

# Appendix A

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Comment Letters

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## California Department of Transportation

DISTRICT 4  
OFFICE OF REGIONAL AND COMMUNITY PLANNING  
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June 2, 2025

SCH #: 2024070432  
GTS #: 04-SCL-2024-01408  
GTS ID: 33347  
Co/Rt/Pm: SCL/237/VAR

Jay Lee, Planning Director  
City of Milpitas  
455 E. Calaveras Boulevard  
Milpitas, CA 95035

### **Re: Gateway-Main Street Specific Plan Project – Draft Environmental Impact Report (DEIR)**

Dear Jay Lee:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Gateway-Main Street Specific Plan 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 April 2025 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 will guide the land use and development of the Specific Plan's Focus Area. The Plan will implement the City's economic development strategy and will plan for high-density, transit-oriented housing to create a mixed-use community. The project area is located along State Route (SR)- 237 and Interstate 880 (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 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 VMT impact. Please consider the following measures to mitigate the project's VMT impact.

### **Mitigation Strategies**

Caltrans Smart Mobility Framework Guide defines a place type based on four physical elements: built form, land use, mobility options, and people. 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:

- Increase Residential Density
- Increase Job Density
- Provide Transit-Oriented Development
- Integrate Affordable and Below Market Rate Housing
- Improve Street Connectivity
- Locate Project/Developments in Area with High Destination Accessibility
- Improve Destination Accessibility in Underserved Areas
- Orient Project/Developments Toward Transit, Bike, or Pedestrian Facility
- Locate Project/Developments near Bike Path/Bike Lane
- Provide Pedestrian Network Improvement
- Construct or Improve Bike Facility
- Construct or Improve Bike Boulevard
- Expand Bikeway Network
- Implement Shared Vehicle Program (car/bike/E-bike/scooter)
- Provide Traffic Calming Measures
- Create Urban Non-motorized zones
- Dedicate Land for Bike Trails
- Extend Transit Network Coverage or Hours
- Increase Transit Service Frequency
- Implement Transit-Supportive Roadway Treatments
- Provide Bus Rapid Transit
- Reduce Transit Fares
- Improve Transit Access, Safety, and Comfort
- Provide Bike Parking Near Transit

Jay Lee, Planning Director

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- Provide Electric Vehicle Charging Infrastructure
- Limit Residential Parking Supply
- Implement Market Price Public Parking (On-Street)
- Provide Secure Bike Parking
- Implement Area or Cordon Pricing
- Replace Traffic Controls with Roundabout
- Required Project Contributions to Transportation Infrastructure Improvement
- Install Park-and-Ride Lots

### **VMT Mitigation Program**

Please note that the Valley Transportation Authority's (VTA) Equitable VMT Mitigation Program for Santa Clara County ([link](#)) was awarded through Caltrans' Sustainable Transportation Planning Program to assist local agencies in identifying and quantifying mitigations to VMT impacts and improve multimodal transportation to serve Santa Clara's residents. The County is encouraged to collaborate with Caltrans and VTA to assess and develop a regional VMT mitigation program to reduce VMT in an effective and feasible manner.

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



May 30, 2025

City of Milpitas  
455 E. Calaveras Blvd  
Milpitas CA 95035  
Attn: Jay Lee

Dear Jay,

VTA appreciates the opportunity to review and provide comments on the draft Subsequent Environmental Impact Report (SEIR) for the Gateway-Main Street Specific Plan for the City of Milpitas.

VTA has reviewed the document and has the following comments:

Mitigation Measures for Vehicle Miles Traveled (VMT) Impact

The Draft Subsequent EIR identifies a Significant and Unavoidable impact regarding VMT, Impact 3.11-2, which was also identified in the Milpitas General Plan Update EIR in 2021. The DSEIR includes several mitigation measures (Mitigation Measures 3.11-2a through 3.11-2f) to lessen this VMT impact, which VTA supports.

VTA recommends that the City should clearly specify the responsible parties, schedule, and monitoring / reporting procedures for Mitigation Measures 3.11-2a through 3.11-2f in the project's Mitigation Monitoring and Reporting Program. To the greatest extent possible, VTA recommends having monitoring of these VMT mitigation measures performed by an independent third-party, paid for by future developers and/or property managers, rather than through self-reporting. Mitigation Measure 3.11-2b regarding Employer-Sponsored Vanpool or Shuttle Service mentions that a Transportation Management Association (TMA) could play a role in coordinating funding for a shuttle program; VTA notes that forming a TMA would help implement and monitor many of the VMT mitigation measures identified in the DSEIR.

For Mitigation Measure 3.11-2a (Implement Commute Trip Reduction Program) VTA recommends that any such program should coordinate with and promote programs that already exist in Santa Clara County, including the VTA / MTC Vanpool Subsidy Program, VTA Guaranteed Ride Home Program, and transit incentive programs such as VTA SmartPass, Clipper START, and Clipper BayPass.

Thank you again for the opportunity to review this plan and serve on the plan's Technical Advisory Committee. If you have any questions, please do not hesitate to contact me at [triana.crighton@vta.org](mailto:triana.crighton@vta.org), or the VTA Land Use and Development Review team at [plan.review@vta.org](mailto:plan.review@vta.org)

Sincerely,

A handwritten signature in black ink, appearing to read "T. Crighton".

Triana Crighton  
Senior Transportation Planner  
[ML2401]