

South Coast 101 HOV Lanes Project

Santa Barbara County, California

05-SB-101-PM 1.4 to 12.3

05-0N7000 (ID# 0500000225)

SCH# 2009051018

**Final Environmental Impact Report/Environmental Assessment
with Finding of No Significant Impact**

Appendix M

Volume IV of IV



Prepared by the
State of California Department of Transportation

August 2014

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Volume IV contains Appendix M, which presents all of the comments received during the public review period for the South Coast 101 HOV Lanes Draft Environmental Impact Report/Environmental Assessment (draft environmental document) circulated from March 23, 2012 to July 9, 2012. It should be noted that the original deadline to receive public comment was May 25, 2012. However, based on requests from Santa Barbara County and California Coastal Commission, the comment period was extended to July 9, 2012.

Comments Received

Caltrans received comments from state agencies, local agencies, departments, public interest groups and other individuals. Written comments were submitted in the form of comment cards, emails and letters. Approximately 261 comments were submitted in either comment card or email format. In addition, a court reporter recorded the following: 11 oral comments expressed during the public hearing held for the project at the Montecito Country Club on April 24, 2012, and one comment expressed during the public hearing held for the project at Carpinteria High School on April 25, 2012. Refer to Volume 1, Chapter 4 (Comments and Coordination) for additional details on the public hearings.

Some of the comments received expressed approval of a specific alternative or interchange configuration for Cabrillo Boulevard/Hot Springs, while others expressed concerns about:

- Noise (requests for more soundwalls)
- Traffic circulation (including bicycle and pedestrian)
- Aesthetics
- Interchange design—retain left-side ramps
- Coastal resources

Caltrans Responses

In this appendix, a Caltrans response follows each comment letter, email, comment card and court reporter transcript entry. Responses are numbered to correspond to the specific comment or question presented. Comments and responses are presented in the order stated in the following tables:

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Appendix M • Response to Comments

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California Transportation Commission	Andre Boutros	45
Native American Heritage Commission	Dave Singleton	47

Local Government Agencies	Contact	Comment / Response-pg. #
City of Carpinteria	Mayor Al Clark	53
City of Santa Barbara-Community Development Department	Paul Casey	66
City of Santa Barbara-Planning Commission	John Campanella	97
County of Santa Barbara	Chandra L. Wallar	100
County of Santa Barbara Fire Department	Eric Peterson	142
Santa Barbara County Air Pollution Control District	Carly Wilburton	143
Santa Barbara County Historic Landmarks Advisory Commission	John C. Woodward	145
Montecito Sanitary District	C. Michael McCaleb (Court Reporter Transcribed - Carpinteria)	631

Non-Profit Organizations and Businesses	Contact	Comment / Response-pg. #
Archbald & Spray LLP, Attorneys at Law	Douglas B. Large	153
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Carpinteria Beautiful	Jim Taylor	188
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Four Seasons Resort	Ms. K. L. Earp	190
Law Office of Marc Chytilo	Marc Chytilo	191
COAST-Coalition for Sustainable Transportation	Mark Bradley	198
The Cottages of Summerland Owners' Association	Robert Sizlo (President)	202
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Las Aves Business Complex	Linda Sanders Robertson	228
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Morehart Land Co.	Madeleine Mueller	254
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Price Postel & Parma LLP	Sam Zodeh	258
Sage Associates	Orrin and Cindy Sage	260
Santa Barbara Audubon Society	Lee Moldaver	263
Santa Claus Lane Business Association	Christine Boyd	268
Save Our Village	June Pujo - Pujo & Associates	270
Save Our Village	J'Amy Brown/Martha Siegel - SOV Steering Committee	325
Summerland Citizens Association	Board of Directors	276
Ty Warner Hotels and Resorts	William Medel	280
Villa De Montecito Homeowners Association	Sam Kaiser	283

<i>Public Individuals</i>	<i>Response- page. #</i>	<i>Alternative - Configuration Selection</i>
Abatemarco, Frank	287	No Configuration
Able, Nell	288	-
Adizes, Ichak & Nurit Manne.	289	-
Ahn, Michael	291	-
Alexander, Lynne	292	-
Antonini, Robert (2 Letters)	294	-
Argyropoulos, Tina & Elias	296	Alt 1/F Mod
Armstrong, Michelle	298	F-Mod
Atkinson, Cathy	299	No Build/F Mod
Atkinson, David	301	No Build/F Mod
Ayres, Larry (2 Letters)	303	-
Badat, Randall	306	-
Barrack, Tom & Laurel	310	No Build
Bergman, Arlene	312	Alt 1/F Mod
Berwick, Keith & Sheena	314	F Mod
Boehr, Juergen	315	-
Bollay, Thomas	316	-
Bradley, Doug	320	-
Brant, Maria	321	-
Bromfield, Ann	322	F Mod
Bronstein, Ann	324	-
Brown, J'Amy	325	F Mod
Buergey, Candice (2 Letters)	330	-
Burke, Jeffery T.	338	-
Calhoun, Tony	340	-
Campbell, Rondi	341	-
Carleton, Luba	342	-

<i>Public Individuals</i>	<i>Response- page. #</i>	<i>Alternative - Configuration Selection</i>
Carmody, Jeffery S.	343	-
Chierici, Alan H	345	-
Collins, Gaemus	346	-
Comperatore, Ryan	347	-
Conger, Ken	349	-
Crandell, Michael	350	-
Cruz, Antonio	351	-
Deeley, Michael & Ruth	352	F Mod
DeGiacomi, Christie (3 Letters)	353	Alt 1
Dickey, Mrs. K	356	-
Dickinson, Rufus	357	-
Didier, Paul	358	-
Dolan, Diana	360	Alt 1
Engs, Edward	361	-
Fisher, Dana	363	-
Foreman, Tia	364	-
Frampton, George & Sue	365	-
Frost, Eleanor	366	-
Frost, Everett	368	-
Frost, Owen	372	-
Gale, Tina & Bob	375	F Mod
Garner & Hess	376	-
Giles, Diane	377	-
Gillard, Stuart	379	No Configuration
Grassini, Kathleen M.	380	-
Grassini, Lawrence P.	383	-
Grassini, Sharon	385	-

<i>Public Individuals</i>	<i>Response- page. #</i>	<i>Alternative - Configuration Selection</i>
Gray, Louise	387	-
Greenhouse, Patrice	388	-
Handloser, Diane	390	Alt 1/F Mod
Handloser Jr., John S.	393	Alt 1/F Mod
Hardisty, Johnny	397	-
Haselton, Toni	398	F Mod
Haslem, James R.	400	-
Hayes, Robert G.	401	F Mod
Hayes, Robert M.	403	F Mod
Hoffman, Valerie J.	405	-
Hogan, Phillip & Elizabeth	408	-
Jacobson, Doralee S.	410	Alt 1
James, Ann	411	F Mod
Johnson, Steve	412	-
Jones, Beth	415	-
Kavanagh, John & Caroline	416	-
Keller, Susan	417	F Mod
Kelley PhD, Kalon (2 Letters)	420	-
Kerns, Jeff	423	F Mod
King, Ana Marie	424	Alt 1/F Mod
King, Steve	425	-
Kuczmariski, Susan Smith	426	-
Ladin, Doreen	427	-
Leader, Patrick	429	-
Levine, Dr. Estes Potter	430	No Build
Lewis, Peter & Naila	431	-
Linowski, Eva (2 Letters)	432	F Mod

<i>Public Individuals</i>	<i>Response- page. #</i>	<i>Alternative - Configuration Selection</i>
MacKenzie, Bruce	434	-
Mackey, Juliette	435	-
Mahboob, Ray	436	-
Manuras, Harry	437	-
Marcin, Jane	438	-
Masuda, Ken	443	-
McClain, Ron & Barbara	444	-
McGowan, Edo	446	-
McLaughlin, Ed	483	Alt 1
Michal III, John A.	484	-
Mikeska, Jeff	486	No Build
Mortensen, Finn	487	Alt 1/F Mod
MT General Contractor	489	-
Murdoch, Joan	492	F Mod
Naughton, Tara	493	-
Nichols, Wade & Brenda	494	F Mod
Noe, Ron (via Valerie Hoffman)	495	-
Ouweland, Terre	498	-
Overall, Jack	499	-
Owens, Sandra	501	-
Paola, Jon	502	-
Perry-Thompson, Patricia & McColm, Robert C.	503	-
Pettit, Thomas	504	-
Phillips, Kimberly	505	F Mod
Randolph, Deirdre	506	-
Reingold, Robert B.	511	-
Reisenbach, Gayle & Sandy	512	-

<i>Public Individuals</i>	<i>Response- page. #</i>	<i>Alternative - Configuration Selection</i>
Requejo, Julia	514	-
Requejo, Ricardo & Julia	515	-
Richards, Kent & Debbie	518	-
Rosen, Sybil	519	F Mod
Rowan, Dave	520	-
Ruhge, Justin M.	521	Alt 1
Russell, Bruce & Oakley, Andrew	523	Alt 1/F Mod
Saiki, Kevin	526	-
Sapienza, Cindy & Joe	527	F Mod
Scarminach, Brian	529	-
Schall, Maryan	530	-
Schmerzler, Lorraine	531	-
Schwartz, Mark (2 Letters)	532	-
Sharp, Harriet	536	F Mod
Shelton, Jan	537	-
Siegel, Martha	539	F Mod
Siriannai, Judy & Kowalski, Margo	540	-
Smilgis, Martha	541	-
Smith, Brian & Janet	543	F Mod
Smith, Denise	544	-
Storm, Erica	545	No Build
Thomas Jr., William S.	546	-
Tsutsumida, Karen S.	547	-
Tsutsumida, Pat	552	-
Tucker, Ken	557	-
Tumamait, Patrick	560	-
Van Oosten, Elinor	561	-

<i>Public Individuals</i>	<i>Response- page. #</i>	<i>Alternative - Configuration Selection</i>
Van Vliet, Kathryn & Alan	562	-
Vassallo, Jerry	565	-
Viens, Joseph	566	-
Vizcarra, Henry & Freda	567	F Mod
Warner, Nina	568	F Mod
Wax, Susan M.	569	F Mod
Weckstrom, Andre P.	570	F Mod
Weckstrom, Andre & Beverly	571	F Mod
Whitney, Blair & Heidi (two letters)	572	F Mod
Winter, JoAnn	576	-
Wyss, John & Dana	577	-
Zoradi, Mike & Malde, Susan	578	F Mod

<i>Public Individuals</i>	<i>Response- pg. #</i>	<i>Alternative - Configuration Selection</i>
<i>The following individuals only selected an Alternative and/or Configuration</i>		
Allen, Ricky	581	F Mod
Becker, Gary & Mary	581	F Mod
Boehr, Juergen	582	F Mod
Bonoff, Karla	582	F Mod
Burford, Jerrad	583	F Mod
Carroll, Serena	583	F Mod
Carson, Dr Lillian & Hurst, Sam	584	F Mod
Chen, Jie (2 Letters)	584	F Mod
Cherner, Stephen	585	F Mod
Davy, Lorien	586	No Build
Decker, Martha	586	F Mod
Didier, Paul	587	F Mod
Dillon, Victoria	587	F Mod
Duffey, Louise A.	588	F Mod
Elwell, Jim	588	F and M
Epstein, Ira	589	F Mod
Evans, Louise	589	F Mod
Even-Ohlgren	590	F Mod
Gaeden, Fred	590	F Mod
Gillard, Stuart & Marilyn	591	F Mod
Gura, Jon	591	F Mod
Gura, Kate	592	F Mod
Hacken, Mark & Barbara	593	F Mod
Handloser, Diane	593	F Mod
Handloser, John	594	F Mod

<i>Public Individuals</i>	<i>Response- pg. #</i>	<i>Alternative - Configuration Selection</i>
<i>The following individuals only selected an Alternative and/or Configuration</i>		
Harding, Tim	594	F Mod
Harding, Tim & Fox, S. Dorothy (2 Letters)	595	F Mod
Hatch, Deanna	596	F Mod
Hickman, Darryl	596	F Mod
Hickman, Lynda	597	F Mod
Hotchkis, Preston B.	598	F Mod
Ingersoll, Bob	598	F Mod
Keith, Robert & Kathleen	599	F Mod
Kitnick, Barry A.	599	Alt 1/F Mod
Kitnick, Barry A. & Jill A.	600	Alt 1/F Mod
Knust, Lisa & Peer (2 Letters)	600	F Mod
Knust, Lisa	601	F Mod
Kommerstad-Reiche, Carol M.	602	F Mod
Korchinski, William J. & Withers M.D., Cynthia	602	F Mod
Lester, Lucinda	603	F Mod
Lingham, Carol & Lassen, Eric	603	F Mod
Lundberg, Cliff & Diane	604	F Mod
Mabon, Stuart	604	F Mod
MacCorkle, Jeff	605	F Mod
Machalleck, Dana & Dale	605	Alt 1/F Mod
Marble, Calvin D.	606	F Mod
McClintock Jr., James T.	606	F Mod
Michael, Sydney	607	F Mod
Ornstein, Robert M.	607	F Mod

<i>Public Individuals</i>	<i>Response- pg. #</i>	<i>Alternative - Configuration Selection</i>
<i>The following individuals only selected an Alternative and/or Configuration</i>		
Owen, Walter	608	F Mod
Peterson, David L.	608	F Mod
Peterson, Kathleen	609	F Mod
Richardson -Schuyler, June	610	F Mod
Robertson, Linda	610	F Mod
Robertson, N. Thorn (2 Letters)	611	Alt 1/F Mod
Ronson, Kristine	612	F Mod
Rosen, Sybil	612	F Mod
Schwartz, Leonard	613	F Mod
Schwartz, Naomi	614	F Mod
Shafer, Ph. D., Robert	615	F Mod
Sickafoose, Jeanie & Ron	615	F Mod
Sickafoose, Ron	616	F Mod
Sokol, Erwin & Caren	616	F Mod
Templeton, Andrew	617	F Mod
Templeton, Tamara	617	F Mod
Teufel, Julie	618	F Mod
Tillotson, Frank	618	No Build
Tipple, Edith	619	F Mod
Tomson, Carla	619	F Mod
Van de Pas, Lu Anne	620	F Mod
Van Horne, David	620	F Mod
Venable, John & Christy	621	F Mod
Warren, Don L.	621	Alt 3

<i>Public Individuals</i>	<i>Response- pg. #</i>	<i>Alternative - Configuration Selection</i>
<i>The following individuals only selected an Alternative and/or Configuration</i>		
Weckstrom, Beverly	622	F Mod
Wells, Joan	623	F Mod
Westen, Beth & Derek	623	F Mod

<i>Court Reporter Transcript of Comments</i>	<i>Response-pg. #</i>	<i>Alternative - Configuration Selection</i>
<i>Montecito Meeting 4/24/12</i>		
Schmerzler, Lorraine	630	-
Peterson, Kay & Dave	631	F Modified
Badat, Randall	632	-
Schleck, Tom	632	-
McCaleb, C. Michael	633	-
Stern, Ted	634	F Modified
Colin, Jay Barry	634	-
Springall, Pam	635	-
Viens, Joseph	635	-
Mitchel, Glen	637	-
Wicks, Floyd & Diana	638	-
<i>Carpenteria Meeting 4/25/12</i>		
St. James, Kathleen	647	-

State Agencies

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EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

July 10, 2012

Yvonne Hoffmann
California Department of Transportation, District 5
50 Higueroa Street
San Luis Obispo, CA 93401

Subject: South Coast 101 HOV Lanes Project
SCH#: 2009051018

Dear Yvonne Hoffmann:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on July 9, 2012, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH# 2009051018
Project Title South Coast 101 HOV Lanes Project
Lead Agency Caltrans #5

Type EIR Draft EIR
Description Note: Review Extended

Caltrans proposes to widen U.S. 101 as necessary to provide a part-time, continuous access HOV lane in each direction on U.S. 101 extending from Carpinteria Creek in the City of Carpinteria to Cabrillo Boulevard in the City of Santa Barbara. The project begins 0.22 mile south of the Ballard Avenue overcrossing (post mile 1.4) in the City of Carpinteria and extends to the southern portion of the City of Santa Barbara (post mile 12.3) near Sycamore Creek.

Lead Agency Contact

Name	Yvonne Hoffmann		
Agency	California Department of Transportation, District 5		
Phone	805 542 4759	Fax	
Email	matt_c_fowler@dot.ca.gov		
Address	50 Higueroa Street		
City	San Luis Obispo	State	CA Zip 93401

Project Location

County	Santa Barbara		
City	Carpinteria, Santa Barbara		
Region			
Lat / Long			
Cross Streets			
Parcel No.			
Township	Range	Section	Base

Proximity to:


Highways	
Airports	
Railways	
Waterways	
Schools	
Land Use	Transportation Corridor

Project Issues Archaeologic-Historic; Noise; Biological Resources; Wetland/Riparian; Other Issues; Traffic/Circulation; Aesthetic/Visual; Air Quality; Coastal Zone; Flood Plain/Flooding; Geologic/Seismic; Recreation/Parks; Toxic/Hazardous; Water Quality; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; California Coastal Commission; Department of Fish and Game; Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Air Resources Board; Transportation Projects; Regional Water Quality Control Board; Region 3; Native American Heritage Commission

Date Received 03/23/2012 Start of Review 03/23/2012 End of Review 07/09/2012


Note: Blanks in data fields result from insufficient information provided by lead agency.



STATE OF CALIFORNIA

GOVERNOR'S OFFICE of PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT



EDMUND G. BROWN JR.
GOVERNOR

KEN ALICE
DIRECTOR

May 8, 2012

Yvonne Hoffmann
California Department of Transportation, District 5
50 Higueroa Street
San Luis Obispo, CA 93401

Subject: South Coast 101 HOV Lanes Project
SCH#: 2009051018

Dear Yvonne Hoffmann:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on May 7, 2012, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.


Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,




Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov


Document Details Report
State Clearinghouse Data Base



STATE OF CALIFORNIA

GOVERNOR'S OFFICE of PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT



EDMUND G. BROWN JR.
GOVERNOR

KEN ALICE
DIRECTOR

SCH# 2009051018 **Project Title** South Coast 101 HOV Lanes Project
Lead Agency Caltrans

Type EIR **Draft EIR**

Description Caltrans proposes to widen U.S. 101 as necessary to provide a part-time, continuous access HOV lane in each direction on U.S. 101 extending from Carpinteria Creek in the City of Carpinteria to Cabrillo Boulevard in the City of Santa Barbara. The project begins 0.22 mile south of the Bailard Avenue overcrossing (post mile 1.4) in the City of Carpinteria and extends to the southern portion of the City of Santa Barbara (post mile 12.3) near Sycamore Creek.

