

## California Department of Transportation

DISTRICT 4  
OFFICE OF REGIONAL AND COMMUNITY PLANNING  
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Tiffany Brown, Senior Planner  
City of Morgan Hill  
17555 Peak Avenue  
Morgan Hill, CA 95037

### **Re: Morgan Hill Devco Residential Project – Draft Environmental Impact Report (DEIR)**

Dear Tiffany Brown:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Morgan Hill Devco Residential Project. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system.

The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the November 2023 DEIR.

#### **Project Understanding**

The proposed project would involve the development of 320 residential lots with areas for private open space and public open space. The project location is near State Route (SR)-101. The project would involve off site improvements to several local streets.

#### **Travel Demand Analysis**

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Vehicle Miles Traveled (VMT) analysis for land use projects, please review Caltrans' Transportation Impact Study Guide ([link](#)).

The project's VMT analysis and significance determination are undertaken in a manner consistent with the Office of Planning and Research's (OPR) Technical Advisory. Per the DEIR, this project is found to have a significant VMT impact.

Using Caltrans' Smart Mobility Framework Guide 2020 ([link](#)), the proposed project site is identified as a Suburban where community design and regional accessibility are weak. Given the place, type and size of the project, a robust Transportation Demand Management (TDM) plan should be developed to reduce VMT and greenhouse gas emissions from future development in this area. Please consider the following measures to mitigate the project's impact to VMT:

- Increased location efficiency
- Increased mixed-use development
- Increased transit accessibility
- Integration of affordable housing
- Pedestrian and bicycle network improvements
- Bus rapid transit
- Discounted transit programs
- Increase transit service frequency
- Provide local shuttles to increase transit outreach

The TDM plan should also be documented with annual monitoring reports by a TDM coordinator to demonstrate effectiveness. If the project does not achieve the VMT reduction goals, the reports should also include next steps to take to achieve those targets.

### **Construction-Related Impacts**

Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits ([link](#)). Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the State Transportation Network (STN).

### **Transportation Impact Fees**

We encourage the lead agency to consider identifying project-generated travel demand and assessing the costs of transit and active transportation improvements necessitated by the proposed project. The viable funding sources such as development and/or transportation impact fees may also be utilized to implement the planned transportation improvement projects to sufficiently mitigate project impact.

**Lead Agency**

As the Lead Agency, the City is responsible for all project mitigation, including any needed improvements to the STN. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Marley Mathews, Transportation Planner, via [LDR-D4@dot.ca.gov](mailto:LDR-D4@dot.ca.gov). For future early coordination opportunities or project referrals, please contact [LDR-D4@dot.ca.gov](mailto:LDR-D4@dot.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Luo Yunsheng". The signature is fluid and cursive, with the first name "Luo" being larger and more prominent than the last name "Yunsheng".

YUNSHENG LUO  
Branch Chief, Local Development Review  
Office of Regional and Community Planning

c: State Clearinghouse