

California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
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October 08, 2026

SCH #: 2025010214
GTS #: 04-SCL-2025-01570
GTS ID: 35201
Co/Rt/Pm: SCL/152/6.9

Aaron Campbell, Senior Planner
City of Gilroy
7351 Rosanna Street
Gilroy, CA 95020

Re: 2480 & 2740 Hecker Pass Subdivision — Draft Environmental Impact Report (DEIR)

Dear Aaron Campbell:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the 2480 & 2740 Hecker Pass Subdivision 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 2026 Draft EIR.

Please note this correspondence does not indicate an official position or approval by Caltrans on this project.

Project Understanding

The proposed project consists of development of 116 single-family homes, including nine low-income units, a new circulation system, private and public open spaces, and enhances tree landscaping. The project location is adjacent to State Route 152 Caltrans right-of-way (ROW).

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 VMT analysis and significance determination are undertaken in a manner consistent with the Office of Land Use and Climate Innovation's (LCI) Technical

Advisory. Per the DEIR, this project is found to have a significant and unavoidable VMT impact. Please consider additional measures to mitigate the project's impact on VMT.

We encourage the project applicant to develop and implement an effective Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions from future development in this area. TDM programs should 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.

Please also consider the measures listed below are quantified by California Air Pollution Control Officers Association (CAPCOA) and shown to have different efficiencies reducing regional VMT:

- Provide Electric Vehicle Charging Infrastructure
- Provide Secure Bike Parking
- Provide Pedestrian Network Improvement
- Construct or Improve Bike Facility
- Construct or Improve Bike Boulevard
- Expand Bikeway Network
- Provide Traffic Calming Measures
- Create Urban Non-motorized zones
- Dedicate Land for Bike Trails

Please also consider exploring the following options to help further reduce the VMT impact if the implementation of applicable TDM measures is insufficient to mitigate the project VMT impact to a less-than-significant level: VMT based Transportation Impact Fee program, VMT Mitigation Exchange, and VMT Mitigation Bank. Please note that Caltrans has funded several local/regional agencies to study the feasibility of a variety of VMT mitigation programs through the Sustainable Transportation Planning Grant program ([link](#)). Caltrans welcomes the potential opportunities to work with the City.

Hydrology

Please ensure that any increase in storm water runoff to State Drainage Systems or Facilities be treated, contained on project site, and metered to preconstruction levels. Any floodplain impacts must be documented and mitigated.

It is recommended that Stormwater Control Plan Sheets (Appendix E – Attachment H) show existing State drainage facilities (ditches, culverts, inlets, etc.) with arrows depicting flow directions in a dropped-out color/pattern. This delineation will help to understand drainage patterns along SR 152 and confirm that the proposed development does not drain toward Caltrans ROW.

Please specify what flows the proposed drainage system in the northwest corner of Lot 90 will intercept and how. And please clarify if there will be a ditch that is graded to the inlet of the drainage system.

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).

Equitable Access

If any Caltrans facilities are impacted by the project, those facilities must meet Americans with 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 temporary or permanent work including traffic control that encroaches in, under, or over any portion of the State highway Rights-of-Way (ROW) requires a Caltrans-issued encroachment permit.

The Office of Encroachment Permits requires 100% complete design plans and supporting documents to review and circulate the permit application package. Project plans within State ROW must clearly show the State ROW line for the whole plan limits along with all existing roadway features (lane lines, edge of pavement, curbs, existing signage, trees and utility poles, etc.). Please ensure that proposed work within Caltrans ROW conforms with the latest versions of the Caltrans Highway Design Manual ([link](#)) and Caltrans Standard Plans and Specifications ([link](#)).

The review and approval of encroachment projects is managed through the Encroachment Permits Office Process (EPOP) or the Project Delivery Quality Management Assessment Process (QMAP), depending on project scope, complexity, and completeness of the application. Please use the following resources to determine the appropriate review process:

- TR-0416 Applicant's Checklist ([link](#))
- Caltrans Encroachment Projects Processes – Information Video ([link](#))

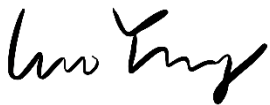
- Flowchart, Figure 1.2 in Section 108, Overview of the Encroachment Review Process, of Chapter 100 – The Permit Function, Caltrans Encroachment Permit Manual ([link](#))

The permit approval typically takes less than 60 days, but may take longer depending on the project scope, size, complexity, completeness, compliance with applicable laws, standards, policies, and quality of the permit package submitted. Projects requiring exceptions to design standards, exceptions to encroachment policies, maintenance agreements, or external agency approvals may need more time to process.

To obtain more information and download the permit application, please visit Caltrans Encroachment Permits ([link](#)).

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Curtis Dong, Associate Transportation Planner via 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.

Sincerely,



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

c: State Clearinghouse