Lead Agency Contact

Name	Yvonne Hoffmann		
Agency	California Department of Transportation, District 5		
Phone	805 542 4758	Fax	
email	matt_c_lowler@dot.ca.gov		
Address	50 Higueroa Street		
City	San Luis Obispo	State	CA Zip 93401

Project Location

County	Santa Barbara		
City	Carpinteria, Santa Barbara		
Region			
Lat / Long			
Cross Streets			
Parcel No.			
Township	Range	Section	Base

Proximity to:

Highways	
Airports	
Railways	
Waterways	
Schools	
Land Use	Transportation Corridor

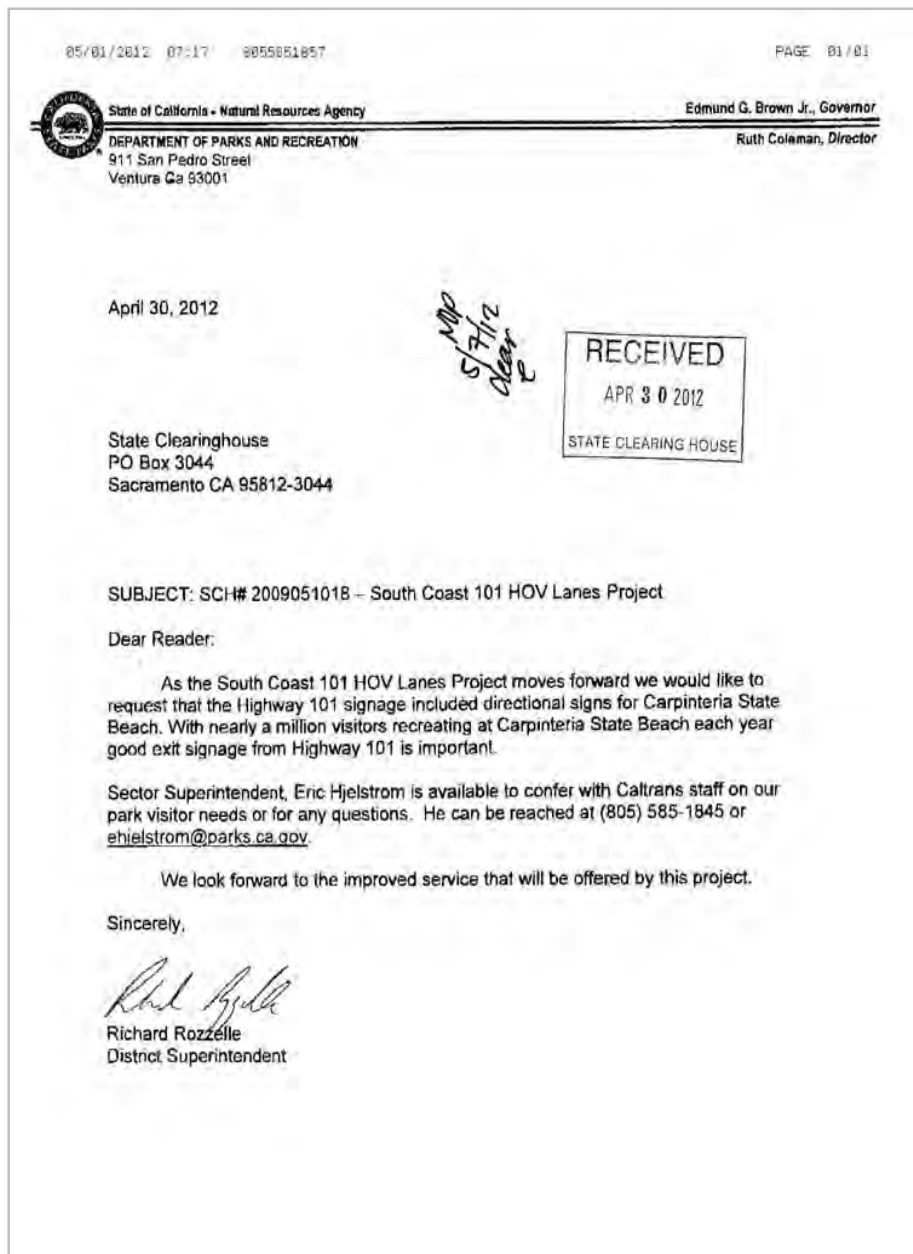
Project Issues Archaeologic-Historic; Noise; Biological Resources; Wetland/Riparian; Other Issues; Traffic/Circulation; Aesthetic/Visual; Air Quality; Coastal Zone; Flood Plain/Flooding; Geologic/Seismic; Recreation/Parks; Toxic/Hazardous; Water Quality; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; California Coastal Commission; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Air Resources Board; Transportation Projects; Regional Water Quality Control Board, Region 3; Native American Heritage Commission

Date Received 03/23/2012 **Start of Review** 03/23/2012 **End of Review** 05/07/2012

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Note: Blanks in data fields result from insufficient information provided by lead agency.



California State Parks

Comment 1 Parks and Recreation Signage

There is already guiding signage in both the northbound and southbound sections of U.S. 101 that directs people to the appropriate off-ramp for Carpinteria Beach. Any additional signage requests need to be made to the Caltrans Operational Signage Division.

CALIFORNIA COASTAL COMMISSION

SOUTH CENTRAL COAST AREA
1 SOUTH CALIFORNIA ST., SUITE 200
SANTA BARBARA, CA 93101
(805) 565-1800



July 9, 2012

Matt Fowler, Senior Environmental Planner
Environmental Analysis
California Department of Transportation
50 Higuera Street
San Luis Obispo, CA 93401

RE: Draft Environmental Impact Report/Environmental Assessment for the South Coast
101 HOV Lanes Project (SCH #2009051018)

Dear Mr. Fowler:

Commission staff has reviewed the Draft Environmental Impact Report/Environmental Assessment ("DEIR") for the South Coast 101 High Occupancy Vehicle Lanes Project, dated March 2012, and appreciates this opportunity to provide our input. Caltrans proposes to modify U.S. 101 in order to provide a part-time, continuous access HOV lane in each direction on U.S. 101 extending from 0.22 miles south of the Bailard Avenue overcrossing (post mile 1.4) in the City of Carpinteria and extends to the southern portion of the City of Santa Barbara (post mile 12.3) near Sycamore Creek. Three build alternatives and a no-build alternative were evaluated in the DEIR. Each build alternative would add a part-time single high-occupancy-vehicle lane in both the northbound and southbound directions and rebuild interchanges at Sheffield Drive and Cabrillo Boulevard/Hot Springs Road were existing ramps are currently located in the median. Five configurations were analyzed for the Cabrillo Boulevard Interchange. Alternative 1 proposes to widen to the median in some locations and widen to the outside in other locations to balance resource impacts. Alternative 2 proposes widening to the outside to maximize available areas for median landscaping. Alternative 3 proposes to widen to the inside, which means building all new paved lanes in the existing available median. The project is proposed to be constructed in segments over a period of 10 years.

As you further develop your environmental review of this proposed project, please consider our comments below.

Section 1.4 Permits and Approvals Needed

Table 1.4, Permits and Approval Required, for the proposed project, lists the necessary permits and approvals Caltrans plans to obtain from local governments and resource agencies (p.31); however, this table omits reference to necessity for the local governments to submit Local Coastal Plan Amendments ("LCPA") to the Coastal Commission for the subject project as currently designed. As further described below, it appears that, for all project alternatives except the "no build" alternative, a LCPA would be necessary for both the County of Santa Barbara's LCP and the City of Carpinteria's LCP because of inconsistencies with a number of program provisions, including wetland,

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Page 2

buffer, and scenic resource policies. More careful analysis is needed to determine whether any amendments to the City of Santa Barbara's LCP may be required.

Sections 2.1.1.2 Consistency with State, Regional and Local Plans and 2.1.1.3 Coastal Zone

Policy Consistency Analysis

The DEIR correctly notes that Coastal Development Permits (CDPs) will need to be obtained from the City of Santa Barbara, the County of Santa Barbara, and the City of Carpinteria. However, the DEIR lacks a comprehensive listing or analysis of LCP policies that will apply to the project. Further, there is no explanation that the Local Coastal Programs—together with the Coastal Act public access and recreation policies—constitute the project-level standard of review, nor that each LCP is comprised of both a Land Use Plan and implementing zoning ordinances. The DEIR notes that the project could potentially conflict with visual resource policies and wetland policies of the applicable LCPs (p.52). However, the DEIR also states, without analysis, that "the proposed build alternatives for the project are consistent with the associated federal, state, and local plans" (p.52). The project must ultimately conform to Coastal Act and LCP policies in order to obtain the necessary CDPs. Commission staff recommends that the environmental document include a comprehensive analysis of consistency of the project with the pertinent policies of the Coastal Act and with the existing policies of the certified LCPs of the County of Santa Barbara, City of Santa Barbara, and the City of Carpinteria.

Both the Coastal Act and CEQA are intended to help in making informed decisions about development and land use. While the compilation of a CDP-standards table is not required by CEQA, we recognize that this is the critical stage of Caltrans's environmental documentation that will be relied upon for all future regulatory reviews and therefore urge you to use this process to more carefully explain how project design, avoidance measures, impact minimization, and mitigation measures will collectively address both CEQA and Coastal Act requirements. As such, a complete LCP and Coastal Act policy evaluation can serve as an important guidepost for Caltrans to ensure that the project is meeting the necessary coastal permitting requirements and thereby streamline future reviews. Table 2.2, Potential Policy Inconsistencies, (p.50) does not contain a complete or thorough analysis of Coastal Act and LCP policies. Furthermore this table does not contain a complete assessment of potential policy inconsistencies. For example, potential impacts due to proposed sound walls are not included in the visual analysis. Thus, a revised table that contains all the applicable policies and that is supported by a thorough analysis of the proposed project's consistency with those policies is recommended.

Similarly, the DEIR provides an incomplete analysis of LCP standards in Section 2.1.1.2. For example, the DEIR states that "the project would enhance access to coastal resources by improving vehicular circulation within the U.S. 101 corridor" (p.47). The DEIR also provides an unsupported statement that the project "is consistent with policies that call for protecting coastal access to coastal areas" (p.52). A complete analysis of how the project enhances access to coastal resources for all modes of travel will be essential for meeting subsequent LCP amendment and CDP requirements.

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While we note that a degree of congestion relief is expected as a result of the proposed HOV lanes, thereby improving the recreational driving experience, these advantages will likely be offset over time through continued growth in automotive traffic volumes. More importantly, as discussed in greater detail below, the project lacks inclusion of key motorized and non-motorized multi-user transportation network connections for meeting the corridor's demands, especially relative to the California Coastal Trail, that would enhance access to coastal resources along the length of the overall HOV project.

4

The DEIR correctly states that the project "would potentially conflict with wetland setbacks identified in several coastal policies" (p.48). The DEIR should more thoroughly explain the pertinent policy requirements, discuss how the project has been designed to avoid and minimize impacts/policy inconsistencies, and then address the nature of the remaining unavoidable wetland impacts, including a description of the conflicts with wetland policies. Similar evaluations should be developed for any other LCP and Coastal Act policy conflicts that may be identified in the analysis recommended above. For example, the DEIR states that the project "would also potentially conflict with buffers set from streams or top-of-bank in riparian areas identified in several coastal plans" (p.48). The DEIR should thoroughly explain all applicable LCP and Coastal Act policy requirements, discuss design features that avoid and minimize impacts/policy inconsistencies, and address the nature of the remaining, unavoidable impacts, and associated policy conflicts. In addition, this discussion would benefit from clearly linking Caltrans's proposed mitigation strategies to each of the impacts identified.

5

LCP Amendment Implications

While Section 1.4 Permits and Approvals Needed omits listing the amendments to affected Local Coastal Programs that will be necessary for the project to gain approval from the State's coastal resource management program, the DEIR elsewhere states that, before issuance of a permit can occur, an amendment to the Local Coastal Plan for the City of Carpinteria and Santa Barbara County would be required because of conflicts with wetland policies. However, the DEIR continues that "the amendment would narrowly define wetlands affected by the project and that only those wetlands would be included in the amendment. Therefore, no impacts other than those identified in this document would occur" (p.49). This statement provides an incomplete characterization of what will likely be needed for approval of an LCPA for this project.

6

As noted in the DEIR, but not sufficiently analyzed, the proposed HOV Project raises conflicts with resource protection policies of the applicable LCPs, including but not limited to policies related to wetlands, visual resources, community character, coastal access, and potentially environmentally sensitive habitat area. Generally, such policy inconsistencies would not allow for approval of either an LCPA or coastal development permit. However, in some exceptional circumstances, the Coastal Act (see Sections 30200 and 30007.5) does provide the Coastal Commission a mechanism for dealing with a proposal that presents unavoidable policy conflicts. This resolution mechanism is available only if the Coastal Act Section 3 resource-protection policy conflicts are inherent in the essential nature of the project itself. If the Commission determines that policy conflicts legitimately arise out of the essential nature of a proposal, then they must resolve the policy conflict in a manner that is on balance most protective of significant coastal resources. In reaching this conclusion, the Commission must also

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determine that there are no alternatives that would avoid or minimize the project's adverse impacts on coastal resources and that maximum feasible mitigation has been included. Relative to the LCPA considerations, we note that any such amendments for the HOV project will need to demonstrate substantial benefits to coastal resources and public access, as well as full mitigation for unavoidable impacts to coastal resources in order for the Commission to find consistency with Coastal Act policies.

Further, given the particular facts of this case, it is imperative that inherent public coastal access and recreation benefits of the project be extraordinarily clear and compelling to render an amendment to the applicable LCPs approvable. This public access analysis should articulate the current and anticipated local and regional coastal access linkages and circulation for all modes of travel for various user groups relative to all HOV projects throughout the Santa Barbara City-to-Ventura County corridor. It is critically important for any LCPA proposal to incorporate a complete analysis of how the project will comply with the public access policies of the Coastal Act. We recommend that careful consideration be given to insuring a functioning multi-modal transportation network through this corridor, to closing critical gaps in bike and pedestrian pathways and transit support needs and making high priority improvements in the CCT system that services coastal access through the City of Carpinteria, City of Santa Barbara, and Santa Barbara County.

One opportunity for securing a key coastal trail linkage is the "Carpinteria Rincon Trail" that would extend from the eastern end of Carpinteria Avenue in the City of Carpinteria to Rincon Beach County Park in Santa Barbara County and the Ventura County line. The City of Carpinteria has recently prepared a Draft Mitigated Negative Declaration for this project (June 7, 2012). The one-mile Rincon segment is considered high priority for implementation because the existing gap in the Carpinteria Coastal Vista Trail (CCVT) creates a significant constraint for bicyclists and pedestrians. As Caltrans is aware, a southern phase of this HOV project, from Mobile Pier/Beacon's beach to Rincon State Park, is under construction and will provide a separated bike and pedestrian pathway as part of the CCT. That segment cannot adequately function, however, without a safe connection that meets the CCT planning principals and allows for through bike and pedestrian travel into the City of Carpinteria and beyond. The Rincon segment planned by the City would service an area with high visitor activity, offering spectacular scenery and one of the best opportunities along the entire stretch of Santa Barbara coastline to view beaches, the Santa Barbara Channel Islands, marine life, and the Los Padres National Forest. Furthermore, the segment would link Carpinteria Bluffs Nature Preserve and Rincon County Park, both popular coastal destinations, and would also become part of the Pacific Coast Bikeway.

In addition, other regionally significant CCT segments should also be considered as part of the overall SB 101 HOV project, such as a Class I two-way multi-user trail segment that links the terminus of Santa Claus Lane to the terminus of Carpinteria Avenue along Carpinteria Salt Marsh. The trail would provide a direct coastal route to connect Santa Claus Lane Beach in Santa Barbara County to the City of Carpinteria Coastal Trail. Caltrans prepared a "Project Study Report" for such a project in 1997, noting that a trail in that alignment has been discussed by local governments since 1977. We believe an approvable design for such a bike and pedestrian facility is possible at this location between Highway 101 and the rail line within existing right of way. Accordingly, and as

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further noted elsewhere in these comments, the DEIR should describe the existing bike or multi-user trail connections throughout the project corridor and identify other areas where there are opportunities to ensure that coastal access is significantly enhanced from a regional perspective.

General Revisions Suggested for Sections 2.1.1.2 and 2.1.1.3

The DEIR refers to the Santa Barbara County Comprehensive Plan, the City of Santa Barbara General Plan, the City of Carpinteria General Plan, and the Community/Area Plans for Toro Canyon, Summerland, and Montecito and states that "the proposed project would not conflict with any land use policies in those plans" (p.47). It appears that the reference to "land use policies" has been confused with "land use designations" because the project will, as later noted beginning on page 48 of the DEIR, conflict with some of the land use policies of the applicable LCPs, such as those regarding wetlands.

We also note that the reference to Santa Barbara County Coastal Land Use Plan should be corrected to state Santa Barbara County Local Coastal Plan (p.52). A Local Coastal Plan (LCP) encompasses both a Land Use Plan (land use plan policies) component and an Implementation Plan (zoning code) component.

Section 1.3 Alternatives

Three "build" alternatives, as well as the no-build alternative, are identified in the DEIR. Again, following any LCP amendments necessary for the selected alternative to move forward through regulatory reviews, the proposed project will require three different Coastal Development Permits (CDPs): one each from the County of Santa Barbara, the City of Santa Barbara and the City of Carpinteria. Each of these CDP's will be appealable to the California Coastal Commission. The standard of review for each, whether at the local level or on appeal will be the same: the certified Local Coastal Program, as amended, together with the public access and recreation policies of the California Coastal Act.

Given these requirements, we recommend that one of the three alternatives be modified (or an additional alternative be developed) which specifically addresses the coastal policy issues presented by the project. We anticipate that this work can be accomplished through the finalization of the DEIR. The modified alternative should strive to be consistent with each applicable LCP/Coastal Act standard of review and should particularly consider those policies that call for maximizing public access opportunities, protecting scenic resources, minimizing energy conservation and vehicle miles traveled, supporting alternative transportation modes, meeting air quality requirements and concentrating development in those areas that can adequately accommodate it. In general, this modified alternative should demonstrate that it meets all modes of the public's need for effective and safe transportation, while protecting the public's interest in preserving coastal resources and providing public access.

Section 2.1.5 Traffic and Transportation/Pedestrian Bicycle Facilities

As described above, it is important that the DEIR explore opportunities for incorporating a coastal multi-user path and other multi-modal connections into the overall project in

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order to: meet all user needs in the corridor, assist in the relief of traffic congestion on Highway 101, and thereby cumulatively improve coastal access in the City of Carpinteria, City of Santa Barbara, and Santa Barbara County. This discussion should include references to existing segments of the braided CCT for both pedestrians and bikers along the corridor and discuss how the overall project will contribute to the completion of the trail consistent with City, County and state planning efforts. (Please see the State Coastal Conservancy's 2003 report, *Completing the Coastal Trail*, for background information on the design principals of the trail.)

