

# California Department of Transportation

OFFICE OF THE DISTRICT 10 DIRECTOR  
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Governor's Office of Planning & Research

**Oct 20 2022**

October 20, 2022

## STATE CLEARINGHOUSE

**10-SJ-580-PM 12.062**  
**Tracy Costco Depot**  
**SCH#2020080531**  
**DEIR**

Genevieve Federighi  
City of Tracy  
333 Civic Center Plaza  
Tracy, CA 95376

Dear Ms. Federighi:

The California Department of Transportation appreciates the opportunity to review the DEIR and Traffic Impact Study (TIS) for the Tracy Costco Depot Annex. The Project would include the construction and subsequent operation of two warehouse buildings that would serve as an annex to the existing Costco Depot located approximately 1.5-miles to the west of the Project and as a Direct Delivery Center. The two buildings total approximately 1,745,052 sf on the Project site. The Project site is located at 16000 West Schulte Road. The Department has the following comments:

1. If the applicant wishes to use STAA trucks at the project site, the applicant will be responsible for making the needed improvements to the highway and acquiring the appropriate STAA Terminal Access approvals.
  - a. The Terminal Access Application letter must be submitted to Jaime Quesada of Caltrans District 10 Freeway & Highway Operations. All local agencies involved in the proposed STAA routes must be CC'd when the application letter is submitted.
  - b. The application letter must include a map showing all the planned routes for STAA trucks accessing the facility, including local roads and internal circulation. Off-tracking analysis must be submitted for review.
  - c. This application should be submitted as early as possible so that Caltrans can evaluate the proposed STAA routes.
  - d. Terminal Access application procedures can be found at the following link:  
<https://dot.ca.gov/programs/traffic-operations/legal-truck-access/ta-process>
2. Caltrans recommends the establishment of programs or methods to reduce VMT such as carpooling and appropriate bicycle, pedestrian, and transit infrastructure.
  - a. The Department also recommends bus stops near the development to serve employees.
  - b. Secure bicycle storage facilities, such as bicycle racks, should also be included.

3. The TIS that was submitted does not use the latest version of the ITE Trip Generation Manual (11th Edition). It is strongly suggested that future studies use the latest version.
4. Table 3.13-1 does not include daily trip generation, which is needed for the VMT analyses.
5. Appendix F (Traffic Analysis) shows 250 employees, which does not match the 400 employees in the IS-NOP document.
6. Appendix F, the information on Tables 1 and 2 are exactly the same as Tables 5 and 6. What is the reason for this redundancy?
7. Please verify that this value of 806.0 is correct in Appendix F-Tables 2 and 6, as is not used in the VMT calculation or referenced anywhere else in the document.
8. In section 3.13 TRANSPORTATION AND CIRCULATION, under VMT Significance Criteria, the statement, "For the surrounding industrial land use area, the City's Draft threshold is 9.4 VMT per employee." This threshold appears to be too low, which indicates an average of 11 VMT per employee for industrial land uses. For this to be the case, practically all such employees would need to come from within Tracy. In reality, at least a portion (even a large portion) of the industrial employees is believed to commute from other communities with cheaper housing costs (e.g., Stockton, Modesto, etc.). Most industrial land uses in Tracy are warehouses/distribution centers, like the Costco Depot project. Therefore, the type of employees should also be similar with similar commute patterns. This calls into suspect the big discrepancy between the threshold and the VMT/employee generated by the project (24.8).
9. The study should include an explanation of how the \$633.11 fee/VMT is calculated.
10. A list of the projects in the VMT Banking Fee Program should be provided along with the cost and the amount of VMT that each project can be expected to reduce.
11. It is stated that the project is not required to mitigate the full VMT impact. If this is supported by OPR or any other CEQA document, please provide a citation. The quoted CAPCOA statement only suggests that up to 15% of the VMT can be reasonably expected to be reducible via TDM measures; it does not mean the project is only required to mitigate 15% of the VMT generated above the threshold.
12. The appendix labeling and order are not the same as listed in the table of content in the latest EIR (September 2022).
13. The TIS shown on page 711 out of 1935 in the DEIR is dated December 16, 2021 and contains highlighted missing information that should be filled. However, the TIS shown in Appendix F is dated September 12, 2022 and contains the completed information. Please make sure that the TIS shown in the main body of the DEIR and the TIS shown in the Appendices are consistent.

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If you have any questions, please contact me at 209-483-2582 or Nicholas Fung at (209) 986-1552.

Sincerely,



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Tom Dumas  
Chief, Office of Metropolitan Planning