

DOCKETED

Docket Number:	21-SPPE-02
Project Title:	STACK Trade Zone Park
TN #:	249090
Document Title:	California Department of Transportation Comments on Draft Environmental Impact Report
Description:	Dated March 10, 2023
Filer:	Lisa Worrall
Organization:	California Department of Transportation
Submitter Role:	Public Agency
Submission Date:	3/10/2023 2:12:48 PM
Docketed Date:	3/10/2023

California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D | OAKLAND, CA 94623-0660
www.dot.ca.gov



March 10, 2023

SCH #: 2022060141
GTS #: 04-SCL-2022-01163
GTS ID: 26675
Co/Rt/Pm: SCL/ 880/ 6.661

Lisa Wornall, Senior Environmental Planner
California Energy Commission
1516 Ninth Street, MS-48
Sacramento, CA 95814

Re: STACK Trade Zone Park Project Draft Environmental Impact Report (DEIR)

Dear Lisa Wornall:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the STACK Trade Zone Park Project. 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 January 2023 DEIR.

Project Understanding

The proposed project includes one four-story advanced manufacturing building (approximately 135,000 square feet), two three-story data center buildings (approximately 527,000 square feet), a parking garage, related utility infrastructure, and a backup generating facility with a generation capacity of up to 90 MW. The backup generating facility would consist of 36 3-MW and two 1-MW diesel-fired emergency backup generators (gensets) arranged in two generation yards, each designed to serve one of the two data center buildings (SVYDC 05 and SVYDC 06). The proposed project is approximately 0.7 miles from I-880.

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 Transportation Impact Studies, 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 Planning and Research's (OPR) Technical Advisory. Per the DEIR, this project is found to have *Less Than Significant VMT impact with Mitigation Incorporated*. Caltrans supports the mitigation strategies proposed, TRANS-1, which include pedestrian network improvements and traffic calming measures. Caltrans supports the mitigation measures to increase active transportation mode-share in the project area by creating an accessible network to all transportation users.

Lead Agency

As the Lead Agency, the California Energy Commission 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.

Encroachment Permit

Please be advised that any permanent work or temporary traffic control that encroaches onto Caltrans' 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 Caltrans' ROW, digital copy of signed, dated and stamped (include stamp expiration date) traffic control plans, this comment letter, your response to the comment letter, 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.

Please note that Caltrans is in the process of implementing an online, automated, and milestone-based Caltrans Encroachment Permit System (CEPS) to replace the current permit application submittal process with a fully electronic system, including online payments. The new system is expected to be available during 2023. To obtain information about the most current encroachment permit process and to download the permit application, please visit <https://dot.ca.gov/programs/traffic-operations/ep/applications>.

Lisa Wornall, Senior Environmental Planner
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Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, or for future notifications and requests for review of new projects, please email LDR-D4@dot.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Mark Leong". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

MARK LEONG
District Branch Chief
Local Development Review

c: State Clearinghouse