Currently, the DEIR does not sufficiently describe or identify existing bike path connections in the South Coast 101 HOV Lane corridor. Although a general description of bikeway classifications is included, the DEIR does not identify a baseline of multi-user pathways in the project corridor, including identification of trail areas that could be completed, improved or connected and in terms of providing key facilities such as bus stops, commuter bicycle and automobile parking, trail heads, etc. to support all modes of travel. The DEIR states that, "in several locations within the project limits, bicycle and pedestrian improvements are desired by local agencies and have been included as part of circulation plans. Desired improvements include access structures to cross over or under the freeway. Although the HOV project would not include those new facilities as part of the scope of the HOV project, it would not preclude the facilities from being constructed as planned." (p.107). Please further discuss the circulation plans and describe how the overall project will actually provide needed improvements identified in those plans for all modes of travel.

Without adequate supporting evidence, the DEIR states that "construction of the overall six-lane facility will improve local vehicular travel and decrease local intersection delay within the corridor, which will enhance bicycle and pedestrian circulation at other locations as well" (p.400). A fuller description of bicycle circulation improvements and impacts is needed. How will local communities and pedestrian and bicycle users be impacted by diverted traffic during the anticipated ten years of construction? How will replacement of bridge structures at Arroyo Paredon (Parida), Toro Canyon, Romero, Oak, and San Ysidro creeks affect bike lane or coastal trail access? How will bicycle and pedestrian circulation be specifically improved at other locations?

Section 2.1.6 Visual/Aesthetics

Soundwalls

Section 30251 of the Coastal Act, and as incorporated into LCPs, requires development to be "sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural landforms, to be visually compatible with the character of the surrounding areas, and where feasible, to restore and enhance visual quality in visually degraded areas." It appears that the proposed soundwalls along several reaches of the project corridor would be inconsistent with this policy due to impacts to visual resources and impacts to community character. In particular, the 1,700 ft. long soundwall proposed along the south side of the freeway adjacent to Padaro Lane just west of Santa Claus Beach, proposed in Alternatives 1, 2, and 3, would likely not be consistent with applicable policies because it would block or partially block ocean views from along the freeway. Similarly, the soundwalls proposed along the north side

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of the freeway in Summerland in Alternatives 1, 2, and 3 would be inconsistent with visual resource policies because it would block or partially block ocean views from the small Summerland community. Given LCP policy direction, soundwalls in these locations should be eliminated from the project plans or reduced in size and scale (and/or potentially redesigned to include the use of clear panels) to the maximum extent possible. Moreover, attention should be given to ensuring that views from Highway 101 to the ocean in the Bailard Avenue region across the Bluffs Nature Preserve and Viola Fields open spaces, as well across the Carpinteria Salt Marsh, are not damaged as a result of this project. If such project modifications are not feasible, then we believe that the mitigation of the unavoidable visual impacts from soundwalls in the vicinity should include the possibility of removing the visual blight and blockage that results from Caltrans's debris storage and rock and asphalt crushing activities between Santa Claus Lane and Highway 101 in Carpinteria, immediately after the 101 exit to Padaro Lane.

Memorial Oaks

Coastal Act and applicable LCP policies seek to protect community character and visual resources. The Memorial Oak trees (31 individual trees of 71 remain) line a portion of the freeway within the "Padaro Unit" between Carpinteria and Summerland. (p.112) What type of oak trees are the Memorial Oaks? Are all of these trees proposed to be removed? What alternatives have been evaluated to retain these oak trees or what mitigation is proposed if they will be removed? What sort of replanting ratios are being considered and where are these new trees expected to be located? Will this new location support oak woodland habitat functions?

Section 2.1.7 Cultural Resources

The DEIR identifies at least nine prehistoric archeological resources within the Area of Potential Effects including one archeological site within the project limits (p.216). According to the DEIR, all of the project build alternatives would cause direct adverse effects one archeological site P-42-003943, "Via Real Redeposited Midden." What design alternatives were considered that would avoid impacts to this resource and why are they not being incorporated?

Section 2.2.2 Water Quality and Stormwater Runoff

The Coastal Act, Section 30231, states that "the biological productivity and the quality of coastal waters...shall be maintained and, where feasible, restored through...minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface waterflow...maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams."

From a water quality perspective, the greatest area of concern is the proposed project's potential permanent contribution to impervious surface area. Increase in impervious surface is directly proportional to higher runoff volumes and higher runoff velocities (hydromodification). Hydromodification can destabilize natural stream channels and impact water quality by increasing erosion and sedimentation. As the area of impervious surface increases, it becomes incrementally more difficult to dissipate,

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infiltrate or treat runoff. As a result, pollutants found in highway runoff are more likely to enter and degrade coastal waters and negatively impact wetland habitats and increase the risk of flooding. These pollutants commonly include:

- Sediment eroded from surrounding lands, highway embankments and cut slopes, and receiving streambeds and banks
- Nutrients from plant debris, organic soils, fertilizer, vehicle exhaust, emulsifiers and surfactants
- Pesticides
- Dissolved and particulate metals
- Trash

The DEIR contemplates the use of standard, statewide-preferred treatment BMPs (vegetated bio-strip/swales) without presenting supporting information that they would be effective on this project, including identification of areas where they may be located in order to perform properly.¹ A rigorous analysis of design, source control and treatment control BMPs in the context of the DEIR would better correspond with the guidance in the Department of Transportation Statewide Storm Water Management Plan.²

- The DEIR should evaluate an array of options for design, source control, and treatment BMPs for the project in a meaningful, analytical way. Site design BMPs should be prioritized over source control BMPs and source control BMPs should be prioritized over treatment BMPs. Finally, all opportunities should be taken to locate BMPs in the same watershed as the impact is expected to occur, prior to considering offsite BMPs.
- As envisioned in the DEIR, treatment BMPs would not be used unless they meet the maximum extent practicable standard. However, if site design BMPs are considered first, it may become easier to handle the volume of runoff in 'practicable' applications of source control or treatment BMPs.
- Design considerations, such as lane and shoulder width reduction, should be discussed in the DEIR as potential methods to reduce impervious surface area, polluted runoff, and hydromodification. Lane width reduction, or funneling down highway widths in specific areas (e.g. where runoff could directly enter a water course or municipal separate storm water sewer system) could also be effective to avoid wetlands or provide room to install high-priority BMPs. Collection systems for bridge deck runoff should be explored to avoid direct contribution of

¹ Amended Water Quality Assessment Report, January 2012, (PDF) p. 36/49 "The preliminary permanent storm water treatment BMP consideration strategy can be found in the July 2010 Project Planning and Design Guide (PPDG). That being, bio-filtration strips/swales will be considered above all other TBMPs."

² SWMP, May 2003, Table 4-3. Treatment Best Management Practices (BMPs) for Category B projects (where the Project Study Report is approved but the Environmental Document is not final) "will be evaluated and where feasible incorporated into a project's design and addressed in the environmental documents". Category A projects (where the Project Study Report is not yet approved), "storm water quality issues will be evaluated and treatment BMPs considered during the project alternatives and work plan development".

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highway bridge runoff to stream channels. Design configurations that would improve water quality should not be ruled out because they may require design exceptions.

- The Amended Water Quality Assessment Report (pdf p. 22) states that permanent treatment for nitrate-laden dry weather run-on should be to divert these flows to a sanitary sewer. This recommendation should be reflected in DEIR discussion of water quality and possibly incorporated as a design parameter.
- Permeable pavement should be considered as an alternative to conventional pavement wherever possible. Road shoulders and ramp gore areas would be good candidates for permeable pavement. In addition, the DEIR (p. 49) states that "The project proposes to install noise-attenuating pavement surface on all mainline lanes within the project limits." If alternative pavements would also reduce runoff and improve water quality, the DEIR should discuss the potential benefits of using such pavement.

The DEIR is inconsistent on the issue of whether or not the existing road surface would be addressed.³ And, neither the DEIR nor the Amended WQ Assessment Report quantifies how much pavement area already exists. The DEIR should discuss the State Water Resource Control Board's pending Statewide Storm Water Permit and whether or not each Alternative would trigger the "50% rule" – where the entire pavement surface would require treatment if more than 50% of the existing surface area is added by the project. In any event, after all design options to improve water quality have been incorporated, the entire road surface should be treated with source control or treatment BMPs to the maximum extent practicable. This approach would be consistent with the Coastal Act requirement to *restore water quality where feasible*. The DEIR should discuss how the project could feasibly contribute to restoring water quality by treating existing runoff from the highway, in addition to treating runoff from new pavement.

Polluted runoff and hydromodification may affect several major stream corridors crossed by the highway, and the impacts may be independently and/or cumulatively significant. The DEIR's conclusion that water quality impacts would be insignificant after mitigation for all of the project build alternatives is not persuasive. The DEIR asserts that the project will be designed to be invisible in the watershed (where appropriate).⁴ However, because no treatment BMPs are identified between PM 6.9 and PM 12.3, it is unclear how hydromodification and polluted road runoff in this project segment would be avoided. Off-site mitigation will not mitigate on-site impacts, and should be considered last, after all available onsite BMPs have been considered and rejected. Similarly, the

³ DEIR p. 247 states that "...100%...of the water quality flow from all impervious surfaces within this project will be the goal for treatment." However, the Mitigation Summary (p. F-6) states that "The preferred treatment best management practices would be vegetated biofiltration strip/swales. If these can be incorporated to treat 100 percent of the stormwater from the new impervious areas, no further treatment best management practices need be considered."

⁴ Amended Water Quality Assessment Report, January 2012, (PDF) p. 37/49 In theory, it should be one of the projects' goals to not change the geomorphologic processes of the stream and to keep the project as hydraulically invisible as possible. When a highway interferes with a meandering stream, inhibits the flow of floodwaters, and/or changes the hydrograph of the stream, the project is not invisible to the watershed.

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degree to which existing landscaping can be preserved for filtering runoff, maintaining sheet flow to vegetated areas, and removing lining from existing concrete drainage channels, although mentioned in the DEIR, is not quantified or analyzed in a meaningful way that demonstrates these practices would be effective on a project scale.

Romero Creek and San Ysidro Creek, for example, are both critical steelhead habitat. Storm water BMPs installed at Bailard Road that handles an equivalent area of impermeable road surface will not address the impact of untreated runoff and hydromodification in these creeks. Storm water BMPs installed at Bailard Road will only protect Carpinteria Creek, which is concrete lined and has no steelhead population. Providing for treatment of an equivalent volume of runoff at Bailard Road will not provide the same benefit as BMPs located at Romero or San Ysidro Creek.

Cumulative water quality impacts are not adequately addressed in the DEIR. The DEIR incorrectly states (p.418) that "if the proposed project would not result in a substantial direct or indirect impact to a resource, it would not contribute to a cumulative impact to that resource." Even a small impact to water quality in impaired waters would constitute a cumulative impact. The 303d list documents degraded water quality in many of the watersheds in the project area. In addition, these waters are arguably in declining health, and are at risk, even without the contribution of project impacts. Impacts of past projects, including runoff from the existing highway, impact the health, condition and status of these waters. Any additional impact on water quality should be assessed as a potential cumulative impact.

The DEIR does not present information to compare water quality impacts for each of the project alternatives. The DEIR should include an evaluation of the water quality impacts and mitigation specific to each alternative. The water quality analysis should assess the following topics:

- The impervious surface area that would be created for each alternative (e.g. alt 1 = 47 acres, alt 2 = 51 acres, alt 3 = 40 acres) relative to the existing impervious surface area of the project (e.g. 100 acres).
- The amount of flow estimated from each of these areas that could be infiltrated to directly address hydromodification impacts. Where infiltration is not possible, what other types of detention features could be used?
- The volume of flow that is estimated that could be treated in flow-through BMPs to address the introduction of pollutants to coastal waters for the 85th percentile intensity design storm. Based on Santa Barbara County standard conditions, the design volume should be equal to or greater than 0.4 inches.
- The spatial distribution of BMPs over the length of the project (e.g. there are no BMPs proposed between PM 6.9 and PM 12.3) and the ability to situate treatment BMPs to intercept and treat runoff prior to it reaching coastal waters. Can ROW be acquired to accommodate BMPs to treat/infiltrate runoff from PM 6.9 to 12.3? What non-pavement areas are potentially available for BMPs? Do tradeoffs need to be considered to prioritize the placement of BMPs to prevent direct discharge of highway runoff to creeks or wetlands?

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- Each stream channel receiving runoff from the project should be assessed for its potential susceptibility to hydromodification. The Amended Water Quality Assessment Report describes some of the general aspects of the channels (e.g. concrete-lined or gravel bed), but should supplement these evaluations to include a risk analysis for hydromodification for each channel such as is described in the Tentative Statewide Storm Water Permit dated April 27, 2012. Although this permit has not yet been adopted, it is referenced here as a potential source of information. These risk analyses should be used to prioritize where infiltration BMPs, detention features, or minimization of impermeable surfaces are most needed.
- The ability to intercept and infiltrate runoff prior to it reaching coastal waters. The document is inconsistent in the information presented describing groundwater hydrology and the ability to infiltrate runoff.⁵ It is not clear how hydromodification effects of the project would not have a significant impact, both individually and cumulatively, if no storm water can be infiltrated due to groundwater elevations or soil properties, and no water detention facilities are contemplated.

Section 2.2.6 Air Quality

Coastal Act policies call for locating new development in existing developed areas that can accommodate it (Public Resources Code Sec. 30250), conforming with air quality requirements (PRC Sec. 30253(3)), and conserving energy and minimizing vehicle miles traveled (PRC Sec. 30253(4)). The policies also state that new development projects should facilitate the provision of transit service, provide for non-automobile circulation, and provide for adequate parking or public transportation (PRC Sec. 30252). It is critical that the DEIR be expanded to fully evaluate the project proposal in light of these policy requirements.

The DEIR states: "In summary, when a highway is widened, the localized level of mobile source air toxics emissions for the build alternatives could be higher relative to the no-build condition, but this is expected to be offset by increases in speeds and reductions in congestion (which are associated with lower mobile source air toxics emissions)...However, on a regional basis, the Environmental Protection Agency's vehicle and fuel regulations, coupled with fleet turnover, would over time cause substantial reductions that, in almost all cases, would cause region wide mobile source air toxics levels to be significantly lower than today." (DEIR, p.281) Please evaluate alternatives that would incorporate non-motorized transportation, such as the trail connections described above, and thereby reduce emissions. Enhancement of non-automotive transportation modes should be considered as part of the optimum mix of measures that will achieve conformance with Coastal Act energy conservation and air quality policies.

⁵ DEIR p. 250 states that "Currently, infiltration devices are not proposed as part of the project due to high groundwater levels in most locations." However, the *Amended Water Quality Assessment Report* pdf p. 46/49 states "BMPs will be selected to minimize pollutant discharges to surface waters, minimize storm water discharge rates and volumes, and recharge groundwater (emphasis added)." and pdf p. 36 "The project will incorporate permanent storm water treatment BMP's that preserve the existing hydrology (emphasis added) to the maximum extent practical...."

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Section 2.3 Biological Environment

Coastal Act and LCP Standards

As already stated, in order to obtain a coastal development permit for the project, all development must conform to the policies of the applicable LCPs, and ultimately the Coastal Act, with regard to biological resources. Given that all alternatives contained in the DEIR contemplate some filling of wetlands for the expansion of Highway 101, critical policy inconsistencies are raised regarding provisions of Section 30233 of the Coastal Act (and with LCP standards that mirror this policy). In particular, these provisions allow wetland fill only for eight specified uses, and only then when there is no feasible less environmentally damaging alternative. The Commission previously has found that Coastal Act section 30233(a) constrains such fill allowances for limited expansion of roadbeds and bridges necessary to maintain existing traffic capacity. It is important to note that exception is expressly limited to expansions that maintain existing capacity. The proposed HOV improvements to the SB 101 HOV, with an additional lane in each direction, will increase the capacity of the roadway. Therefore, they do not qualify as incidental public services purposes under Section 30233(a).

The Commission's interpretation of the meaning of PRC section 30233 has also been upheld by the courts. (See *Bolsa Chica Land Trust v. Superior Court* (1999) 71 Cal.App.4th 493.) The *Bolsa Chica* case involved a roadway expansion project, and the court, in construing the "incidental public service purpose" exception, said that the exception cannot be extended by finding that a roadway expansion is permissible when, although it increases the vehicle capacity of a roadway, it is designed to maintain an existing level of traffic service.

As suggested above, it would be extremely beneficial to have the applicable LCP and Coastal Act policies listed in a table; it is especially important that the contemplated wetland impacts of the project be carefully analyzed in light of the applicable LCP policies. Further, the DEIR should characterize riparian habitat areas, creeks, and wetlands according to the standards and definitions listed in the applicable LCPs and Coastal Act differentiating between riparian habitat, creek areas, wetland habitat areas, as well as areas considered to be environmentally sensitive habitat area in each LCP.

The DEIR does not clearly differentiate between impacts to creeks versus impacts to riparian habitat. Further, the DEIR identifies some creek areas as wetlands. For example, according to the DEIR, unlined creek channels within the biological study area were delineated as Coastal Zone wetlands using the single-parameter wetland definition. These unlined creek channels (Arroyo Paredon, Romero, San Ysidro, Oak, Montecito, and portions of Toro Creek) were also considered as "other waters of the United States." (p.356) Additionally, Table 2.36 lists impacts to "other waters of the U.S" and shows temporary and permanent impacts at each creek location. Table 2.36 notes where unlined creek reaches in the biological study area are considered both "other waters" and coastal zone wetlands. (p.382) The DEIR should be revised to provide a table and narrative that differentiates between impacts to riparian vegetation at each creek versus impacts to the creek channel. Additionally, impacts to wetlands versus impacts to the creek bed should be distinguished. This data is necessary to evaluate

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impacts and determine appropriate mitigation ratios for each habitat type and affected area.

Table 2.33, Riparian Impacts, lists the number of tree species at each creek location to be impacted. (p.352) However, the DEIR does not quantify (in sq. ft. or acreage) the amount of riparian vegetation to be impacted at each creek, inclusive of all areas where the trees are located. Additionally, for each creek, please quantify all riparian areas that will be disturbed for placement of rock slope protection.

Further, the DEIR categorizes wetlands as different wetland types, including: "U.S. Army Corps of Engineers and Coastal Zone," "Additional Coastal Zone Wetlands," "Human-made drainage features," and "creeks." (p.361-383) The DEIR should include all wetlands that meet the Coastal single-indicator definition of wetland in one category for purposes of analysis to identify impacts. Additionally, the DEIR should make clear the plans for providing mitigation ratios of 4:1 for affected wetland areas that meet the Coastal Act definition.

Please include a table analyzing impacts or encroachments within wetland buffer versus impacts to the wetland itself.

