

# California Department of Transportation

DISTRICT 4  
OFFICE OF TRANSIT AND COMMUNITY PLANNING  
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[www.dot.ca.gov](http://www.dot.ca.gov)



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Governor's Office of Planning & Research

Kraig Tambornini, Senior Planner  
City of Gilroy  
7351 Rosanna St  
Gilroy, CA 95020

**August 27 2021**

**STATE CLEARINGHOUSE**

## **Re: Project Garlic Industrial Subdivision Draft Mitigated Negative Declaration (MND)**

Dear Kraig Tambornini:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Project Garlic Industrial Subdivision. 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 following comments are based on our review of the July 2021 Draft MND.

### **Project Understanding**

The project proposes to develop a 59.7-acre parcel along SR-152 in three phases. Phase 1 would include the construction of a 141,360 square foot delivery station, including 16,824 square feet of office space and 124,536 square feet of warehouse space. Phase 2 would include construction of a 266,220 square foot industrial building, including 10,000 square feet of office space and 256,220 square feet of warehouse space. Phase 3 would be set aside for future commercial uses.

### **Travel Demand Analysis**

Caltrans commends the Lead Agency in developing the Transportation Demand Management (TDM) Plan to reduce employee VMT, therefore working towards meeting the State's goal of a 15-percent reduction. The project VMT analysis and significance determination are undertaken in a manner consistent with the Office of Planning and Research's (OPR) Technical Advisory. The proposed measures identified in the TDM plan should be documented with annual monitoring reports to demonstrate effectiveness.

## **Highway Operations**

*Appendix H, Transportation Analyses, Table 10.* Please note that the actual ramp capacity may be lower than the capacity assumed in the ramp analysis due to surges in freeway demand during peak periods. To understand the full impacts of the project on the affected freeway segments, Caltrans recommends that an updated queuing analysis be performed for the following ramp terminal intersections to determine whether vehicle queues can be accommodated within the ramps:

- US 101 southbound off-ramp to Tenth Street/SR-152
- US 101 northbound diagonal on-ramp from SR-152

Vehicle queues due to project-added traffic shall be accommodated within the ramps and multimodal safety should not be impacted.

## **Freight**

Due to a general shortage in truck parking options within the greater San Francisco Bay Area, and especially in Santa Clara County, Caltrans is working to better understand the needs of truck drivers and find better ways to accommodate them to improve roadway conditions, reduce congestion and increase safety for both truck drivers and the traveling public.

The San Francisco Bay Area is also a nonattainment area for particulate matter 2.5 microns or less in diameter which is primarily generated through the combustion of diesel fuel from trucks and other heavy-duty equipment. Due to these overall concerns, we request considerations for on-site short and long-term truck parking, on-site truck maintenance and on-site zero emission truck infrastructure to improve safety, reduce pollution and emissions.

## **Aesthetics**

Views of agricultural land and other open space areas can be considered scenic views. Depending on viewer sensitivity, the visual impact of the project may be greater than stated in the visual analysis. Caltrans recommends that the project decrease spacing between tree plantings or plant larger sized trees to provide greater screening to soften buildings and added paved surfaces.

## **Hydrology**

Please include information regarding the detention times and infiltration rates of the basins, as well information on who will maintain these facilities.

### **Hazardous Waste**

Due to previous agricultural land uses, project areas of proposed soil excavation should be tested and characterized for contaminants, including pesticides and herbicides. The following tests are recommended:

- CAM 17 Metals - EPA 6010
- TPH-mo, TPH-d - EPA 8015-M
- TPH-g - EPA 8015-M
- Cr6+ - EPA 7199
- Pesticides - EPA 8081A
- Herbicides - EPA 8151

### **Construction-Related Impacts**

Potential impacts to the State Transportation Network (STN) from project-related temporary access points should be analyzed. Mitigation for significant impacts due to construction and noise should be identified. 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, visit: <https://dot.ca.gov/programs/traffic-operations/transportation-permits>. Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the STN.

### **Lead Agency**

As the Lead Agency, the City of Gilroy 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.

### **Equitable Access**

If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

### **Encroachment Permit**

Please be advised that any permanent work or temporary traffic control that encroaches onto the State Right-of-Way (ROW) requires a Caltrans-issued encroachment permit. As part of the encroachment permit submittal process, you may be asked by the Office of Encroachment Permits to submit a completed encroachment permit application package, digital set of plans clearly delineating the State ROW, digital copy of signed, dated and stamped (include stamp expiration date) traffic control plans, this comment letter, your response to the comment letter,

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and where applicable, the following items: new or amended Maintenance Agreement (MA), approved Design Standard Decision Document (DSDD), approved encroachment exception request, and/or airspace lease agreement. Your application package may be emailed to D4Permits@dot.ca.gov.

To download the permit application and to obtain more information on all required documentation, visit <https://dot.ca.gov/programs/traffic-operations/ep/applications>.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Llisel Ayon at Llisel.Ayon@dot.ca.gov. Additionally, for future notifications and requests for review of new projects, please email LDIGR-D4@dot.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Mark Leong". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

MARK LEONG  
District Branch Chief  
Local Development - Intergovernmental Review

c: State Clearinghouse