

## California Department of Transportation

DISTRICT 4  
OFFICE OF REGIONAL AND COMMUNITY PLANNING  
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Gloria Sciara, Senior Planner  
City of Gilroy  
7351 Rosanna Street  
Gilroy, CA 95020

### Re: Gilroy Data Center – Draft Environmental Impact Report (DEIR)

Dear Gloria Sciara:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Gilroy Data Center project. 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 August 2024 DEIR.

Please note this correspondence does not indicate an official position by Caltrans on this project and is for informational purposes only.

#### Project Understanding

The proposed project involves the construction of two data center buildings totaling approximately 438,500 square feet as well as an onsite switchyard and a new utility substation. The project is located near U.S.101.

#### 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 VMT analysis for land use projects, please review Caltrans' Transportation Impact Study Guide ([link](#)).

The project vehicle miles traveled (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 without further VMT policies from the City of Gilroy, this project is found to have a significant VMT impact with incorporated mitigation. The

voluntary commute trip reduction program stated in the report should be documented with annual monitoring reports to demonstrate effectiveness.

The City's VMT/GHG Reduction Program has been awarded through Caltrans' Sustainable Transportation Planning Program. This project aims to develop a citywide VMT reduction/transportation demand management policy tailored to the unique needs of Gilroy. The City may consider adopting its own VMT policy and impact threshold or developing a citywide VMT mitigation program through which an individual project with limited onsite VMT mitigation options to contribute. Caltrans looks forward to working with the City on this project.

### **Lead Agency**

As the Lead Agency, the City is responsible for all project mitigation, including any needed improvements to the State Transportation Network (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.

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

For future early coordination opportunities or project referrals, please visit Caltrans LDR website ([link](#)) or contact [LDR-D4@dot.ca.gov](mailto:LDR-D4@dot.ca.gov).

Sincerely,



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

c: State Clearinghouse