The DEIR refers to the "Natural Environment Study" prepared for the project as the source for the delineation of wetlands (DEIR, p.356). The "Natural Environment Study" refers to the "Wetland Study" in Appendix G for the project for a more detailed discussion of the delineation methods. (Natural Environment Study, p.11) Appendix G does not contain the "Wetland Study" and states that, since the completion of the Wetland Study, Caltrans design alternatives have been updated, resulting in impacts calculations that differ from the values reported in the Wetland Study. Appendix G states that "final temporary and permanent impacts to proposed jurisdictional areas are reported in Chapter 4 of the Natural Environmental Study and are shown on the Project Map Sheets (Appendix C)." However, Chapter 4 of the Natural Environmental Study contains the same data for wetland impacts that were included in the DEIR and also refers back to the Wetland Report (which has not been provided). Commission staff requests that Caltrans provide the baseline or underlying wetland reports so that they may complete a more complete evaluation of the affected areas.

Commission staff is concerned that the DEIR does not appear to adequately characterize oak woodland habitat. The DEIR states: "Oak woodlands are defined as a 5-acre circular area containing five or more oak trees per acre (Senate Concurrent Resolution No.17). (p. 352). Please note that the LCPs in each affected area, as well as the Coastal Act, contain the applicable standards and definitions for habitat communities. Accordingly, we ask that Caltrans evaluate whether any of the areas where the 220 oak trees to be removed would be considered oak woodland under these standards of review and, if so, quantify the amount of oak woodland habitat proposed to be removed.

The DEIR states that several of the new or modified bridge structures will result in increased shading over the creek beds. (p.364) Shading results in a decline in biological productivity by eliminating photosynthesis and in turn, reducing leaf litter that would otherwise be available as a food source. Please evaluate potential habitat impacts from shading from the new or modified bridge structures. Appropriate mitigation for shading

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impacts might be to replace existing hardened banks with biotechnical bank revetments that would enhance the growth of vegetation. Please evaluate potential mitigation for shading from the new or modified bridge structures.

The DEIR states that, after construction of the bridges at Romero Creek, San Ysidro Creek, and Oak Creek, the creek channel would be partially blocked off/walled off to maintain the current channel width until capacities are improved throughout the reach (p.381). According to the DEIR, when Santa Barbara County Flood Control District achieves its goals of improving creek capacities throughout the reaches of concern, county and highway bridges can be used to the fullest, but there are no set plans for when downstream improvements would be made (p.381). Please explain the method(s) proposed to partially block off the lengthened bridge span.

The DEIR states that the extended spans of the new bridges would "help reduce flow velocities in the state right-of-way." It should be made clear whether or not velocity barriers at the bridge would be completely or partially mitigated. The DEIR should elaborate on fish passage and how fish passage has been addressed for each bridge structure in the project reach and describe additional, remaining barriers to fish passage in the corridor.

How does modifying or replacing each bridge comply with existing fish passage requirements that Caltrans must meet under State mandates, which states that all streams that have historically had steelhead populations must be provided passage?⁶ For creek channels that have been blocked off pending flood capacity improvements, what type of capacity or other improvements (e.g. removal of physical barriers to fish passage outside the highway right of way on parallel transportation facilities) need to be made in the corridor, upstream or downstream, before it would be possible to restore and enhance the affected creeks? Should any of these improvements be considered as a component of the mitigation strategies necessitated by this proposed project?

Section 2.3 Avoidance, Minimization, and Mitigation Measures

Evaluated under LCP policy requirements, the DEIR does not provide for appropriate mitigation ratios for impacts to coast live oak trees, sycamore trees and willow trees. The mitigation ratio proposed in the DEIR is 3:1 for coast live oaks or western sycamore greater than 6 inches diameter at breast height and 3:1 for willows (p.353-354). In past actions, the Commission has found that the loss of individual native trees, including oak trees, sycamores, and willows should be mitigated at a replacement ratio of 10:1. Further, the Commission has previously found that permanent impacts to riparian habitat should be mitigated at a 3:1 ratio.

The DEIR also states that disturbed areas that are not replanted with riparian trees or shrubs would be stabilized and seeded with native grasses and forbs (p.353). Please note that it will be necessary to revegetate all areas where riparian vegetation has been temporarily disturbed or removed due to construction activities *using native plant*

⁶ SB 857 Section 156.3. states "For any project using state or federal transportation funds programmed after January 1, 2006, the department shall insure that, if the project affects a stream crossing on a stream where anadromous fish are, or historically were, found, an assessment of potential barriers to fish passage is done prior to commencing project design."

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species that are appropriate for a riparian habitat area. All invasive and non-native plant species should be removed from the revegetation area.

The DEIR recommends that, "prior to any ground disturbing activities, environmental-sensitive-area fencing would be installed around the drip line of the trees to be protected" (p.354). It is preferable to have fencing installed at least five feet from the drip line of trees to be protected.

For wetland mitigation, the DEIR differentiates between "human-made" wetlands (as referred to in the DEIR) and natural wetlands. The DEIR states that "Human-made wetlands (roadside drainage features) would be replaced with more human-made wetlands. Sites chosen for mitigation would be within the project limits where feasible. New vegetated ditches that receive and filter highway runoff would replace the function of the vegetated roadside ditches that are considered coastal wetlands..." For permanent impacts to coastal zone and U.S. Army Corps of Engineers wetlands, Caltrans proposes a 1:1 to a 3:1 ratio "based on resource agency recommendations as well as the function and quality of wetland habitat that needs to be replaced" (p.383). The Commission generally does not distinguish between man-made wetlands and natural wetlands or the function and quality of wetlands to determine mitigation. In past actions, the Commission has found that the loss of any wetlands should be avoided if any feasible alternatives exist. In the event that the loss of wetlands is unavoidable, the Commission has found that the permanent loss of wetlands should be mitigated at a replacement ratio of no less than 4:1.

The DEIR proposes offsite mitigation at the Carpinteria Salt Marsh if all mitigation cannot occur onsite (p.384). Please note that mitigation for the direct loss of any wetland habitat should be the creation of new wetland habitat (at least 4:1 ratio). Have areas within the Carpinteria Salt Marsh been identified that will enable the *creation* of new wetlands (as opposed to enhancement of existing wetlands)?

Design Alternatives:

For Alternative 1, Alternative 2, and Alternative 3, five bridge structures are proposed to be replaced at the following creek crossings: Arroyo Pardon Creek, Toro Canyon Creek, Romero Creek, San Ysidro Creek, and Oak Creek (Natural Environment Study, p.v). Bridges at Arroyo Pardon, Romero, Oak, and San Ysidro creeks are proposed to be replaced by structures that extend beyond the existing footprint (DEIR, p.351). The bridge structures at Franklin and Santa Monica Creeks are proposed to be widened. The DEIR does not adequately evaluate design alternatives for each area of impact to creek corridors, riparian areas, or wetland habitats. The Coastal Act and applicable certified LCPs require that existing environmentally sensitive habitat areas, such as riparian areas, be protected against any significant disruption of habitat values and that development in areas adjacent to significant habitat areas be sited and designed to prevent adverse effects which would degrade such areas. For each portion of the proposed project that will impact any creek, riparian habitat, wetland, or any area designated as ESHA, the engineering need for such development should be explained and all design alternatives to minimize the footprint of development at each particular location should be thoroughly evaluated. Rock slope protection with willow plantings is proposed at various points along the project reaches. Please evaluate design alternatives for each to avoid the placement of rock rip rap or other hard structures

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within the creek and/or evaluate alternatives to limit the amount of fill to the maximum extent necessary at each site.

Section 2.4 Construction Impacts

Biology

The only identified biological impact under construction impacts is temporary impacts to creeks from equipment access, temporary water diversions and dewatering, and temporary fill placement. (p.408) Please thoroughly explain these impacts, including where creeks are proposed to be diverted and how and explain what "temporary fill" is proposed for the creeks and explain how these impacts can be minimized (p.382).

An evaluation of impacts of construction noise on nesting bird species in the project reach is also needed.

Water Quality

Regarding wetland disturbance, the DEIR states: "Temporary disturbances to existing wetlands during construction would be avoided to the maximum extent feasible. Where temporary disturbances to wetlands are unavoidable, reasonable measures to maintain the original grade and soil characteristics should be used to prevent permanent wetland loss" (p.410). Please explain where temporary disturbances to wetlands are proposed to occur. In addition, again, an analysis of where development would occur in wetland buffers versus wetlands is also needed.

Noise

The DEIR states that no adverse noise impacts from construction are anticipated because construction would be conducted in accordance with Caltrans Standard Specifications Section 14-8.02 and applicable local noise standards (p.414). The DEIR does not explain the local standards nor does it thoroughly discuss noise impacts as they may relate to sensitive species. The DEIR should provide an analysis of construction noise impacts in light of the standards listed in the LCPs of the County of Santa Barbara, City of Santa Barbara, and City of Carpinteria.

Section 2.5 Cumulative Impacts

The DEIR does not provide an adequate and complete analysis of cumulative impacts. The only cumulative impact identified is to visual resources (p.419). Further, the DEIR does not provide the CEQA and NEPA definitions of cumulative impacts (p.418). Instead, the DEIR states: "As specified in Caltrans/Federal Highway Administration guidance, if the proposed project would not result in a substantial direct or indirect impact to a resource it would not contribute to a cumulative impact on that resource" (p.418). Commission staff does not believe that this statement is not consistent with CEQA, NEPA or Coastal Act definitions of cumulative impacts and that this interpretation likely limits the identification of bona fide cumulative impacts that may be associated with the proposed project. CEQA, NEPA, and Coastal Act definitions all refer to *incremental effects* of a project. Please include the proper definitions of cumulative

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impacts and provide a complete and thorough analysis of potential cumulative impacts in areas including, but not limited to, biological resources, cultural resources, visual resources and community character, public access, and water quality.

Thank you for the opportunity to review and comment on the subject DEIR/EA at this time. We continue to encourage early and regular contact between our staffs, and those of the local governments, as responses to these comments are being developed. And, we'll look forward to reviewing any additional project alternatives, revised or supplemental CEQA documents, and proposed LCP amendments as they are drafted.

Our hope is that this response will foster a process of interagency collaboration, and will lead to the optimum, approvable solution for the project need and purpose. If you have any questions regarding these comments, please contact Amber Geraghty at 805-585-1800. We look forward to working with you.

Sincerely,



Steve Hudson
District Manager

California Coastal Commission

General Response

Throughout the project development process, Caltrans seeks to abide by and be consistent with the California Coastal Act and local coastal plans. Caltrans recognizes and appreciates the fact that Coastal Development Permits and Local Coastal Plan Amendments are needed for this project to gain the necessary approvals. An amendment to the Local Coastal Plan for the City of Carpinteria is currently in progress.

The project development team has selected the least environmentally damaging alternative. Through careful consideration of the current environment and thoughtful design, Caltrans has tailored the project to avoid or minimize coastal impacts as much as possible. This has been achieved by extensively studying the project area, obtaining exceptions to its standard design process, adjusting the pavement width in consideration of resources, and following Caltrans Noise Protocol that considers whether soundwalls are reasonable or feasible. Further along in this project's process, as Caltrans refines its details, Caltrans staff will work with Santa Barbara County and the Cities of Carpinteria and Santa Barbara to address the requirements of the California Coastal Act.

Some local agencies combine their California Environmental Quality Act (CEQA) and coastal permitting processes. This is appropriate for agencies with a Local Coastal Plan and lead agency status under the California Environmental Quality Act. In the case of this project, Caltrans is lead under the California Environmental Quality Act and, as a state agency, adheres to an established state process in which California Environmental Quality Act and the California Coastal Act are addressed separately. In general, the California Coastal Commission staff comments on the draft environmental document make a number of recommendations and reference information that are not necessarily required during the California Environmental Quality Act process

and are beyond the scope of the process for which this document was written. The Local Coastal Plans and any needed amendments are related but distinctly different and stand-alone actions. Caltrans appreciates the comments and will work with Coastal Commission staff to address them during the coastal permitting process, which will occur during the project's design phase.

The South Coast 101 HOV Lanes proposal is one project in a larger consensus-approved package of improvements that came out of the Santa Barbara County Association of Governments-sponsored *101 In Motion* process. This larger package, which has since been further funded through the Measure A local transportation sales tax measure and included as planned improvements in the 2008 Regional Transportation Plan, provides a multimodal approach to long-term congestion relief in this corridor. In relation to the South Coast 101 HOV Lanes project alternatives, the No-Build Alternative would result in decreased coastal access due to increased delays on U.S. 101, the main travel artery in the region. Pedestrians and bicycle traffic are prohibited on U.S. 101 in the project area. However, the project would maintain or improve any bicycle or pedestrian facilities on the local street system that would otherwise be directly affected by the project. Caltrans will coordinate with the City of Santa Barbara and Santa Barbara County Association of Governments in their endeavor to replace the existing railroad structure that is a deterrent to bicycle and pedestrian connectivity. Also, Caltrans will work with our local partners and Coastal Commission staff during the Coastal Development Permit process to address any needed Local Coastal Plan Amendments.

California Coastal Commission

Comment 1 Local Coastal Plan

Table 1.3 has been amended to acknowledge that a Local Coastal Plan Amendment is required for both the County of Santa Barbara and the City of Carpinteria as a result of the project's anticipated encroachment into required

setbacks for wetland buffers. It should also be noted that steps have been taken to move the Local Coastal Plan amendment process forward in Carpinteria with a joint application for the South Coast 101 HOV Lanes and the Linden and Casitas Pass Interchanges projects.

California Coastal Commission

Comment 2 Local Coastal Plan

The California Environmental Quality Act does not require an analysis of all the policies for which the project is consistent, only policies for which the project is inconsistent. There is no requirement for Caltrans to provide an analysis of all the ways the project would adhere to Local Coastal Plans. Caltrans used a policy consistency analysis as an internal tool for developing the environmental document. Caltrans will address the requirements of any applicable Local Coastal Plans during the Local Coastal Plan Amendment process; Caltrans acknowledges that a Coastal Development Permit cannot be applied for without the amendments to the Local Coastal Plans for City of Carpinteria and County of Santa Barbara.

In response to this comment, additional text has been added to support Sections 2.1.1.2 and 2.1.1.3. Also, Section 30251 of the California Coastal Act is now included in Table 2.2 of the final environmental document. It should be noted that the Coastal Act is a federal law and is addressed in Section 2.1.1.3.

California Coastal Commission

Comment 3 Local Coastal Plan

Please refer to the response to Comment 2 above. It should be noted that the Coastal Act is addressed in Section 2.1.1.3 and 2.1.1.2. For further discussion of policy inconsistencies, please refer to Section 2.1.1.2. Changes were made to Table 2.2 to discuss potential impacts from the proposed soundwalls.

California Coastal Commission

Comment 4 Local Coastal Plan

Please refer to the response to Comment 2. As noted by the Coastal Commission staff comment, the project would improve the driving experience for those traveling through the project area to access coastal areas. Caltrans' statement that the project would enhance access to coastal resources by improving vehicular circulation within the U.S. 101 corridor is accurate as well. U.S. 101 is the main route for interregional traffic in the coastal zone in the region. The preferred alternative enhances coastal access by reducing congestion and travel time for drivers attempting to reach coastal resources, thereby ensuring that coastal access is significantly enhanced from a regional perspective. As stated on page 23 of the draft environmental document, the project development team used a set of guiding principles when developing project alternatives. One of the guiding principles was a reduction of corridor delay by at least 7,000 person-hours daily. The proposed project achieves this goal as documented by the South Coast 101 HOV Traffic Study (p. 2 Forecast Operations Report), which notes that with construction of the project, on a daily basis, person-hours will be reduced by 11,435 hours in 2040 (62% delay reduction benefit).

Please refer to Section 2.1.5 for more information about bicycle and pedestrian routes. The project would facilitate pedestrian and bicycle access by ensuring all existing paths are retained or replaced as necessitated by the project. It is important to note that bicyclists and pedestrians are not users of the freeway in the project limits. The purpose and need for the project that were indicated on page 7 of the draft environmental document pointed out that the essential purposes of the South Coast 101 HOV project are to reduce congestion and delay, provide capacity for future demand, improve travel time within the project limits, and provide HOV-lane continuity that encourages and facilitates the use of public transit and carpooling.

The following text was added to Section 2.1.5 (see Bicycle and Pedestrian Routes) of the final environmental document to expand on the regional enhancements that would improve public access to coastal resources: As a result of ongoing discussions after release of the draft environmental document, the Santa Barbara County Association of Governments has taken the lead on two separate projects that will be part of the Local Coastal Plan Amendment package for the City of Carpinteria. The Local Coastal Plan Amendment process is moving forward with two projects—the South Coast 101 HOV Lanes project and the Linden and Casitas Interchanges Improvement project. The first of the regional enhancement projects is the Santa Claus Lane Bike Path, which will extend from Santa Claus Lane to Carpinteria Avenue. This Class I path will close a coastal trail gap. The second of these enhancements is the Rincon Coastal Trail, which will extend from Carpinteria Avenue to Rincon County Park. The proposed improvement will close the coastal trail gap between Carpinteria Avenue and the new Class I trail along U.S. 101 at Rincon.

California Coastal Commission

Comment 5 Local Coastal Policies

Please refer to the General Response to Coastal Commission staff comments. This comment is beyond the scope of the California Environmental Quality Act action for which the draft environmental document was written. The Local Coastal Plans and any needed amendments are related but distinctly different and stand-alone actions. Discussion of pertinent coastal policies will be addressed further when the application is made for a Coastal Development Permit. As discussed earlier in the general response, Caltrans is currently pursuing a local coastal plan amendment in conjunction with the Linden and Casitas Interchange project. The project team, aware of the wetland policy setbacks and riparian or top-of-bank buffers, has worked to refine the alignment to avoid wetland resources, but total avoidance is not feasible given the existing conditions and nature of the project (see Summary and Section 2.1.1.3 in the final environmental document). Alternative 1 (the

preferred alternative) proposes selective inside and outside widening within available right-of-way. This alternative was developed to maximize opportunities to retain and refine high-value resources including scenic views, wetlands and median/outside landscaping. Minor impacts to wetlands remain, and these wetland impacts will be mitigated at a 3:1 ratio. The preferred alternative would permanently impact 0.229 acre of wetland and temporarily impact 0.369 acre of wetland. Section 2.1.1.3 of the draft and final environmental documents acknowledge that additional measures may be required as conditions of the Coastal Development Permits.

California Coastal Commission

Comment 6 LCP Amendment

An update has been made to Table 1.4 to reflect the need for amendments to the Local Coastal Plans for the City of Carpinteria and the County of Santa Barbara due to conflicts with wetland policies.

California Coastal Commission

Comment 7 Multi-modal Trail Linkage

Please refer to the General Response to Coastal Commission staff comments. The project is generally consistent with the Coastal Act because it improves the main interregional route in the project area, thereby ensuring continued access to the coast for locals and visitors alike. Caltrans acknowledges that the provision of this public access may necessarily conflict with other Coastal Act resource policies (wetlands, visual, and potentially environmentally sensitive habitat areas (ESHA)).

