalls
- 120 CCS truck charging stalls
- 24 MCS truck charging stalls
- 80 Truck Rest/Parking stalls
- 3,000 square-foot site operations and maintenance building
- 7,000 square-foot convenience store, food outlets, and public center
- 3,000 square-foot WattEV offices for site management and administration
- 10,000 square-foot electric sub station
- 92-acre solar field with 58,880 solar panels

Project trips are anticipated to be primarily pass-by and diverted-link trips from electric vehicle (EV) passenger cars (in the near-term) and trucks (in the long-term) already traveling on I-5 from origins or to destinations within the Sacramento region. Specifically, this EV charging facility will provide long-term charging capacity to electric trucks that service many of the businesses operating in Metro Air Park, located Power Line Road just north of the Project site.

Vehicles are expected to stop on their way into or out of town to charge rather than traveling from their home or work to charge at the Project site. The operations and maintenance building, the convenience store, food outlets, public center, and the WattEV offices are all ancillary uses supporting the main site use of electric vehicle charging and are well below the 200,000 square feet of development allowed for local-serving retail of a greenfield development. In addition, the uses proposed for the Project site do not include regional-serving uses as defined in Appendix A of the County's guidelines.

The solar field and solar substation are proposed to directly support the electric vehicle charging use by producing electricity. For these reasons the site is expected to operate as a local serving development that provides a service to fill an existing and future need in the area and thus is **presumed to have a less than significant transportation impact**.

Conclusions

Based on the results of this analysis, the following conclusions are made:

- The proposed Project is expected to operate like a local serving retail development by providing a needed service to passing electric vehicles. Therefore, the proposed Project is screened out from detailed VMT analysis and **presumed to have a less than significant transportation impact**.


Attachments:

Exhibit 1 – Project Vicinity Map

Exhibit 2 – Project Site Plan

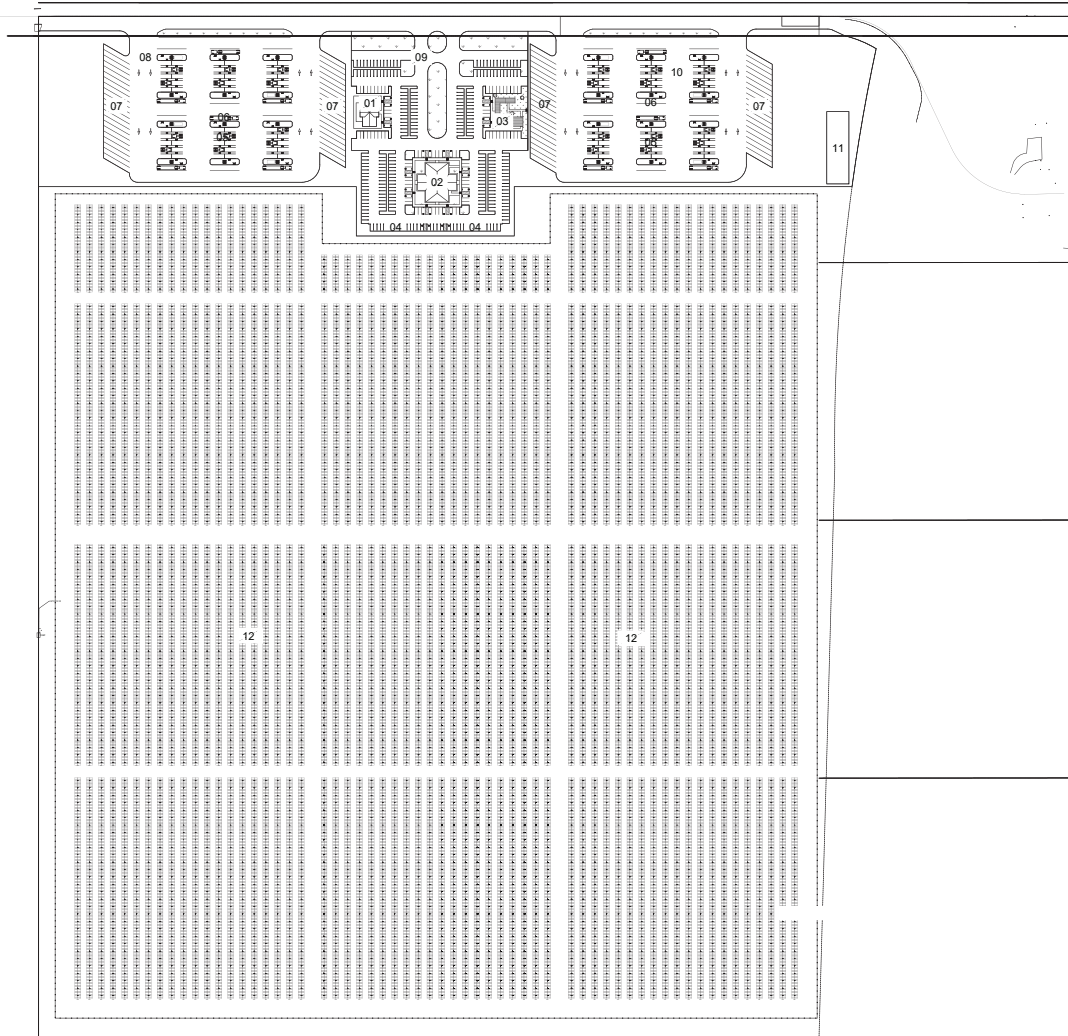


LEGEND

 Project Location



NOT TO SCALE



BUILDINGS AND AREAS

ID	Description	Amount	Unit
01	SITE OPERATION AND MAINTENANCE	3,000	S.F.
02	CONVENIENCE STORE, FOOD OUTLETS, & PUBLIC CENTER	7,000	S.F.
03	WATTEV OFFICES FOR SITE MANAGEMENT & ADMINISTRATION	3,000	S.F.
04	PASSENGER VEHICLES CHARGING STALLS	30	UNITS
05	CCS - TRUCK CHARGING STALLS	120	UNITS
06	MCS - TRUCK CHARGING STALLS	24	UNITS
07	TRUCK REST / PARKING STALLS	80	UNITS
08	WEST TRUCKS CHARGING STATION	4.12	ACRE
09	PUBLIC USE AREA	5.25	ACRE
10	EAST TRUCKS CHARGING STATION	4.12	ACRE
11	ELECRIC SUB-STATION	10,000	S.F.
12	SOLAR FIELD	92	ACRE

VICINITY MAP



Site Plan Date: 08/11/2023