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Governor's Office of Planning & Research

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STATE CLEARINGHOUSE



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Cindy McCormick, Senior Planner City of Gilroy 7351 Rosanna Street Gilroy, CA 95020

Gilroy 2040 General Plan – Draft Environmental Impact Report (DEIR)

Dear Cindy McCormick:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Gilroy 2040 General Plan. 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 June 2020 DEIR.

Project Understanding

The city of Gilroy lies at the junction of two important transportation corridors: US-101 and State Route (SR)-152. The Gilroy 2040 General Plan, which updates the previously adopted Gilroy 2020 General Plan, will provide a framework for interjurisdictional coordination of planning efforts among officials, city staff and other government agencies. The Gilroy 2040 General Plan is made up of two documents: Background Report and Policy Document. As the essence of the 2040 General Plan, the Policy Document contains nine elements: Land Use, Mobility, Economic Prosperity, 2015-2023 Housing, Public Facilities and Services, Parks and Recreation, Natural and Cultural Resources, Potential Hazards, and Environmental Justice.

This General Plan retains the existing Urban Growth Boundary. The development potential resulting from this General Plan includes up to 6,477 new housing units (single-family and multi-family), an additional population of 19,576 and 21,434 new jobs, which could be reached assuming all under-utilized land is

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redeveloped and vacant land is developed, all consistent with the land use designations in the Gilroy 2040 General Plan Land Use Diagram-Preferred Alternative.

Highway Operations

As indicated in the Appendix G, Transportation Report, the results of the transportation analysis show that seven freeway segments and four freeway ramps are projected to operate at an unacceptable level of service under 2040 General Plan conditions. In addition to the proposed possible freeway segment and freeway ramp improvements identified in the report, please also consider the following freeway improvement projects:

- US-101/SR-25 Interchange
- SR-25/Bolsa Road Roundabout
- SR-152 Realignment project

Vehicle Trips Reduction

With the enactment of Senate Bill (SB) 743, Caltrans is focusing on transportation infrastructure that supports smart growth and efficient development to ensure alignment with State policies using efficient development patterns, innovative travel demand reduction strategies, multimodal improvements, and Vehicle Miles Traveled (VMT) as the primary transportation impact metric.

Based on the results of the VMT evaluation in the DEIR, both the residential VMT and employment VMT projections under the Gilroy 2040 General Plan conditions would be above the threshold established by the city. The Mitigation Measure session indicated that the implementation of TRANS-1 would reduce VMT, but there is no guarantee that these measures would reduce this significant impact to a less-than-significant level.

If projects within the General Plan do not achieve the VMT reduction goals, the city should also consider next steps to take to achieve those targets. Please ensure that the Transportation Demand Management (TDM) programs should be documented with annual monitoring reports by a TDM coordinator to demonstrate effectiveness. For more TDM options to be considered to further reduce VMT, please refer to the Federal Highway Administration's Integrating Demand Management into the Transportation Planning Process: A Desk Reference (Chapter 8). The reference is available online at: http://www.ops.fhwa.dot.gov/publications/fhwahop12035/pdf.

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Lead Agency

As the Lead Agency, the City of Gilroy 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.

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

Sincerely,

Mark Leong

District Branch Chief

Local Development - Intergovernmental Review

cc: State Clearinghouse

Mark Leong