The preferred alternative will avoid impacts to wetlands and minimize vegetation removal to the greatest extent possible. Minor impacts to wetlands remain and will be mitigated at a 3:1 ratio. Measures have been provided to minimize both visual impacts (see Sections 2.1.6 and Section 2.3.2) and biological impacts. (See also Appendix F for the Minimization

and/or Mitigation Summary for a complete discussion of biological and visual measures such as replacement planting, aesthetic treatments to soundwalls, consideration of visual character, application of textured surfaces, architectural treatments, and open-style bridge railing.)

As for pedestrian and bicycle trail linkages, the local coastal amendment process will ensure that the desired trail improvements will occur despite not being part of the project(s). Separate from the South Coast 101 HOV Lanes project is a coordinated effort led by the Santa Barbara County Association of Governments (the applicant) and City of Carpinteria to build two trails deemed necessary as part of the local coastal amendment process. The two trails --the Santa Claus Lane Class I Bike Path is linked with the South Coast 101 HOV Lanes Project and the Rincon Coastal Trail is linked with the Linden Avenue and Casitas Interchange project. This information was updated in Section 2.1.5 of the final environmental document. Each of these paths would fill critical gaps in the overall trail system. The combination of the two trails, the proposed project, and the remaining elements of *101 in Motion* would move Santa Barbara County closer to meeting the goals necessary to decrease the overall production of greenhouse gas emissions.

The Coastal Act, Section 30007.5, recognizes that conflicts may occur between one or more coastal policies. The California Legislature provided a mechanism for resolving those conflicts by declaring that policy conflicts should be resolved in a manner that on balance is the most protective of significant coastal resources. In this context, the Legislature declared that broader policies which, for example, serve to concentrate development in close proximity to urban and employment centers may be more protective, overall, than specific habitat and other similar resource policies.

Denying or changing the South Coast 101 HOV Lanes project to eliminate these potential inconsistencies would conflict with other Coastal Act policies

that mandate protecting and enhancing public access to the coast and enhancing shoreline and upland recreation areas in the Coastal Zone. Accordingly, approving the South Coast 101 HOV Lanes project for purposes of addressing public access and coastal resource needs is the approach that, on balance, is the most protective of significant coastal resources.

Finally, it should be noted that the Local Coastal Plans and any needed amendments are related but distinctly different and stand-alone actions. Discussion of pertinent coastal policies will be addressed further when the application is made for a Coastal Development Permit.

California Coastal Commission

Comment 8 Multi-modal Trail Linkage

Please refer to response to comment 7 above.

California Coastal Commission

Comment 9 LCP Amendment

Please refer to the response to the previous comment and Section 2.1.1.3 of the final environmental document where information has been added with regard to the Rincon Coastal Trail and Santa Claus Lane Bike Path, which are being initiated separately by the Santa Barbara County Association of Governments and City of Carpinteria.

In addition, this issue is addressed in the General Response to Coastal Commission staff comments.

California Coastal Commission

Comment 10 General Revisions Suggested for Sections 2.1.1.2 and 2.1.1.3

Section 2.1.1.2 was revised in the final environmental document to show that the project would conflict with land use policies as stated in Section 2.1.1.2.

The reference to “Santa Barbara Country Coastal Land Use Plan” was changed to “Santa Barbara County Local Coastal Plan.”

California Coastal Commission

Comment 11 Alternatives

Please refer to the General Response to Coastal Commission staff comments. The preferred alternative balances input from local partners and coastal staff to avoid or minimize impacts to coastal resources to the greatest extent possible. Caltrans and the Santa Barbara County Association of Governments, in consultation with all commenting agencies and individuals, have determined that the preferred alternative best satisfies the purpose and need of the project and would meet the transportation needs of the Santa Barbara U.S. 101 corridor. The project would encourage carpools, vanpools and transit use. Caltrans will be closely coordinating with the Coastal Commission during final design and the permit process to address coastal access refinements.

Caltrans, the Santa Barbara County Association of Governments, and several other state and local agencies worked together to develop the “South Coast Highway 101 Deficiency Plan” (2002) and the “101 In Plan” (2006). These plans analyzed several options for improving circulation within the U.S. 101 corridor, including widening the highway with mixed-flow travel lanes in each direction or adding a High Occupancy Vehicle (HOV) lane in each direction. Congestion relief was also analyzed in the recent SBCAG Regional Transportation Plans (RTPs). The recently approved Regional Transportation Plan (August 2013) also recommends adding part-time HOV lanes (during peak travel periods) within the project limits for the South Coast 101 HOV lanes project. As noted in the draft and final environmental documents, this project was initiated at the request of SBCAG following completion of the SBCAG *101 In Motion* study.

California Coastal Commission

Comment 12 Multi-modal Connections

Please refer to Section 2.1.5 for more information about bicycle and pedestrian routes. The project would facilitate pedestrian and bicycle access by ensuring all existing bicycle and pedestrian facilities are retained or replaced as necessitated by the project. Note that bicyclists and pedestrians are prohibited from using the freeway in the project limits. The purpose and need for the project were indicated on page 7 of the draft environmental document. The essential purposes of the South Coast 101 HOV Lanes project are to reduce congestion and delay, provide capacity for future demand, improve travel time within the project limits, and provide for HOV lane continuity and encourage the use of public transit and carpooling.

California Coastal Commission

Comment 13 Bicycle and Pedestrian Facilities

Please refer to the response for Comment 4 and Section 2.1.5 (Traffic/Transportation, Pedestrian and Bicycle Facilities) in the final environmental document for more details on pedestrian and bike facilities.

Measures to minimize temporary construction-related traffic impacts are identified in the Transportation Demand Management options and the Traffic Management Plan. See Volume 1, Chapter 1 (Transportation Demand Management), Sections 2.1.5 (Traffic/Transportation, Pedestrian and Bicycle Facilities) and Section 2.4 (Construction Impacts) in the final environmental document.

California Coastal Commission

Comment 14 Visual and Soundwalls

Please refer to the General Response to Coastal Commission staff comments. The part of this comment that refers to coastal policy is beyond the scope of the California Environmental Quality Act action for which the draft

environmental document was written. Scenic and visual qualities are protected under the Coastal Act. During the Coastal Development Permit process, in their role as permitting agency for local coastal development, local jurisdictions may choose not to permit specific soundwalls as part of the project.

Section 2.1.5 (Visual/Aesthetics) of the draft environmental document found that proposed soundwalls would contribute to the increase in urban character caused by the project. In addition to the visual character issue, the draft environmental document identified specific areas where quality ocean views would be substantially blocked. As a result, several potential soundwalls were recommended for elimination from the project (see below). Transparent panels are being considered for one location in Summerland where it may be possible to maintain an ocean view, but meet the requirement specified by the maintenance division for a minimum of an 10-foot-high block wall base.

Three soundwalls (S374, S392, and S414) in Summerland were originally considered, but were subsequently eliminated because all three would block prime ocean views. Another soundwall (S281) farther west and parallel to Padaro Lane would add to the area's general urbanization, but would not block ocean views because the views have already been blocked by existing vegetation and development.

Other soundwalls proposed in Summerland would not block quality views of the Pacific Ocean or the Carpinteria Salt Marsh. Soundwalls S90, S98, S158, S174, and S181 would have no effect on ocean marsh views because no views currently exists from applicable viewpoints. Soundwall S210, between U.S. 101 and Via Real, would not block ocean or marsh views because the wall would be placed on the inland side of the highway. As seen from Via Real near proposed Soundwall S210, existing views to the ocean and marsh are of low

quality and substantially compromised by views of the freeway, live traffic, fencing, and three layers of roadside and median plantings.

The project includes avoidance measures such as not recommending construction of the three soundwalls mentioned earlier to protect existing views of the Pacific Ocean and the Salt Marsh. In addition, the draft environmental document included 31 mitigation measures intended to reduce potential impacts to coastal visual resources. Identified mitigation measures are related to specific impacts, consistent with project purpose and need, are implementable and feasible, and are consistent with state and national safety design practices.

The existing Caltrans debris storage and rock- and asphalt-crushing activities between Santa Claus Lane and U.S. 101 in Carpinteria are necessary to the operation and maintenance of U.S. 101. Due to the limited options for locating this facility, the separate maintenance operation must continue. This facility is not directly related to the South Coast 101 HOV Lanes project and therefore should not be associated with mitigation measures for the project.

California Coastal Commission

Comment 15 Memorial Oaks

The Memorial Oak trees are coast live oak trees (*Quercus agrifolia*). The preferred alternative would remove 16 oaks from the highway median and retain the oaks on the road shoulder.

The Memorial Oaks are of local interest and are recognized and discussed in Section 2.1.6 as part of the Padaro Assessment Unit. Accordingly, they are analyzed for their potential scenic value along with other corridor vegetation in Section 2.1.6, after the discussion of the various assessment units. Although a detailed planting design for the Memorial Oaks area has not been prepared at this time, mitigation measures relative to the loss of the Memorial Oaks

and other corridor vegetation are identified in two locations in the final environmental document: the end of Section 2.1.6 and in Appendix F. Memorial Oak tree replacement will occur as close to the area of loss as possible considering safety and horticultural needs. Oak trees lost during construction of the project would be mitigated at a ratio of 3:1.

California Coastal Commission

Comment 16 Cultural Resources

As documented in Section 2.1.7 (Cultural Resources) of the draft environmental document, elements of the Via Real Redeposited Midden were moved onsite from their original location in connection with an early highway project. Recent design revisions were able to shift Alternative 1 (preferred alternative) toward the median in an effort to minimize potential impacts to the site. Comprehensive studies conducted by Caltrans suggest that the National Register-eligible portion of the site is not only located below the level of proposed U.S. 101 construction but is also located outside the State right-of-way—and therefore outside the Area of Direct Impact. An Environmentally Sensitive Area (ESA) and exclusionary fencing will be established and enforced around the known site limits. Although we do not anticipate that there will be any impacts to the redeposited midden, or that significant portions of the site extend into the State right-of-way, or that any other significant archaeological resources are present, Caltrans has deemed it prudent to consider the remote possibility that discoveries during construction may still occur.

Santa Barbara County Comprehensive Plan Land Use Element Historical and Archaeological Sites Policy 3 and Coastal Land Use Policy 10-3 state: “When sufficient planning flexibility does not permit avoiding construction on archaeological or other types of cultural sites, adequate mitigation shall be required. Mitigation shall be designed in accord with guidelines of the State Office of Historic Preservation and the State of California Native American Heritage Commission.”

Caltrans has consulted with the State Historic Preservation Officer and local Chumash representatives identified by the Native American Heritage Commission to develop a systematic approach to addressing not only any adverse effects to the Via Real Redeposited Midden but also effects to any similar as yet unidentified archaeological resources discovered during construction, in the unlikely event that such discoveries are made. Adverse effects will accordingly be resolved in conformity with the Treatment and Data Recovery Plan appended to the June 20, 2013 *Programmatic Agreement Between the California Department of Transportation and the California State Historic Preservation Officer Regarding the South Coast 101 HOV Lanes Project, U.S. Route 101, Santa Barbara County, California*. Both the Programmatic Agreement and the Treatment and Data Recovery Plan are included in this document—see Appendix D, *State Historic Preservation Officer Correspondence*.

California Coastal Commission

Comment 17 Water Quality

The final environmental document includes information that addresses the quantitative water quality impacts by showing net new impervious area for each affected creek. In response to the comment, a preliminary hydromodification analysis was done and impacts were determined based on the project features, existing stream geometry and potential changes in flow. A final hydromodification analysis will not be possible until a detailed design is provided during the design phase. At this time, the same types of design pollution prevention best management practices for detaining water onsite, promoting infiltration, and meeting post-construction runoff standards were considered for all build alternatives. Alternative 1 proposes to have segments of U.S. 101 widen to the inside and other segments widen to the outside. Where widening occurs to the center, more room will be available on the outside shoulders for placement of best management practices. Conversely, in

locations where the project widens to the outside, there will be less room. The Coastal Commission staff's assessment is correct that there will be areas within the project where no treatment will be feasible. There are currently no plans to purchase right-of-way due to the urban nature of this corridor and areas where the railroad right-of-way immediately abuts the State right-of-way. Design pollution prevention best management practices and permanent storm water treatment best management practices will be included wherever feasible.

California Coastal Commission

Comment 18 Water Quality and Storm Water Program

See response to comment 17 above.

California Coastal Commission

Comment 19 Water Quality - Vegetated Treatments and Site Design BMPs

Caltrans has studied vegetated treatments and published the results on its storm water web page at www.dot.ca.gov/hq/env/stormwater. As stated in the report titled *Roadside Vegetated Treatment Sites (RVTS) Study, November 2003*, "many existing vegetated areas along highways have performance levels that are comparable to systems engineered and operated specifically for water quality improvement." Based on evaluation of the data collected during the two-year monitoring study, it was found that a minimum vegetative cover of about 65% is required for concentration reduction to occur. Concentration reductions consistently occur for total suspended solids and total metals and frequently for dissolved metals.

Site design best management practices, or design pollution prevention best management practices, such as minimizing increases in impervious surfaces, preserving existing vegetation, using open vegetated storm water conveyance systems, promoting infiltration, and using slope/surface protection systems, are some of the site design best management practices that are considered

for this and every Caltrans project. In addition to reducing pollution in discharges by retaining source materials and stabilizing soils, design pollution prevention best management practices can provide water quality benefits similar to treatment best management practices. These benefits have not been quantified as has been done for approved treatment best management practices, but may include the settling of solids and other pollutants, increasing detention time within the drainage system to allow infiltration where conducive, and using ancillary filtration and infiltration within vegetated conveyances and surfaces. Permanent storm water treatment best management practices would be considered using the process outlined in the Caltrans Storm Water Quality Manual and the Project Planning and Design Guide.

All efforts will be taken to place best management practices in the same watershed where the impact is expected to occur. Due to site constraints such as high ground water levels in some locations, slow percolating soils, terrain, and lack of space to place best management practices, it is not anticipated that this goal will be fully realized. Therefore, offsite best management practices may be considered to minimize anticipated impacts. No offsite best management practices beyond the watershed limits of this project are under consideration at this time.

California Coastal Commission

Comment 20 Water Quality - Maximum Extent Practicable

Caltrans concurs with this approach; this rationale is used for every Caltrans project.

California Coastal Commission

Comment 21 Water Quality - Design Considerations

Caltrans considers design pollution prevention best management practices for every project. Caltrans adheres to mandatory design standards, which relate

to the safety of the traveling public and highway workers. These mandatory design standards are the limit to which impervious surfaces may be reduced.

The minimum standard paved exterior shoulder width for this type of facility for new construction or major reconstruction is 10 feet. It is the mandatory standard in the Caltrans Highway Design Manual (mandatory design standards are those considered essential to achieve overall design objectives). This is also one of the 13 controlling criteria of primary importance for highway safety as determined by the Federal Highway Administration and found in 23 Code of Federal Regulations 625. Average Daily Traffic volumes are forecasted to be 76,000 to 101,000 in the construction year, and the design and posted speeds are 65 miles per hour. For safety reasons and consideration of the shared use by motorists and maintenance workers, a 10-foot paved exterior shoulder is the appropriate width.

The Caltrans process requires that the design standards used for any project should equal or exceed the minimum given in the Highway Design Manual to the maximum extent feasible. The engineer's application of accepted design practices provides confidence that the public safety would be best served.

The American Association of State Highway and Transportation Officials Policy on Geometric Design of Highways and Streets, 2004 is considered the national standard and states that well-designed and properly maintained shoulders are needed on highways because: Space is provided away from the traveled way for vehicles to stop in the event of mechanical difficulties, flat tires, or other emergencies; space is provided for evasive maneuvers to avoid or reduce the severity of accident; the sense of openness created by shoulders of adequate width contributes to driving ease and reduced stress; lateral clearance is provided for signs and guardrails; storm water can be discharged farther from the traveled way; seepage adjacent to the traveled way can be minimized to

reduce pavement breakup; and structural support is given to the main line pavement.

California Coastal Commission

Comment 22 Water Quality - Bridge Design

The Caltrans storm water quality guidance with regard to bridge design requires designers to consider the following basic storm water quality principles for bridge projects:

1. Bridge Replacement: Bridge deck runoff should be conveyed to treatment best management practices at the abutments if site topography and regulatory agencies allow. If a storm water conveyance system cannot be installed without re-designing the structural components of the bridge, then the impacts of a storm drain system incorporated into the new bridge design need to be evaluated for technical and fiscal feasibility.
2. Bridge Retrofit: If a storm water conveyance system cannot be installed without re-designing the structural components of a bridge retrofit project, then this needs to be documented and the documentation placed in the project file.
3. General: If treatment best management practices are infeasible due to site topography or regulatory agency restrictions, it still may be advisable to evaluate the feasibility of conveying runoff to the abutments and installing appropriate pollution prevention best management practices (down drains, hard surfacing, etc.). If at all possible, storm water runoff should be directed to vegetated areas prior to entering the receiving water in a non-erosive manner.
4. General: Strategies to minimize water quality issues relating to the bridge deck should be considered. For example, Highway Design Manual 837.3(2) recommends intercepting roadway drainage prior to the bridge deck and intercepting runoff from the bridge deck on the downstream side. This strategy minimizes the amount of water running onto the

deck and requiring disposal.

California Coastal Commission

Comment 23 Water Quality - Design Exceptions

Design configurations that would improve water quality have not been ruled out due to the need for a design exception. For example, in general, widening to the inside will minimize water quality impacts because there will be less new impervious surface created, allowing for more areas to place treatment best management practices and maximize infiltration to the outside shoulders of the facility. This is one of many factors that were weighed when selecting a preferred alternative. Also keep in mind that there are mandatory design standards, which relate to the safety of the traveling public and highway workers that must be met.

California Coastal Commission

Comment 24 Water Quality - Best Management Practices - Treatment

Per the Caltrans Project Planning and Design Guide, a Best Management Practices Consideration Checklist is used to determine the appropriate treatment best management practices to be considered for a project. One of the considerations in the checklist is whether dry weather flows might be generated by a project. The Amended Water Quality Assessment Report included this checklist item in its discussion simply to state this was one of the parameters we consider. However, the most recent version of the Storm Water Data Report created for this project states that the project will not generate any dry weather flows. Therefore, it is not anticipated that the project would be required to include any features or actions to address offsite dry weather flows.

California Coastal Commission

Comment 25 Water Quality - Permeable Pavement/Open-Grade Asphalt

No applicable standards are available at this time. Permeable pavement for use on non-highway facilities such as park and ride lots, gore areas, safety and roadside rest areas can be approved by Caltrans on a case-by-case basis. Studies to increase the use of permeable surfaces in the highway environment are ongoing. It is expected that once the project is farther along in the design process, permeable surfaces will be included to the extent that their use has been approved by Caltrans Office of Pavement Design.

Studies have suggested that open-grade asphalt, which is a noise-attenuating-type of surfacing, has water quality benefits. Caltrans is currently studying any potential water quality benefits associated with open-grade asphalt other than an apparent reduction of storm water spray from tires.

