

# California Department of Transportation

OFFICE OF THE DISTRICT 10 DIRECTOR  
P.O. BOX 2048 | STOCKTON, CA 95201  
(209) 948-7943 | FAX (209) 948-7179 TTY 711  
[www.dot.ca.gov](http://www.dot.ca.gov)



February 10, 2025

**10-SJ-99-PM 013.15**  
**South Stockton Commerce Center**  
**SCH#2020090561**  
**DEIR**

Nicole D. Moore  
City of Stockton  
345 N. El Dorado Street  
Stockton, CA 95202

Dear Ms. Moore:

The California Department of Transportation appreciates the opportunity to review the Draft Environmental Impact Report proposed South Stockton Commerce Center. The project includes 298 acres of industrial use, 11 acres of commercial use, 54 acres of open space, 41 acres of public facilities, and 19 acres of roadway right-of-way. The project site is located west of the 99 Frontage Road, east of Airport Way, and south of the Stockton Airport. The Department has the following comments:

1. Caltrans concurs with the hydrology study provided and has no further comments on hydraulics.
2. The Traffic Impact Study (TIS) requested in our previous letter dated October 22, 2020 was not included in the DEIR. Therefore, the comments below are still applicable.
3. The project will require a complete Transportation Impact Study to determine the proposed project's near-term and long-term impacts to State highway facilities. This study must be submitted to Caltrans for review and comment prior to project approval. The study must include the following.
  - a. A project description that includes a description and build years of each phase (if phasing) of the project improvements and ultimate buildout improvement.
  - b. Trip generation for each zoning district shown on page 27 of the EIR.
  - c. Highway Capacity Software (HCS) version 7 merge and diverge analysis and intersection operation analysis using Synchro/Simtraffic version 10 for the following interchanges ramps intersections.
    - SR 99/Arch Road interchange
    - SR 99/French Camp interchange
    - I-5/Arch Airport Road interchange
    - I-5/Roth Road interchange
  - d. Provide Synchro/Simtraffic version 10 electronic files and hard copy of complete report of the TIS to include the following analysis scenarios. The years of each scenario should be specified.

- Existing Conditions
  - Project Only
  - Existing Conditions plus Project
  - Cumulative Conditions (Existing Conditions plus Other Approval and Pending Project without this project)
  - Cumulative Conditions with this project
- e. Provide figures to show traffic volumes for AM and PM Peak Hours for each of the scenarios listed in Comment 1d.
- f. The LOS, control delays and 95<sup>th</sup> Percentile queue length should be based on Simtraffic 5 runs, four 15-minute intervals with 10-minute seeding period.
4. SB 743 is changing CEQA analysis of transportation impacts. It requires local land use projects to provide safe transportation systems, reduce per capita vehicle miles traveled (VMT), increase accessibility by mode share of bicycle, pedestrian, and transit travel, and reduce GHG emissions. VMT reduction is necessary to meet the statewide greenhouse gas (GHG) goals. Caltrans recommends VMT per capita thresholds that are 15% below existing regional VMT per capita.
5. The City should work with Caltrans Travel Forecasting Branch to provide updated traffic forecasting volumes for each phase (if phasing) of the project and ultimate buildout.
6. This project requires the needed improvements to the highway and acquiring the appropriate STAA Terminal Access approvals. Terminal Access application procedures can be found at the following link: <http://www.dot.ca.gov/trafficops/trucks/ta-process.html>
7. Caltrans encourages employees to use alternate modes of transportation such as buses, bicycles, and carpools to reach the property. Caltrans also encourages the inclusion of bicycle racks on the property and bus stops nearby.

If you have any questions or would like to discuss our comments in more detail, please contact Nicholas Fung at (209) 948-7190 or myself at (209) 941-1921.

Sincerely,



FOR

TOM DUMAS, CHIEF  
OFFICE OF METROPOLITAN PLANNING