

California Department of Transportation

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August 21, 2023

11-SD-67
PM 11.879

Sycamore Canyon/Goodan Ranch Preserve
Resource Management Plan Update
MND/SCH# 2023070450

Ms. Emily Pacholski
Land Use/Environmental Planner
County of San Diego
5500 Overland Avenue, Suite 410
San Diego, CA 92123

Dear Ms. Pacholski:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Mitigated Negative Declaration (MND) for the Sycamore Canyon/Goodan Ranch Preserve Resource Management Plan Update located near State Route 67 (SR-67). The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Safety is one of Caltrans' strategic goals. Caltrans strives to make the year 2050 the first year without a single death or serious injury on California's roads. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners. We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

We look forward to working with the County of San Diego in areas where the County of San Diego and Caltrans have joint jurisdiction to improve the transportation network and connections between various modes of travel, with the goal of improving the experience of those who use the transportation system.

Caltrans has the following comments:

Traffic Engineering and Analysis

The SR-67 shoulders are for emergency use only and not for parking for access to trails. All pedestrians visiting the preserve trails should be encouraged to park at Goodan Ranch Staging Area parking or Rock and Roll trailhead parking, and not high-speed roadways and shoulders. Caltrans is concerned that visitors to the potential future trail connection #26 and proposed trail #29, will use SR-67 shoulders for parking. Should the potential and proposed trails, #26 and #29, be approved, parking along SR-67 will need to be prohibited. Place "No Parking Any Time" signs along the lanes beyond the edge of shoulder area to prevent vehicles parking along SR-67. Coordination with Caltrans would be needed for location of signage in State Right-of-Way (R/W).

Hydrology and Drainage Studies

Caltrans generally does not allow development projects to impact hydraulics within the State's R/W. Any modification to the existing Caltrans drainage and/or increase in runoff to State facilities will not be allowed. Early coordination with Caltrans is recommended.

Complete Streets and Mobility Network

Caltrans views all transportation improvements as opportunities to improve safety, access and mobility for all travelers in California and recognizes bicycle, pedestrian and transit modes as integral elements of the transportation network. Caltrans supports improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements that promotes a complete and integrated transportation network. A marked crosswalk on the north leg of Scripps Poway Parkway and SR-67 may be beneficial. Early coordination with Caltrans, in locations that may affect both Caltrans and the County of San Diego, is encouraged.

To reduce greenhouse gas emissions and achieve California's Climate Change target, Caltrans is implementing Complete Streets and Climate Change policies into State Highway Operations and Protection Program (SHOPP) projects to meet multi-modal mobility needs. Caltrans looks forward to working with the County to evaluate potential Complete Streets projects.

Bicycle, pedestrian, and public transit access during construction is important. Mitigation to maintain bicycle, pedestrian, and public transit access during construction is in accordance with Caltrans' goals and policies.

Hauling/Traffic Control

Caltrans has discretionary authority with respect to highways under its jurisdiction and may, upon application and if good cause appears, issue a special permit to operate or move a vehicle or combination of vehicles or special mobile equipment of a size or weight of vehicle or load exceeding the maximum limitations specified in the California Vehicle Code. The Caltrans Transportation Permits Issuance Branch is responsible for the issuance of these special transportation permits for oversize/overweight vehicles on the State Highway network. Additional information is provided online at: <http://www.dot.ca.gov/trafficops/permits/index.html>.

A Traffic Control Plan is to be submitted to Caltrans District 11, including the interchanges at SR-67/Scripps Poway Parkway, at least 30 days prior to the start of any construction. Traffic shall not be unreasonably delayed. The plan shall also outline suggested detours to use during closures, including routes and signage. Potential impacts to the highway facilities (SR-67) and traveling public from the detour, demolition and other construction activities should be discussed and addressed before work begins.

Noise

The applicant must be informed that in accordance with 23 Code of Federal Regulations (CFR) 772, Caltrans is not responsible for existing or future traffic noise impacts associated with the existing configuration of SR-67.

Environmental

Caltrans welcomes the opportunity to be a Responsible Agency under the California Environmental Quality Act (CEQA), as we have some discretionary authority of a portion of the project that is in Caltrans' R/W through the form of an encroachment permit process. We look forward to the coordination of our efforts to ensure that Caltrans can adopt the alternative and/or mitigation measure for our R/W.

An encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide approved final environmental documents for this project, corresponding technical studies, and necessary regulatory and resource agency permits. Specifically, CEQA determination or exemption. The supporting documents must address all environmental impacts within the Caltrans' R/W and address any impacts from avoidance and/or mitigation measures.

We recommend that this project specifically identifies and assesses potential impacts caused by the project or impacts from mitigation efforts that occur within Caltrans' R/W that includes impacts to the natural environment, infrastructure including but not limited to highways, roadways, structures, intelligent transportation systems elements,

on-ramps and off-ramps, and appurtenant features including but not limited to fencing, lighting, signage, drainage, guardrail, slopes and landscaping. Caltrans is interested in any additional mitigation measures identified for the project's draft Environmental Document.

Hazardous Waste

The Hazards and Hazardous Materials (Section IX) portion of the Draft CEQA Initial Study attached to the Draft MND may not satisfy the requirements to evaluate and address hazardous waste impacts from the proposed project. Potential hazardous materials (i.e., naturally occurring asbestos [NOA] and aerially deposited lead [ADL]) exist within or adjacent to the Preserve, and if these hazardous materials are disturbed, they could potentially generate a hazardous waste requiring proper management and/or disposal.

A hazardous waste concern for this proposed project is aerially deposited lead (ADL)-contaminated soil along SR-67, where potential future trail connection #26 and proposed trail #29 connects to SR-67. Elevated levels of ADL are common in the soil adjacent to State highways and can also be found underneath some existing road surfaces due to past construction activities. ADL is generally found within 30 feet of the edge of the pavement and within the top six inches of the soil. In some cases, the lead is as deep as two to three feet below the surface. The Department of Toxic Substances (DTCS) sets regulatory thresholds for lead in soil, based on risk assessments performed by CalEPA's Office of Environmental Health Hazard Assessment (OEHHA). If soils are disturbed adjacent to SR-67, it is the Lead Agency's responsibility to comply with the DTSC ADL requirements for roadway soil management.

In addition, publicly available records indicate NOA may be present within the Preserve along proposed trails #22a and #22b of the #22 Rock and Roll Trail, northern proposed trail along the #14 Ridge Trail (located south of the 67 Staging Area), and the 67 Staging Area. See Attachment 1 for a map of the NOA rock unit mapped within the Preserve. It is recommended to conduct appropriate studies to evaluate this potential hazardous material.

Right-of-Way

Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.

Any work performed within Caltrans' R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide an approved final

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environmental document including the California Environmental Quality Act (CEQA) determination addressing any environmental impacts with the Caltrans' R/W, and any corresponding technical studies.

Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158 or emailing D11.Permits@dot.ca.gov or by visiting the website at <https://dot.ca.gov/programs/traffic-operations/ep>. Early coordination with Caltrans is strongly advised for all encroachment permits.

If you have any questions or concerns, please contact Sandy Vazquez, LDR Coordinator, at (619) 987-3580 or by e-mail sent to Sandra.Vazquezdot.ca.gov.

Sincerely,

Kimberly Dodson for

MAURICE A. EATON
Branch Chief
Local Development Review