California Coastal Commission

Comment 26 Water Quality - "50% Rule"

Current design guidance (and the new Caltrans MS4 permit) requires that if a project will add more than 50% of the existing impervious surfaces, all impervious (new plus existing) should be considered for treatment. On the other hand, if a project creates less than 50% of the existing impervious surfaces, the water quality flow to be considered for treatment is based on the quantity of new impervious surfaces. With the identification of Alternative 1 as the preferred alternative, the project would add less than 50% of the existing impervious surfaces. The project will incorporate design pollution prevention best management practices and permanent storm water treatment best management practices to the maximum extent practicable, with the goal of improving water quality.

California Coastal Commission

Comment 27 Water Quality - Hydromodification and Polluted Runoff

As a result of your comments, an Addendum to the Water Quality Assessment Report was prepared in April 2014. In addition, Volume I, Section 2.2.2 of the

final environmental document was updated with this information. The update includes a quantitative analysis for the water quality impacts to the various watersheds in the project area. Based on an assessment of the beneficial uses, water quality standards, and typical highway runoff water quality constituents, the project will not have significant impacts to water quality. An analysis was also done to evaluate cumulative water quality impacts for each watershed by comparing the change in impervious surfaces in the right-of-way to the existing impervious surfaces in each watershed. Table 2.51 of the final environmental document quantifies the changes in impervious coverage in the larger watersheds. In one location, it will have less than a 0.05 acre increase of permanent impacts and only 0.4 acre of temporary impacts. Typically, the table shows the percentage of impervious surface area within the State right-of-way is minor compared to the overall impervious surface area within a watershed, especially an urbanized watershed.

California Coastal Commission

Comment 28 Water Quality - Watershed Impervious Surface

An addendum to the Water Quality Assessment (April 2014) was prepared in response to your comment. A preliminary hydromodification analysis was done that included creating a table showing the project's estimated increase in impervious surfaces per watershed (Table 2.51 of the final environmental document). Minor hydromodification would occur within the project footprint due to the increase in impervious surface area, but the increase would not be significant compared to the overall impervious surface area contained within each watershed. Therefore, the impacts would be less than significant. Once the project is in the design phase, a more detailed hydromodification analysis will be conducted, which will quantify increased runoff amounts. As mentioned in the Addendum to the Water Quality Report, the goal is to match pre-construction (existing) runoff rates to minimize impacts. Even in watersheds without the potential for treatment best management practices, there are opportunities to promote infiltration and potentially meet pre-

construction runoff rates. Final numbers needed for this analysis won't be available until the final project design.

Note: Caltrans anticipates that it will not be possible to treat 100% of the runoff from this project; as a result the project was expanded to include treatment of runoff at Baillard Avenue, which is also within the Carpinteria Creek watershed.

California Coastal Commission

Comment 29 Water Quality - Vegetated Areas and Concrete Drainages

As noted above, design pollution prevention best management practices that are intended to filter runoff, maintain sheet flows to vegetated areas, and remove lining from existing concrete drainage channels will be incorporated into the project's design and quantified during the design phase of the project. See Section 2.2.2 (Potential Benefits) for more information.

California Coastal Commission

Comment 30 Water Quality - Romero and San Ysidro Creeks

As stated in your assessment, your comment is correct in determining that because we will not be able to treat 100% of the water quality features at each location, there will be impacts. However, as is standard with all Caltrans projects, the required best management practices will be implemented to the maximum extent feasible. Refer to the response for Comment 21 for further details regarding best management practices.

In terms of areas of the project where less treatment may occur, it should be noted that both Romero and San Ysidro creeks would have a portion of their creek lining removed as part of the project. This would provide a gain of 0.11 - 0.13 acre of unlined creek bed, which would provide benefit to critical steelhead trout habitat. Carpinteria Creek is not lined by concrete and is classified as critical habitat for steelhead trout. Any additional treatment

provided at Carpinteria Creek will be beneficial to steelhead trout. As we anticipate 100% of the water quality flows from this project will not be feasible to treat, this location was included to improve water quality wherever feasible within the limits of this project, although the increased benefit will target only Carpinteria Creek.

California Coastal Commission

Comment 31 Water Quality - Cumulative Impacts

Based on your comment, Section 2.5 (Cumulative Impacts) of the final environmental document was updated to include potential water quality impacts from the South Coast 101 HOV Lanes project along with several proposed projects in the U.S. 101 corridor in the Ventura to Santa Barbara region.

California Coastal Commission

Comment 32 Water Quality - Comparison of Alternatives

The preferred alternative adds less than 50% of the existing amount of impervious coverage. This information has been updated in Volume I, Section 2.2.2 (Water Quality) of the final environmental document. An Addendum to the Water Quality Assessment was prepared in April 2014 in response to your agency's comments on this topic. In addition to Section 2.2.2 being updated, information was added to Section 2.5 (Cumulative Impacts) in the final environmental document. Table 2.51 was added to provide impervious coverage information for the large watersheds located within the project. Table 2.26 also identifies locations for bio-swales and bio strips for some of the areas of the project.

As part of the Addendum to the Water Quality Assessment, a preliminary hydromodification analysis was done with impacts determined based on the project description, existing stream geometry and changes in flow. A detailed

hydromodification analysis will not be possible until the detailed project design is complete.

As for the types of design pollution prevention best management practices considered for detaining water onsite, promoting infiltration, and meeting post-construction runoff standards, they will be designed to maximize infiltration as much as feasible. Widening to the center leaves more room on the outside shoulders for placement of these types of best management practices; widening to the outside will leave less room. The preferred alternative is a hybrid where certain segments of the project widen to the outside shoulders and other segments widen to the inside median. Caltrans notes that the tentative Statewide Storm Water Permit was approved by the State Water Resources Control Board on September 19, 2012 and will take effect July 1, 2013.

California Coastal Commission

Comment 33 Air Quality

As mentioned in an earlier response, the HOV lanes proposal is one project in a larger consensus-approved package of improvements that came out of the Santa Barbara County Association of Governments-sponsored *101 In Motion* process (see Section 1.1, Background). This larger package, which has since been further funded through the Measure A local transportation sales tax measure and included as planned improvements in both the 2008 Regional Transportation Plan and the recently updated 2040 Regional Transportation Plan, provides a multimodal approach to long-term congestion relief in this corridor. In relation to the HOV project alternatives, the No-Build Alternative would result in decreased coastal access due to increased delays on U.S. 101, the main travel artery in the region. Pedestrians and bicycle traffic are prohibited on U.S. 101 in the project area. However, the project would maintain or improve any bicycle or pedestrian facilities on the local street system that would otherwise be directly affected by the project. Caltrans will

continue to coordinate with the City of Santa Barbara and Santa Barbara County Association of Governments in their endeavors to replace the existing railroad structure that is a deterrent to bicycle and pedestrian connectivity. Additionally, Caltrans will work with local partners and Coastal Commission staff during the Coastal Development Permit process to address any needed Local Coastal Plan Amendments.

California Coastal Commission

Comment 34 Biological Environment

Wetland and riparian impacts were broken out for each jurisdiction and are included below. Typically, this information is not broken down by jurisdiction in acres, but quantified for the entire project. As these numbers are refined during final design, they will be made available as part of the coastal development process.

Carpinteria (PM 1.4 to 4.59)

Resource Type	Alternative 1		Alternative 2		Alternative 3	
	Temp	Perm	Temp	Perm	Temp	Perm
Coastal Wetlands roadside drainage features	0.249	0.160	0.249	0.349	0.249	0.160
Creek beds (Franklin, Santa Monica)	0.182	0	0.182	0	0.182	0
Riparian	0	0	0	0	0	0

Toro Canyon (PM 4.59 – 7.1)

Resource Type	Alternative 1		Alternative 2		Alternative 3	
	Temp	Perm	Temp	Perm	Temp	Perm
Coastal Wetlands roadside drainage features	0.053	0.030	0.049	0.034	0.053	0.030
Creek bed (Arroyo Paredon, Toro Canyon)	0.152	0	0.152	0	0.152	0
Riparian	0.082	0	0.082	0	0.082	0

Summerland (PM 7.10- 8.87)

Resource Type	Alternative 1		Alternative 2		Alternative 3	
	Temp	Perm	Temp	Perm	Temp	Perm
Coastal Wetlands roadside drainage features	0	0	0	0	0	0
Creek bed (Greenwell)	0.006	0.042	0.006	0.042	0.006	0.042
Riparian	0.099	0.030	0.099	0.030	0.099	0.030

Montecito (PM 8.87 – 10.53)

Resource Type	Alternative 1		Alternative 2		Alternative 3	
	Temp	Perm	Temp	Perm	Temp	Perm
Coastal Wetlands roadside drainage features	0	0	0	0	0	0
Creek bed (Romero, San Ysidro, Oak)	0.074	0	0.074	0	0.074	0
Riparian	0.012	0	0.012	0	0.012	0

Santa Barbara (10.53- 12.3) – no impacts

California Coastal Commission

Comment 35 Biological Environment

Table 2.38 in the final environmental document (Section 2.3.2) contains riparian vegetation impacts for each creek. Toro and Greenwell creeks are the only creeks where rock slope protection is proposed.

California Coastal Commission

Comment 36 Biological Environment

Table 2.39 of the final environmental document includes information that reflects all impacts to wetlands that meet the Coastal Commission's single-parameter wetland definition. Coastal wetland buffer encroachment data will be supplied as part of the Local Coastal Plan Amendment process needed for both the City of Carpinteria and Santa Barbara County, which are separate actions. Caltrans is already working with the City of Carpinteria on the Local Coastal Plan Amendment. The process will also be initiated with Santa Barbara County in the near future.

Caltrans will mitigate impacts to coastal wetlands using a 3:1 ratio. This ratio is suitable based on the poor-quality condition of the wetlands, which are constructed roadside drainage ditches that are routinely disturbed. They serve the function of filtering highway runoff, but provide little wildlife habitat. The 3:1 mitigation ratio is consistent with what was proposed by Caltrans for the Linden Avenue and Casitas Interchanges Improvement project.

California Coastal Commission

Comment 37 Biological Environment

The Wetland Delineation Study is part of the project's Natural Environment Study. We apologize if the appendices were not part of your original copy. The Natural Environment Study and other technical studies were made available on the public information website along with the draft environmental document beginning in March 2012. This information is still

available online at the time of this writing. An addendum to the Natural Environment Study was prepared in April 2014 which includes updated wetland impacts. Please refer to Section 2.3.2 of the final environmental document. Caltrans can also provide a hard copy of the Natural Environment Study with mapping by mail, if requested. Requests for hard copies of technical studies can be made to Jason Wilkinson, Senior Environmental Planner, at (805) 542-4663 or by email to Jason_Wilkinson@dot.ca.gov.

California Coastal Commission

Comment 38 Biological Environment

Caltrans has reviewed the areas against the standards in the applicable local coastal plans. None of the areas where oak trees are to be removed would be considered oak woodland under the local coastal plan standards of review.

California Coastal Commission

Comment 39 Biological Environment

In response to your comment and the need to provide National Oceanic and Atmospheric Administration (NOAA) Fisheries with further details as they relate to steelhead trout, Section 2.3.4 was revised and contains added information related to extending the bridge structures and potential impacts to habitat. Please refer to the revised discussion in Section 2.3.4 of the final environmental document and Appendix H, which contains a copy of the Biological Opinion issued by NOAA Fisheries.

California Coastal Commission

Comment 40 Biological Environment

The proposed bridges at Romero, San Ysidro and Oak creeks will be partially blocked with concrete false walls at the existing abutment locations to maintain existing capacities and flow properties until flow capacity improvements can be made by others up and downstream.

The proposed work at the Arroyo Paredon Creek Bridge has changed since the draft environmental document was released as a result of coordination with the National Oceanic and Atmospheric Administration Fisheries relative to fish passage. There are two existing freeway bridges crossing Arroyo Paredon Creek at U.S. 101, one each for the southbound and northbound lanes. Each bridge is a one span structure separated by a gap of about 40 feet. These two structures can accommodate about half the flow of a 25-year storm event. The description of work for the Arroyo Paredon Creek Bridge was updated in the final environmental document: The replacement bridge would be longer and have two spans and double the hydraulic capacity compared to the existing bridges. Due to adjacent development constraints, the 100-year flow cannot be accommodated at this location. Therefore, the Santa Barbara County Flood Control Agency has agreed to conveyance of close to a 25-year flood flow. Due to existing stream channel capacity restrictions including smaller capacity bridges upstream and downstream of the U.S. 101 bridge, the channel cannot contain a 25-year flow either. Santa Barbara County Flood Control has no imminent plans to improve capacity at this creek. Therefore, to prevent exacerbating the current flooding patterns with higher capacity flood flow passage of the new bridge, one of the proposed spans would be temporarily blocked off. This will allow the new bridge to maintain the existing storm flow passage until future channel and bridge capacity improvements can be made by Santa Barbara County Flood Control, Santa Barbara County and Union Pacific Railroad. At that time Caltrans would open the second span. The walls would be placed to maintain current channel alignment in addition to current capacity to avoid straightening any existing sections of the creek.

California Coastal Commission

Comment 41 Fish Passage

Velocities at the highway bridges are slower than or equivalent to those at adjacent locations upstream and downstream. Channel widening at Arroyo Paredon Creek improves conditions by lowering velocities at peak flows and

improving conditions for migrating steelhead trout. Caltrans has considered adding features such as boulders or weirs to provide additional velocity shelters and flow complexity in the creeks. These features would also increase roughness and raise water surface elevations. Romero and San Ysidro creeks are prone to severe flooding, and Federal Emergency Management Agency regulations prohibit any increase to their water surface elevations. The creeks cannot currently be widened at the highway as a way to counter increased roughness because resulting hydraulic and geomorphic disturbances could threaten adjacent facilities.

Fixing velocities in these reaches requires addressing the broader channel because these creeks are modified throughout their lower reaches. Santa Barbara County Flood Control has a long-range conceptual plan to widen the lower channel reaches at these creeks to increase capacity, though no timeline has been identified. Within the State right-of-way, Caltrans is planning to replace the highway bridges with larger structures at an additional cost of \$6.5 million. This commitment provides the best practicable solution to velocity issues at these locations at the current time, given the existing constraints upstream and downstream. Constraints include the fact that there are railroad bridges, which are part of a critical transportation infrastructure, and there are portions of the creeks that are privately owned. The new highway structures will allow future creek widening that is compatible with Santa Barbara County's long-range conceptual plan to widen the lower channel reaches to allow increased capacity and decreased velocities. By investing in larger highway bridges, Caltrans is actively supporting and contributing to the regional goal of improving these lower creek reaches when the downstream conditions allow. When Santa Barbara County achieves its goals of improving creek capacities throughout these reaches of concern, false walls can be removed and highway bridges can be fully used. Caltrans will assist and cooperate with the County in this effort to help ensure the success of future alignments. In addition to building larger bridge structures as part of

a long-term solution to address velocity issues in these creeks, Caltrans is working with state and federal agencies to provide enhancements within the corridor that would promote species recovery in the near term.

California Coastal Commission

Comment 42 Avoidance, Minimization, and Mitigation Measures

Mitigation ratios can differ between projects to account for different baseline situations and for anticipated survivorship of proposed mitigation planting. Because the trees along the highway right-of-way are landscaped plantings in an urban setting, Caltrans is proposing ratios that are consistent with the Santa Barbara County urban oak tree guidelines (2007). These mitigation ratios are based on tree plantings that will be part of a detailed landscaping project with a defined plant establishment period that will include irrigation, weeding, and a maintenance regime that will ensure high rates of survival.

It is Caltrans' intent to revegetate all areas where riparian vegetation has been temporarily disturbed or removed due to construction activities using native species that are appropriate for riparian habitat area. Caltrans agrees that all non-native, invasive plant species should be removed from the revegetated areas.

California Coastal Commission

Comment 43 Avoidance, Minimization, and Mitigation Measures

Language has been updated in Section 2.3.1 of the final environmental document as follows: "Where feasible, fencing shall be installed at least 5 feet from the drip line of trees to be protected."

California Coastal Commission

Comment 44 Avoidance, Minimization, and Mitigation Measures

The final environmental document includes Table 2.39 that reflects all wetlands that meet the Coastal Commission's single-parameter wetland

definition (Section 30121 of Coastal Act), which is "lands within the coastal zone which may be covered periodically or permanently with shallow water and include saltwater marshes, freshwater marshes, open or closed brackish water marshes, swamps, mudflats, and fens."

Caltrans will mitigate impacts to coastal wetlands using a 3:1 ratio. This ratio is suitable based on the poor-quality condition of the wetlands, which are constructed roadside drainage ditches that are routinely disturbed. They serve the function of filtering highway runoff, but provide little wildlife habitat. The 3:1 mitigation ratio is consistent with what was proposed by Caltrans for the Linden Avenue and Casitas Interchanges Improvement project. As noted previously, Coastal Development Permits will be obtained from three jurisdictions: City of Santa Barbara, City of Carpinteria, and County of Santa Barbara.

California Coastal Commission

Comment 45 Design Alternatives

The additional width of the proposed bridge structures is to accommodate the proposed engineering features associated with the HOV project, such as pavement widening and construction of soundwalls. With regard to structure size, all of the bridges are being replaced to pass more flow to meet County Flood Control standards to alleviate floodplain impacts to the extent possible. However, the full capacity of the bridges cannot be used until channel constraints upstream and downstream of the Caltrans right-of-way are upgraded. Planted rock slope protection has been recommended only in locations warranted by high velocities. Use of rock slope protection has been minimized to the greatest extent possible and is currently only proposed at both Greenwell and Toro creeks.

California Coastal Commission

Comment 46 Construction Impacts

As stated in Volume I of the final environmental document in Sections 2.3.2 and 2.3.4, design details are not yet available to quantify temporary construction impacts for vehicle access or whether there will be a need for temporary fill material to access creek areas. Water diversions would be required at Arroyo Paredon, San Ysidro, and Romero Creeks. Several of the other creeks may also require stream diversions depending on how much rainfall occurs during the rainy season preceding construction. Dewatering methods typically used for Caltrans projects include diverting the creek water from the construction limits using a pipe to send the water downstream to a section of creek outside the construction area. Pumping may also be used if necessary with specific measures added in the creeks where steelhead trout and/or tidewater gobies can be found. During the design phase of the project dewatering and diversion plans would be developed and submitted to the appropriate regulatory agencies for review.

Measures to protect nesting birds were also added to Section 2.3.3 (Animal Species) of the final environmental document.

California Coastal Commission

Comment 47 Construction Impacts

Refer to Table 2.39 in the final environmental document for temporary impacts to existing wetlands. The temporary disturbances would result from construction-related activities including equipment access; vegetation removal; excavation and grading for new structures; and temporary water diversions. Impacts to coastal wetland buffers are being addressed as part of the Local Coastal Plan Amendment processes for the City of Carpinteria (in progress) and the County of Santa Barbara (not yet initiated).

