

## California Department of Transportation

OFFICE OF THE DISTRICT 10 DIRECTOR  
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June 14, 2023

10-SJ-12-PM 010.607  
PA-2200217, PA-2200220, PA-2200230  
**Interstate 5 Commerce Center Project**  
**Greenlaw Grupe Jr Operating Company**

Robby Thacker  
San Joaquin County  
1810 East Hazelton Avenue  
Stockton, CA 95205

Dear Mr. Thacker:

The California Department of Transportation appreciates the opportunity to review the Notice of Preparation for an Environmental Impact Report (NOP for EIR) for the proposed wholesale and distribution facility at 6015 W. State Route 12, Lodi, located east of Interstate 5 and north of State Route 12. The project will include six buildings, 2,258 parking stalls, and 934 truck/trailer parking stalls. The Department has the following comments:

1. The applicant must provide a site plan stamped by a licensed land surveyor showing they have access rights at the proposed access point, as much of the proposed project's SR 12 frontage is access restricted. Please submit this to Caltrans for review and comment prior to project approval.
2. If the project proponent desires access onto SR 12, a dedicated right-turn lane and a dedicated left-turn lane on SR 12 into the proposed driveway needs to be considered. This highway widening and installation of these safety mitigations will allow motorists to get off the mainline traffic safely before making a right turn or left turn into the proposed driveway.
3. Any new proposed driveway onto SR-12 needs to be designed up to current Caltrans standards and accommodate the project truck traffic.
4. A Transportation Impact Study (TIS) needs to be submitted to Caltrans for review and comment prior to project approval. This study must be prepared per Caltrans Vehicle Miles Traveled-Focused Transportation Impact Study Guide (TISG) May 20,

2020, and Governor's Office of Planning and Research's (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA December 2018.

5. All the analysis results such as Synchro/SimTraffic outputs, existing traffic count data, and related analysis results need to be included in the TIS.
6. It is expected that the TIS's queue analysis results be shown in SimTraffic instead of Synchro to measure the full impact of queueing and blocking since SimTraffic is designed to model networks of signalized and unsignalized intersections, closely spaced intersections with blocking problems, the effects of signals on nearby unsignalized intersections and driveways. To determine if studied intersections operate in coordination (especially queue distances between signalized intersections, between signalized and unsignalized intersections), they need to be coded as actuated coordinated. Additionally, SimTraffic should include 10-minute seed time and 60-minute record time of 15-minute interval, and the model should be recorded with 5 to 10 simulation runs. Please use Synchro/SimTraffic V11 for the analysis.
7. SB 743 has changed CEQA analysis of transportation impacts. It requires local land use projects to provide safe transportation system, reduce per capita VMT, increase accessibility by mode share of bicycle, pedestrian, transit travel, and reduce greenhouse gas (GHG) emissions. VMT reduction is necessary to meet the statewide GHG. Caltrans recommends VMT per capital thresholds that are 15% below existing regional VMT per capita. The Transportation Impact Study (TIS) will need to include VMT analysis (including induced travel demand) to determine significance of those impacts and identify potential mitigation measures. Caltrans also recommends establishment of programs or methods to reduce VMT and support appropriate bicycle, pedestrian, and transit infrastructure.
8. In addition to the use of the VMT metric, the TIS needs to determine how that State Highway System may otherwise be affected by the proposed project, particularly as it relates to safety of the traveling public. The analysis will include traffic queue analyses at the following intersections
  - I-5 southbound offramp/SR 12
  - I-5 northbound offramp/SR 12
  - Thornton Road/SR 12
  - Proposed driveway/SR 12
  - I-5/Turner Road interchange
  - Turner Road/Thornton Road intersection
9. The TIS needs to provide the proposed project's trip generations/distributions per the Trip Generation Manual, Institute of Transportation Engineers (ITE), as well as

the traffic volumes at the above-mentioned studied intersections for the queue analysis.

10. The TIS needs to include queue analysis for the following conditions:
  - Existing Year
  - Existing Year Plus Proposed Project
  - Existing Year Plus Proposed Project Plus Any Approved/Pending Projects
  - Cumulative Conditions
  - Cumulative Conditions Plus Proposed Project
11. The intersection analysis at the existing signalized intersections of I-5 SB offramp/SR 12, I-5 NB offramp/SR 12, and Thornton Road/SR-12 needs to be based on the existing signal timings. If necessary, please contact D10 Signal and Ramp Metering Operations for the existing signal timings.
12. The TIS needs to address truck traffic and circulation onto and off of the project site, including at any proposed access point onto SR 12.
13. If the project proposes to use STAA truck, then please submit a Terminal Access Application to the County of San Joaquin and Caltrans District 10 Freeway & Highway Operations, Armando Soria, to evaluate the proposed driveway/Thornton Road for STAA truck terminal access.
14. Please submit the pre and post construction runoff calculations and drainage plans to Caltrans for review and comment prior to project approval. Additional review will be done once drainage plans and calculations are submitted. The proposed site development is adjacent to the state route. The developer needs to ensure that the existing State drainage facilities will not be significantly impacted by the project. If historical undeveloped topography shows drainage from this site flowed into the State Right-of-Way, it may continue to do so with the conditions that peak flows may not be increased from the pre-construction quantity and the site runoff be treated to meet present storm water quality standards. If historical undeveloped topography shows drainage from this site did not flow into the State Right-of-Way, then it will not be allowed to flow into the State Right-of-Way at this time.
15. An Encroachment Permit will be required for work (if any) done within the Department's right of way. This work is subject to the California Environmental Quality Act. Therefore, environmental studies may be required as part of the encroachment permits application. A qualified professional must conduct any such studies undertaken to satisfy the Department's environmental review responsibilities. Ground disturbing activities to the site prior to completion and/or

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approval of required environmental documents may affect the Department's ability to issue a permit for the project. Furthermore, if engineering plans or drawings will be part of your permit application, they should be prepared in standard units.

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

Sincerely,



Tom Dumas  
Chief, Office of Metropolitan Planning