California Department of Transportation

OFFICE OF THE DISTRICT 10 RURAL PLANNING
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September 25, 2025

Mr. Ben Goger
Senior Community Design &
Development Planner
5100 Buillion Street
Mariposa, CA 95338

Mariposa Creek Parkway Phase III – Hillside Trails Project
Initial Study - Mitigated Negative Declaration (ISMND)
SCH #2025081254

Dear Mr. Goger,

The Department of Transportation (Caltrans) appreciates the opportunity to review and comment on the Hillside Trails Project Initial Study that proposes to construct approximately 12.3 miles of nature trails branching off the planned Phase III section of the Mariposa Creek Parkway Trail. The total project area consists of approximately 235 acres. Trail widths would vary from two to eight feet. The project's intent is to bring a balance of recreation, adventure, and tranquility to the area. The new trails would be divided into four different segments based on their location and intended purpose. These lengths are an estimate and include the following: Front-Country Trails, Destination Trails, Oak Woodland Trails, and Park Trails.

The proposed project would include various amenities and features within the trail system. These are anticipated to include the following if possible: Shaded benches, scenic viewpoints, restrooms with drinking fountains, ecological restoration areas, educational signage, pet facilities (i.e., waste bags and waterspouts), Americans with Disabilities Act (ADA) accessible routes, bike racks, repair, and wash station, isolated meditation areas, swing benches, large gathering spaces with table seating, exercise stations, outdoor classroom, bike jumps, bird blinds, hitching posts, parking, and conservation zones.

Caltrans has the following comments:

Environmental

If there are any construction related activities that will encroach into Caltrans Right of Way (ROW) as a result of the project, the project proponent must apply for an Encroachment Permit with the Caltrans District 10 Encroachment Permit Office.

- All California Environmental Quality Act (CEQA) documentation, with supporting technical studies, must be submitted with the Encroachment Permit Application. These studies may include an analysis of potential impacts to any cultural sites, historic properties, biological resources, hazardous waste/materials, scenic highways, and/or other environmental resources within Caltrans Right of Way, at the project site(s). Evidence of consultation with local Native American tribes and interested parties will need to be presented within the technical documents for approval of encroachment in the Caltrans ROW. If any previously unknown cultural resources are discovered during construction in Caltrans ROW, all work must stop within a 100-foot radius of the discovery. The Caltrans D10 Environmental Office must be notified immediately. The Caltrans Professionally Qualified Staff (PQS) will investigate the discovery. No work shall resume within the 100-foot radius until authorized by the Caltrans PQS.
- Mitigation Measures BIO-7 in the Initial Study identifies the nesting season as February 1 to August 15; however, Caltrans considers the nesting season to be February 1 to September 30. There are mature trees within and/or near Caltrans ROW that could provide suitable nesting habitat.
- If work will occur between February 1 and September 30 of any year, a pre-construction bird survey must be conducted by a qualified biologist prior to the start of any construction related activities in Caltrans ROW.
- If an active nest is observed, a protective buffer must be established around the nest per California Department of Forestry and Wildlife (CDFW) guidelines. No work is allowed within the protective buffer limits until the young have fledged and until authorized by the Caltrans District 10 Environmental Office. Results of the pre-construction bird survey(s) must be provided to the Caltrans District 10 Environmental Office prior to the start of construction.
- If there are impacts to water resources within Caltrans ROW, Caltrans will need to review the correspondence with the permitting authorities (California

Department of Fish and Wildlife [CDFW], United States Army Corps of Engineers (USACE, Regional Water Quality Control Board(RWQCB) and/or be provided copies of any required permits prior to the start of any construction in Caltrans ROW.

- If there are impacts to any special status species, critical habitat, or Essential Fish Habitat that exist within Caltrans ROW, evidence of consultation with CDFW, U.S. Fish & Wildlife Service, (USFWS) and/or National Marine Fisheries Service (NMFS) shall be provided to Caltrans with the Encroachment Permit application.

Active Transportation

- Caltrans supports the installation of transportation facilities that reduce levels of traffic stress (LTS) for pedestrians and bicyclists in communities. These transportation facilities lessen safety/collision risks with motor vehicles by providing separate route alternatives that are protected rather than having to ride and walk on roads with motorized traffic, while also fills gaps in local and regional active transportation networks.
- Caltrans supports project efforts that incentivize exercise and environmental stewardship by encouraging mode shifts from short-distance motor vehicle trips to walking and bicycling. These efforts provide transportation choices in communities beyond depending on resource-intensive single occupancy vehicles (SOV's).

Travel Forecasting

- In Section 4.17.2 Impact Analysis on page 4-66 and 4-67 there is no map provided indicating the locations of the parking areas for trail users wanting to get to the trails via automobiles.
    - Please provide maps referencing the locations of the parking areas for users to the trails using automobiles, including the relationship to the circulation system and the state route system.
- In Section 4.17.2 (b) on page 4-67, Appendix A is referenced with the statement, "Furthermore, during operation, the Project is estimated to generate approximately 45 vehicle trips per day on weekends and 9 vehicle trips per day on weekdays." No sources were cited for these trip generation estimates. One does not know how these trip estimates were derived from reading this document (including the appendices).
    - Please provide cited sources for the trip generation estimates stated in this section.

- In Section 4.17.2 (d) on page 4-67, "The Project would not substantially increase traffic delay on nearby roadways." This statement isn't substantiated by any quantitative analysis or qualitative evaluation.
    - Please substantiate this statement by providing the quantitative analysis and/or qualitative evaluation.

All future development for the project will require further review by Caltrans.

If you have any questions or would like to discuss these comments, please contact Lloyd Clark at (209) 986-9802 (Email: Lloyd.Clark@dot.ca.gov), or me at (209) 639-8832 (Email: Gregoria.ponce@dot.ca.gov).

Sincerely,

Gregoria Ponce'

Gregoria Ponce'
Chief, Office of Rural Planning

c: State Clearinghouse