California Coastal Commission

Comment 48 Construction Impacts - Noise

No adverse impacts from construction are anticipated because construction would be done in accordance with the Federal noise standards and the Caltrans Noise Protocol. Construction noise impacts would be short term, intermittent, and dominated by local traffic noise. Caltrans understands that local standards may differ from state and federal standards. As a state agency we are obligated to maintain consistency in applying state and federal standards equally across the state. When there is an inconsistency between state and local standards, state standards are followed.

California Coastal Commission

Comment 49 Cumulative Impacts

The document presents both the California Environmental Quality Act and National Environmental Policy Act definition of cumulative impacts. Section 2.5 (Cumulative Impacts, *Regulatory Setting*) begins with: Cumulative impacts are those that result from past, present, and reasonably foreseeable future actions, combined with the potential impacts of this project. A cumulative effect assessment looks at the collective impacts posed by individually minor, but collectively substantial impacts taking place over a period of time. The draft environmental document also referred the reader to Section 15355 of the California Environmental Quality Act Guidelines where the following legal definition of cumulative impacts is found.

The California Environmental Quality Act Guidelines defines cumulative impacts as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.(a) The individual effects may be changes resulting from a single project or a number of separate projects.(b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past,

present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.”

The Code of Federal Regulations Section 1508.7 defines a cumulative impact as the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

The comment is correct that the draft environmental document identified only visual resources as a significant cumulative impact. Although visual resources remain the only significant cumulative impact, refer to an expanded discussion in Section 2.5 of the final environmental document. The following topics were added to this section: transportation, traffic and bike/pedestrian; water quality impacts; and biological resources.

Cumulative water quality impacts have been quantified for the larger watersheds and were added to Section 2.5 (Cumulative Impacts) of the final environmental document. The proposed changes to impervious surfaces have been compared to the existing impervious surfaces in each identified watershed. As seen in the data, the percentage of increased impervious surfaces within the State right-of-way is relatively minor compared to the total impervious surface area within a watershed, especially an urbanized watershed such as those that exist with this project. Once design is well underway, a complete inventory of design pollution prevention best management practices, a thorough hydromodification analysis, and permanent storm water treatment best management practices design will occur as required by the Caltrans Project Planning and Design Guide.

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July 11, 2012

Mr. Matt Fowler, Senior Environmental Planner
Environmental Analysis
Department of Transportation, District 5
50 Higuera Street
San Luis Obispo, CA 93401

RE: Draft Environmental Impact Report for the South Coast 101 HOV Lanes Project

Dear Mr. Fowler,

The California Transportation Commission, as a Responsible Agency, received the Draft Environmental Impact Report (DEIR) for the South Coast 101 HOV Lanes Project that would construct high occupancy vehicle (HOV) lanes on U.S. 101 from 0.2 miles south of Ballard Avenue in the City of Carpinteria to Sycamore Creek in the City of Santa Barbara. It is our understanding that the project will be funded through a combination of State Transportation Improvement (STIP) and local funds. The estimated project cost ranges from \$270 million to \$355 million, depending on the alternative selected.

The Commission has no comments regarding the environmental issues to be addressed in the DEIR. However, since consideration of the environmental impacts of a project are required prior to the Commission's allocation of funds for design, right of way or construction activities as well as for new public road connections and route adoptions, notification should be provided to the Commission, as a Responsible Agency, upon completion of the environmental process.

The project has three build alternatives and a No-Build alternative being considered. The project costs for each build alternative will vary and depend on which configuration is selected for the Cabrillo Boulevard Interchange. The Cabrillo Boulevard interchange would be rebuilt under all three build alternatives. There are five mutually exclusive interchange configurations—F, F Modified, J, M, and M Modified—being considered under each of the three build alternatives.

The Commission has concerns with two of the five interchange configurations. Configuration F and F Modified would require the destruction of recently constructed improvements on US 101 at the Cabrillo Boulevard Interchange (Milpas to Hot Springs 101 Operational Improvements, construction completed Spring 2012). Although, the Commission supports mobility improvement along the Route

101 corridor, any interchange configuration that would obliterate recently completed transportation improvements at the Cabrillo Boulevard Interchange would run counter to the Commission's funding responsibilities and stewardship of transportation dollars.

In addition, prior to the Commission's action to approve the project for future consideration of funding, the Commission expects the lead and/or implementing agency to provide written assurance whether the selected alternative identified in the final environmental document is or is not consistent with the project programmed by the Commission and included in the Regional Transportation Plan. In the absence of such assurance of consistency, it may be assumed that the project is not consistent and Commission staff will base its recommendations to the Commission on that fact. The Commission may deny funding to a project which is no longer eligible for funding due to scope modification or other reasons.

If you have any questions, please contact Kandra Hester at (916) 653-7121.

Sincerely,

A handwritten signature in blue ink that reads "Bimla G. Rhinehart".

BIMLA G. RHINEHART
Executive Director

c: Jay Norvell, Chief, Caltrans Environmental Analysis
Kurt Scherzinger, Acting Chief, Caltrans Programming

California Transportation Commission

Comment 1 Interchange Configurations

The two referenced configurations do require the reconstruction of the southbound lanes in the approach areas to a proposed relocated undercrossing structure. The area is approximately 1,500 feet long and will relocate the added southbound lane constructed with the Milpas to Hot Springs Operational Improvements project. While this single lane would be protected in place with the other three proposed configurations (Configurations J, M, and M Modified), those configurations' estimated interchange construction costs are significantly higher. It is also important to note this project is not proposing to remove a new structure. The southbound mainline structure is nearly 60 years old. The Milpas to Hot Springs Operational Improvement Project modified a bridge rail on this structure, but did not provide a new structure at this location. Configurations F and F Modified are estimated to have an interchange construction cost of \$40 million and \$45 million, respectively; Configurations J, M and M Modified are estimated to have a construction cost of \$80 million, \$90 million, and \$90 million, respectively. In other words, reconstruction of the 1,500-foot-long recently built lane could save \$40 million to \$50 million.

STATE OF CALIFORNIA

Edmund G. Brown, Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
ds_nahc@pacbell.net



May 16, 2012

Ms. Yvonne Hoffman

California Department of Transportation – District 5

50 Higuera Street
San Luis Obispo, CA 93401

Re: SCH#2009051018; Joint NEPA/CEQA Notice; draft Environmental Impact Report (DEIR) and draft Environmental Assessment (EA) for the "South Coast 101 HOV Lanes Project," located for approximately ten miles from the City of Carpinteria to the Communities of Summerland and Montecito in Santa Barbara County, California.

Dear Ms. Hoffman:

The Native American Heritage Commission (NAHC), the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3rd 604).

This letter includes state and federal statutes relating to Native American historic properties of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9.

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendments effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ...objects of historic or aesthetic significance.' In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE)', and if so, to mitigate that effect. The NAHC did conduct a Sacred Lands File (SLF) search within the 'area of potential effect (APE)' with the following results: Native American cultural resources were not found within the APE. However, the absence of archaeological resources does not preclude their existence at the subsurface level and may be exposed during construction activity.

The NAHC 'Sacred Sites,' as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r).

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway.

Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the attached list of Native American contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Pursuant to CA Public Resources Code § 5097.95, the NAHC requests cooperation from other public agencies in order that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties. The NAHC recommends *avoidance* as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and Section 2183.2 that requires documentation, data recovery of cultural resources.

Furthermore, the NAHC if the proposed project is under the jurisdiction of the statutes and regulations of the National Environmental Policy Act (e.g. NEPA; 42 U.S.C. 4321-43351). Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 *et seq.*), 36 CFR Part 800.3 (f) (2) & 5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 *et seq.* and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's *Standards* include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.'

Confidentiality of "historic properties of religious and cultural significance" should also be considered as protected by California Government Code §6254(r) and may also be protected under Section 304 of the NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibly threatened by proposed project activity.

Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for inadvertent discovery of human remains mandate the processes to be followed in the event of a discovery of human remains in a project location other than a 'dedicated cemetery'.

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

Finally, when Native American cultural sites and/or Native American burial sites are prevalent within the project site, the NAHC recommends 'avoidance' of the site as referenced by CEQA Guidelines Section 15370(a).

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,

Dave Singleton
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List

Native American Contacts
Santa Barbara, County
May 16, 2012

Ernestine DeSoto
1311 Salinas Place # 5
Santa Barbara CA 93101
805-636-3963

Chumash

Patrick Tumamait
992 El Camino Corto
Ojai , CA 93023
(805) 640-0481
(805) 216-1253 Cell

Chumash

Beverly Salazar Folkes
1931 Shadybrook Drive
Thousand Oaks, CA 91362
folkes@msn.com
805 492-7255
(805) 558-1154 - cell

Chumash
Tataviam
Fernandeño

San Luis Obispo County Chumash Council
Chief Mark Steven Vigil
1030 Ritchie Road
Grover Beach CA 93433
(805) 481-2461
(805) 474-4729 -,Fax

Chumash

Santa Ynez Band of Mission Indians
Vincent Armenta, Chairperson
P.O. Box 517
Santa Ynez , CA 93460
varmenta@santaynezchumash.
(805) 688-7997
(805) 686-9578 Fax

Chumash

John Ruiz
1826 Stanwood Drive
Santa Barbara CA 93103
(805) 965-8983

Chumash

Barbareno/Ventureno Band of Mission Indians
Julie Lynn Tumamait-Stennsle, Chairwoman
365 North Poli Ave
Ojai , CA 93023
jtumamait@sbcglobal.net
(805) 646-6214

Chumash

Gilbert M. Unzueta Jr.
571 Citation Way
Thousand Oaks, CA 91320
uhuffle@aol.com
(805) 375-7229

Chumash

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2009051018; Joint NEPA-CEQA document; draft Environmental Impact Report and draft Environmental Assessment (DEIR/EA) for the South Coast 101 HOV Lanes Project; located in Santa Barbara County, California.

Appendix M • Response to Comments

Native American Contacts Santa Barbara, County May 16, 2012		
Stephen William Miller 189 Cartagena Camarillo , CA 93010 (805) 484-2439	Chumash	Charles S. Parra P.O. Box 6612 Oxnard , CA 93031 (805) 340-3134 (Cell) (805) 488-0481 (Home)
Santa Ynez Tribal Elders Council Adelina Alva-Padilla, Chair Woman P.O. Box 365 Santa Ynez , CA 93460 elders@santaynezchumash.org (805) 688-8446 (805) 693-1768 FAX	Chumash	Richard Angulo 2513 Laney Circle Denton , TX 76208
Randy Guzman - Folkes 6471 Cornell Circle Moorpark , CA 93021 ndnRandy@yahoo.com (805) 905-1675 - cell	Chumash Fernandefio Tataviam Shoshone Paiute Yaqui	Santa Ynez Band of Mission Indians Tribal Administrator P.O. Box 517 Santa Ynez , CA 93460 info@santaynezchumash. (805) 688-7997 (805) 686-9578 Fax
Coastal Band of the Chumash Nation Toni Cordero, Chairwoman P.O. Box 4464 Santa Barbara CA 93140 cordero44@charter.net 805-964-3447	Chumash	Carol A. Pulido 165 Mountainview Street Oak View , CA 93022 805-649-2743 (Home)
This list is current only as of the date of this document.		
Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.58 of the Public Resources Code.		
This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2009051018; Joint NEPA-CEQA document; draft Environmental Impact Report and draft Environmental Assessment (DEIR/EA) for the South Coast 101 HOV Lanes Project; located in Santa Barbara County, California.		

Native American Contacts Santa Barbara, County May 16, 2012		
Melissa M. Parra-Hernandez 119 North Balsam Street Oxnard , CA 93030 envyy36@yahoo.com 805-983-7964 (805) 248-8463 cell	Chumash	Barbareno/Ventureno Band of Mission Indians Kathleen Pappo 2762 Vista Mesa Drive Rancho Palos Verdes CA 90275 310-831-5295
Frank Arredondo PO Box 161 Santa Barbara Ca 93102 ksen_sku_mu@yahoo.com 805-617-6884 ksen_sku_mu@yahoo.com	Chumash	Barbareno/Ventureno Band of Mission Indians Raudel Joe Banuelos, Jr. 331 Mira Flores Court Camarillo , CA 93012 805-987-5314
Santa Ynez Tribal Elders Council Freddie Romero, Cultural Preservation Consint P.O. Box 365 Santa Ynez , CA 93460 freddyromero1959@yahoo. 805-688-7997, Ext 37	Chumash	
Aylisha Diane Marie Garcia Napoleone 33054 Decker School Road Malibu , CA 90265	Chumash	
This list is current only as of the date of this document.		
Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.58 of the Public Resources Code.		
This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2009051018; Joint NEPA-CEQA document; draft Environmental Impact Report and draft Environmental Assessment (DEIR/EA) for the South Coast 101 HOV Lanes Project; located in Santa Barbara County, California.		

Native American Heritage Commission

Comments 1 Cultural Process

Consultation with the Chumash in the project area has been an ongoing part of our mandated public participation process under both Section 106 of the National Historic Preservation Act and the California Environmental Quality Act. Each of the individuals on the list of Native American Contacts, provided to us by the Native American Heritage Commission (NAHC), has been part of the consultation process since our initial correspondence with the Native American Heritage Commission in July 2008. Consultation with all of the Chumash contacts provided by the Native American Heritage Commission has been carried out either directly by, or under the supervision of, our District Native American Coordinator.

Native American Heritage Commission

Comment 2 Tribal Consultation

Chapter 4 (Comments and Coordination) of this final environmental document provides a chronology of Chumash consultation and coordination carried out in connection with the South Coast 101 HOV Lanes project.

Native American Heritage Commission

Comment 3 Confidentiality of Resources

Caltrans recognizes and respects the confidentiality of historic properties of religious and cultural significance. Specific locational information concerning the Via Real Redeposited Midden has been redacted from public documents.

Native American Heritage Commission

Comment 4 Tribal Consultation

Please see responses to Comments 1 and 2 above.

Local Government Agencies

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CITY of CARPINTERIA CALIFORNIA



June 25, 2012

Matt Fowler
Senior Environmental Planner
Department of Transportation, District 5
50 Higuera Street
San Luis Obispo, CA 93401

Re: South Coast 101 HOV Lanes Project DEIR/EA Comments
SCH# 2009051018

Dear Mr. Fowler:

The City of Carpinteria has received the Draft Environmental Impact Report/Environmental Assessment dated March 2012 for the construction of the US 101 High Occupancy Vehicle (HOV) Lanes Project. We appreciate the opportunity to review this environmental document and offer the following comments. As a portion of the project area is located within the City and within the coastal zone, a Conditional Use Permit and a Coastal Development Permit from the City are required. We have focused our comments on the segment of the project within our City boundary, as well as on our concerns regarding the required Local Coastal Program Amendment to address the project's conflict with wetland protection policies in the City of Carpinteria and County of Santa Barbara.

We begin by providing general comments on the document overall, and then proceed with specific comments indexed to document chapters and page numbers.

General Comments (Entire Document)

The summary discussion of the document (Page xi) correctly identifies that the South Coast 101 HOV Lanes Project would necessitate an Amendment to the Local Coastal Programs (LCP) of the City of Carpinteria and County of Santa Barbara. In the absence of such an Amendment to the City's Local Coastal Program, the project would be inconsistent with existing resource protection policies related to wetlands. California Coastal Commission staff has indicated that potential project impacts to coastal wetlands would run counter to policies contained in the California Coastal Act, and that extraordinary benefits of the project in other areas such as enhanced public access to coastal resources would need to be brought into the consideration of whether to approve an LCP Amendment and the project itself. On balance, the proposed LCP Amendment must be most protective of all coastal resources.

With respect to the "Coordination with Other Agencies" discussion on Page xi, the California Coastal Commission (CCC) should be identified in a separate bulleted discussion. NEPA must address a proposed action's consistency with the Coastal Zone Management Act, which in California means compliance with the California Coastal Act. The referenced Amendment to the

1

South Coast 101 HOV Lanes DEIR/EA Comments
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Page 2

Carpinteria LCP is deemed necessary in order to achieve the certification necessary for satisfaction of the CZMA.

With regard to the foregoing discussion, it would be helpful for the DEIR to provide greater detail as to the specific ways in which the proposal itself would enhance public access to coastal resources in a regionally important manner. Opportunities for the project to accommodate connections or gap closures in pedestrian or bicycle facilities serving coastal areas should be identified, and where possible, included in the project description itself as bona fide benefit that can be ascribed to the proposal.

2

Given that the entire City of Carpinteria portion of the project lies within the Coastal Zone, and noting that an LCP Amendment is necessary, the CCC will necessarily be involved in the review of the Amendment request. The standard of review for project impacts on coastal resources, including efforts for avoidance and mitigation, is therefore the Coastal Act. Consultation with CCC staff to confirm the standards to be applied for mitigation would be advisable, in order to avoid potential understatement of such requirements in the environmental document. This effort should be conducted in cooperation with the City.

Chapter 1 – Proposed Project

1.1 Introduction

It would be helpful for this section to provide more detail on the part-time nature of the proposed HOV Lanes. Please provide more information about how a managed lane works once it is constructed in terms of how and when traffic counts are done over time to determine when to limit use of the lane to vehicles containing two or more passengers and when the lane use is unrestricted. What is a typical time-frame for the number and time of the weekday peak traffic hours when the facility would be limited to carpool use?

3

Is this proposal the first of other lane additions that could be added to Highway 101 in the region? Carpinteria residents have expressed concern that future expansion may be proposed rather than addressing other options to move people and goods through the corridor, such as rail and transit.

4

1.3.1 Build Alternatives

Page 15, Second to last bullet: Provide median landscaping from 0.4 mile south of Carpinteria Creek to 0.3 mile south north of Carpinteria Creek (this is the only location where median planting is the same for all alternatives).

5

Page 16, Alternative 1, Final Bullet: Would the proposed retaining wall along the southbound shoulder right-of-way preclude an alternative which extends Santa Claus Lane as a bike/pedestrian path to connect to the northern terminus of Carpinteria Avenue?

6

1.4 Permits and Approvals Needed

Table 1.4 Permits and Approval Required for Proposed Project
Coastal Development Permit and Conditional Use Permit needed from the City of Carpinteria.

7

South Coast 101 HOV Lanes DEIR/EA Comments
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Page 3

A separate entry should be included for California Coastal Commission; the Permit/Approval would be Local Coastal Plan Amendment, Carpinteria and County of Santa Barbara; Status could be Early Consultation has occurred, LCP Amendment request to be submitted during design phase.

7

Chapter 2 – Affected Environment, Environmental Consequences, and Avoidance, Minimization, and/or Mitigation

2.1, page 34

Venco should be Venoco

8

Table 2.1, page 39

Remove Bega and Clippinger from list of Proposed Development
Include Dahlia Court 33 apartments and Casas de las Flores 44 apartments

2.1.1.2 Consistency with State, Regional and Local Plans – Environmental Consequences Last Paragraph, page 49

A Conditional Use Permit is also required in addition to the Coastal Development Permit

9

2.1.1.3 Coastal Zone

Avoidance, Minimization, and/or Mitigation Measures, page 52
Same comment regarding CUP requirement

2.1.1.4 Parks and Recreation

Affected Environment, page 53
Include reference to Bluff's Nature Preserve and Viola Fields, Farmer Parcel Open Space

10

Table 2.3, Park and Recreational Facilities

Add items 12 and 13 to Carpinteria's list: Bluff's Nature Preserve and Viola Fields, Farmer Parcel Open Space

2.1.5 Traffic and Transportation/Pedestrian and Bicycle Facilities Affected Environment, page 88, Bulleted Items Mid-page

Three measures are used to assess mainline traffic operations for the project. The first metric, peak period and total daily delay (vehicle and person hours) is not common to the general public, and is not well explained in this section of the report. A description of how vehicle and person hour delays are calculated, using non-complex terminology, would assist the reader to grasp these concepts. For instance, vehicle delay could be described as the difference in the amount of time required for a vehicle to travel the distance of the corridor during a period of congestion, compared to the time this same trip requires at the posted speed limit. The number of minutes of delay per vehicle is then multiplied by the number of vehicles making the trip under congested conditions, to render total hours of vehicle delay (peak hour and daily). A similar explanation for the person hours would also be helpful.

11

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Bicycle and Pedestrian Routes, page 107, second paragraph under heading.

The discussion indicates that local agencies desire bicycle and pedestrian improvements within the project limits. Two such facilities are of particular interest to the City of Carpinteria and include a Class I bikepath/pedestrian trail to connect Santa Claus Lane to Carpinteria Avenue on the west end of the City and a Class I bikepath/pedestrian trail to connect Carpinteria Avenue at Highway 150 to Rincon County Beach Park.

The City encourages Caltrans to include within the discussion of project alternatives establishing a bike and pedestrian trail from the eastern terminus of Santa Claus Lane to connect with the western terminus of Carpinteria Avenue.

For the Carpinteria Rincon Trail Project, the City released for public review on June 7, 2012 a Draft Mitigated Negative Declaration for this trail, thus advancing this proposal as a potential means to enhance the connectivity of regional bike and pedestrian facilities within the project corridor. There is currently no funding source identified nor have permit applications been made.

With regard to these improvements identified by the City, CCC staff have indicated that enhancing public access to coastal resources must be demonstrated by the proposed project, in order to balance against impacts upon coastal resources including wetlands. It would therefore be helpful for the DEIR to provide greater detail as to the specific ways in which the proposal itself would enhance public access to coastal resources in a regionally important manner, particularly with regard to alternative transportation modes that also serve the goal of decreasing greenhouse gas emissions from conventional transportation means. Opportunities for the project to accommodate connections or gap closures in pedestrian or bicycle facilities serving coastal areas should be identified, and where possible, included in the project description itself as bona fide benefits that can be ascribed to the proposal.

2.1.6 Visual/Aesthetics

Carpinteria City Unit

The paragraph indicates that "Carpinteria has limited to no views of the Pacific Ocean." Views to the ocean are available to Highway 101 travelers in the Bailard Avenue region across the Bluffs Nature Preserve and Viola Fields open space areas.

Carpinteria Salt Marsh Unit

The description should note that northbound travelers on US 101 enjoy expansive views of the Pacific Ocean across the Carpinteria Salt Marsh through this unit.

What is the standard height of the proposed median barrier? Is this height sufficient to shield vehicle headlights and the potential glare effect from vehicles traveling in the opposite direction in locations where no median landscape planting is proposed? What are the standard and minimum widths of a median barrier that includes landscape planting?

12

13

South Coast 101 HOV Lanes DEIR/EA Comments
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Page 5

2.1.7 Cultural Resources

Page 226, Avoidance, Minimization, and/or Mitigation Measures, First Bullet
Care should be taken to ensure the fencing erected to establish the Environmentally Sensitive Area associated with cultural resource deposits on Via Real is not in any manner labeled to indicate to the public the presence of cultural resource materials. The potential for unlawful search and removal of artifacts could be associated with signage indicating the purpose of the exclusionary fencing.

14

2.2 Physical Environment

2.2.1 Hydrology and Floodplain, Affected Environment

What if the Linden Avenue – Casitas Pass Road Interchanges Project is delayed or denied? What are the impacts to the floodplain at Carpinteria Creek? Would this also have downstream effects at Franklin Creek? This seems to be a reasonable worst-case scenario that should be evaluated in this document.

15

2.2.2 Water Quality and Stormwater Runoff

State Water Resources Control Board and Regional Water Quality Control Boards

Page 235, paragraph 4: Municipal Separate Storm Sewer System Program

This paragraph has a typo in the first sentence: country should be county.

16

Carpinteria Creek, page 238

This section of the document indicates that the on-grade low-water bike/pedestrian crossing located in Carpinteria Creek would be removed as part of this project; however, in reviewing the Linden Avenue – Casitas Pass Road Project, the EIR for that project indicates that it will include realignment of the bike path and removal of the low-water crossing. Again, there is reference in the last bullet item of this discussion that the Linden Avenue – Casitas Pass Road project would construct several stormwater treatment best management plans. If that project does not move forward, how will this project address the impacts at Carpinteria Creek?

17

Avoidance, Minimization, and/or Mitigation Measures

Permanent Stormwater Treatment Best Management Practices, page 250

Using the area between US 101 southbound ramps and the frontage road (Carpinteria Avenue) as a bioswale or biostrip may have impacts to the existing vegetation and habitat in these locations. Has this been analyzed in the biological resources section of the document to evaluate the level of expected pollutants and what occurs with any accumulated contaminated runoff? These areas serve as foraging areas for white tailed kites and potential impacts to kite habitat should also be considered.

18

2.2.5 Hazardous Waste or Materials

Avoidance, Minimization, and/or Mitigation Measures, page 267

This paragraph indicates that reuse of soil contaminated with aerially deposited lead may be used. The Final EIR/EA must clarify whether the soil will be reused or not, and where. If this practice will occur within the City of Carpinteria, we want to ensure that all precautions are taken to reduce potential impacts to the maximum extent feasible.

19

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2.2.6 Air Quality

Environmental Consequences, Naturally Occurring Asbestos, page 282

The second sentence seems to be missing the word “miles” from the second sentence (line five).

20

Avoidance, Mitigation, and/or Mitigation Measures

Second bullet, page 283

This mitigation measure identifies that recycling and waste diversion techniques will be used to the extent feasible. The City is concerned about the reuse of soil containing aerially deposited lead in the vicinity of sensitive receptors. The document must clarify if and where this soil will be reused rather than exported to an appropriate disposal site.

21

PM₁₀ Measures, page 285

Bullet 2 inadvertently refers to “map recordation and finish grading for the structure.” As these are not aspects of the project, please correct this reference.

22

2.2.7 Noise

Please address the noise effects that may occur at residences that do not abut the freeway and how those property owners may be involved in the discussion regarding soundwalls. Also, a concern was raised that the noise measurements were not taken during the peak traffic periods and that perhaps noise impacts, even the existing condition, were understated. Please ensure that the document analyzes the reasonable worst case scenario in this regard, and that it includes the potential for noise impacts to affect residents on one side of the freeway when a soundwall is proposed only on the opposite side of the freeway. Is there a potential for a reflection of noise that could cause a significant effect?

23

Regulatory Setting

Full Paragraph, page 289

While the existing discussion indicates that one of the factors used in determining the reasonableness for implementing a noise abatement measure (including erection of a sound wall) is “residents’ acceptance,” a separate explanation of the sound wall voting process would benefit the reader. Members of the public might assume all the walls identified as reasonable will be constructed, whereas in fact it would require a majority vote of the property owners benefitted from a particular sound wall for the wall to be constructed. Consequently, many of the reasonable sound walls identified in the DEIR might not be constructed as part of the project.

24

Page 290

The document includes an evaluation of six segments of the corridor relative to noise impacts but it seems that a seventh segment addressing the noise-sensitive receptors between Carpinteria Creek and Franklin Creek (specifically including residences along Cameo Road, Via Real and Nipomo Drive) should be included.

25

Sheffield Drive to San Ysidro Road/Eucalyptus Lane

Page 291

Third sentence suggested corrections: There is an at-grade grade crossing at Posipilo Posilipo Lane...

26

South Coast 101 HOV Lanes DEIR/EA Comments
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Page 7

Receptor Group 2 (R4-R7A)

Page 303

Final sentence: Because the predicted future noise level exceeds the noise abatement criterion for residential uses (67 decibels), the homes represented by Receptors R4 through R7A ~~by these~~ receptors would be adversely affected by noise.

27

2.3 Biological Environment

Table 2.33 Riparian Impacts

First Column Heading

For clarity, the heading should be revised to: Number of Trees per Species

28

Coast Live Oaks

Initial paragraph, page 353

Second to last sentence: Although this section of right-of-way has the most terrestrial habitat value within the project limits, its habitat values are diminished by the presence of ornamental species and by the adjacent residential areas.

29

Avoidance, Minimization, and/or Mitigation Measures

Riparian (page 353), Coast Live Oaks (page 354)

The replacement ratio for native trees removed is identified as a maximum of 3:1, with a note that higher replacement ratios are sometimes appropriate, but that project-specific circumstances warrant this degree of replacement. In either this discussion, the discussion of biological resources in Section 3.2.2, or both, it should be noted that restoration or enhancement of native tree species above these ratios could be requested or required by the CCC in order to achieve, “on balance,” greater protection for coastal resources in association with the CCC consideration of necessary LCP Amendments for this project.

30

Avoidance, Minimization, and/or Mitigation Measures

Wetlands (page 383)

Compensatory areal mitigation for loss of wetlands is presented as a range from 1:1 up to 3:1. The project as proposed would be inconsistent with wetland protection policies of the Carpinteria LCP, thus necessitating an Amendment. In that the LCP Amendment directly involves wetland resources, it should be assumed that not less than the 3:1 replacement ratio would be acceptable to the City and the CCC. In either this discussion, the discussion of biological resources in Section 3.2.2, or both, it should be noted that compensatory mitigation for wetlands above these ratios could be requested or required by the City and the CCC in order to achieve, “on balance,” greater protection for coastal resources in association with the CCC’s consideration of necessary LCP Amendments for this project.

31

Page 384, first bulleted paragraph

Offsite mitigation is proposed in the Carpinteria Salt Marsh if full mitigation cannot occur within the Caltrans right-of-way. The City strongly supports actual wetland restoration by Caltrans in the same geographic region and would discourage any conversion of this approach to an in-lieu fee payment (contribution of funds to a mitigation project); simple contribution of mitigation funding

32

South Coast 101 HOV Lanes DEIR/EA Comments
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cannot guarantee the creation of the actual amount of wetland acreage necessary to offset the permanent impacts.

2.4 Construction Impacts PM₁₀ Measures, page 412

Bullet 2 indicates in the first sentence that gravel pads must be installed at all access points. However, the last sentence indicates that the placement of automatic wheel-washing equipment or gravel pads at all site exit points is recommended. Perhaps the second sentence was only intended to address the automatic wheel-washing equipment as a recommended measure? Please clarify.

2.5 Cumulative Impacts

Where is analysis of other cumulative impacts in addition to the cumulative analysis provided for aesthetics/visual resources? It seems there should be an analysis of cumulative noise impacts and cumulative biological resources impacts, and perhaps all other issue areas where there are identified project-specific impacts.

Table 2.4.3 Potential Cumulative Project List

Residential Projects should also include the Dahlia Court Apartments Expansion, 33 units, and Casas de las Flores Apartments, 44 units. Both are located within the City of Carpinteria. The Dahlia Court project is under construction and the Casas de las Flores project has received all of its approvals other than Building Permits.

Chapter 3 – California Environmental Quality Act Evaluation

3.2.1 Less than Significant Effects of the Proposed Project Noise, page 431

In the existing discussion, only one significance threshold is identified for determination of potential noise impacts under CEQA, “a significant impact occurs when the design year noise levels (20 years after construction of the project) increase by 12 or more decibels over existing noise levels”. However, the Initial Study Checklist in Appendix G of the CEQA Guidelines includes the following consideration.

Would the project result in:

- a) *Exposure of persons to the generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

Thus, under CEQA, it is important not only to examine absolute noise increases due to a project, but whether the resulting noise levels would be in excess of adopted standards. This discussion should be augmented with reference to the County of Santa Barbara and City of Carpinteria Noise Elements, which indicate that exterior noise exposure for residential land uses should not exceed 65 dBA CNEL.

This exterior noise criterion was adopted by local agencies to ensure that the interior noise criterion of 45 dBA CNEL for residences (California Noise Insulation Standards, Title 24, California Code of Regulations) can be achieved through normal construction methods and materials. Exterior noise levels substantially greater than 65 dBA CNEL could prohibit or hinder compliance with the State indoor

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criterion. Where noise abatement would not be provided for future project-related residential exterior noise levels exceeding 65 dBA CNEL, mitigation strategies to achieve compliance with the indoor criterion should be identified.

3.2.2 Significant Environmental Effects of the Proposed Project Cultural Resources, page 431, Second Paragraph


The discussion indicates that a draft memorandum of agreement will be submitted for review and comment at the same time the environmental document is in public circulation. The City of Carpinteria requests a copy of the referenced memorandum in order to understand the resolution of cultural resources impacts.

Biological Resources, page 432

This discussion should indicate the proposed project is currently inconsistent with the City of Carpinteria LCP policies protecting wetland resources. As such, an LCP Amendment will be required. It should also be noted that compensatory mitigation for wetlands alone may not be sufficient to resolve a policy conflict at the Coastal Act level, and other benefits of the project may need to be strongly demonstrated in order to achieve, “on balance,” greater protection for coastal resources in association with CCC consideration of a necessary LCP Amendment for this project.

Thank you again for the opportunity to comment on this environmental document. We look forward to continuing to work together on this important project to address regional traffic congestion through the South Coast area of Santa Barbara County.

Sincerely,


Al Clark
Mayor, City of Carpinteria

cc: Scott Eades, Project Manager

City of Carpinteria

General Response

Throughout the project development process, Caltrans seeks to adhere to and be consistent with the California Coastal Act and local coastal plans. Caltrans recognizes and appreciates the need for a Coastal Development Permit and Local Coastal Plan Amendments so that this project gains the necessary approvals. Amendments to the Local Coastal Plan for the City of Carpinteria are currently in process.

The fundamental purpose of the project is to relieve congestion on U.S. 101 in the project area. The result will be improved coastal access reaching over ten miles. This is a necessary and complex undertaking that preserves coastal access.

Through careful consideration of the current environment and thoughtful design, Caltrans has worked to tailor the project to avoid or minimize coastal impacts as much as possible. This has been achieved by extensively studying the project area, adjusting the pavement location in consideration of resources, and removing considered soundwalls from the project where they are not reasonable or feasible. Further along in this project's process, as Caltrans refines details, Caltrans staff will work with Santa Barbara County and the Cities of Carpinteria and Santa Barbara to address the requirements of the California Coastal Act.

Caltrans acknowledges that beyond the California Environmental Quality Act and National Environmental Policy Act processes, there will be continued dialog regarding what is required to meet the intent of the Coastal Act and the City's Local Coastal Plan.

City of Carpinteria

Comment 1 General Comments

Refer to the General Response above. A bullet was added to the Summary Section of the final environmental document to note that the project requires a Local Coastal Plan Amendment, which involves coordination with the City of Carpinteria and the Coastal Commission.

Information has been added to Chapter 4 to include an overview of any coordination with Coastal Commission staff that has occurred so far.

City of Carpinteria

Comment 2 Local Coastal Access

See the General Response for both Coastal Commission and City of Carpinteria.

The fundamental purpose of the project is to relieve congestion on U.S. 101 in the project area. The result will be improved coastal access reaching over ten miles. This is a necessary and complex undertaking that preserves coastal access.

City of Carpinteria

Comment 3 Project Introduction

Managed Lane is an operational practice used to address congestion by controlling traffic movement on the highway. A common approach to lane management is restricted use based on vehicle eligibility, which can be based on occupancy or vehicle type. A High-Occupancy Vehicle (HOV) lane also known as the carpool or diamond lane, is a traffic management strategy to promote and encourage ridesharing. An HOV lane is usually located on the inside (left) lane and is identified by signs along the freeway and white diamond symbols painted on the pavement. In Northern California, HOV lanes are only operational on Monday thru Friday during posted peak congestion

hours. To determine the hours for the part-time HOV operation, data collection was performed in April 2008. Data collected included freeway mainline counts; ramp counts; intersection turning movement counts; classification counts; vehicle occupancy counts; and speed surveys. The data collection period was characterized by fair weather with no observed vehicle incidents. These data establish the technical parameters used for operational analyses. The results of the study indicated that the most probable operating hours for the proposed HOV lanes would be weekdays (Monday -Friday) 6:00–9:00 a.m. and 3:00–6:00 p.m. The specific hours of operation for the HOV lanes within this corridor will be determined in the design phase in coordination with Caltrans District 7. The HOV lanes will operate as mixed-flow lanes during all other times (HOV Report, June 2010). Operating hours will be designated by signs within the project limits. The HOV hours of operation can be modified over time if necessary.

City of Carpinteria

Comment 4 Proposed Project Introduction

Due to environmental and right-of-way constraints, this proposal will likely be the only capital project that adds additional through lanes to U.S. 101 within the proposed project limits. Other possible lane additions that you are referring to would be in the form of auxiliary lanes (or merging lanes) that would connect on-ramps to off-ramps between interchanges. The South Coast 101 HOV Lanes Project fulfills the highway component of the Santa Barbara *101 In Motion* plan (refer to Chapter 1, background). Separate environmental documentation is required for rail improvements including the LOSSAN North Operational Improvements Program Level Environmental Impact Report/Environmental Assessment expected to be released in Fall 2014.

City of Carpinteria

Comment 5 Build Alternatives

After further analysis, the design engineer confirmed that the sentence is accurate and should be left as is in Section 1.3.1.

City of Carpinteria

Comment 6 Alternative 1

The Preferred project alternative, Alternative 1, has been modified in this area to add the lane in the median rather than the shoulder. As a result this alternative no longer requires a retaining wall in this location and will not preclude construction of a bike/pedestrian path between Santa Claus Lane and Carpinteria Avenue.

City of Carpinteria

Comment 7 Permits and Approvals Needed

This information has been updated in Section 2.1.1.2 and Table 1.4 of Volume I of this final environmental document.

City of Carpinteria

Comment 8 Existing and Future Land Use

The spelling of Venoco was corrected in Section 2.1.1.1 of Volume I of this final environmental document. Table 2.1 was updated to remove/add appropriate developments within the City of Carpinteria.

City of Carpinteria

Comment 9 Consistency with State, Regional, and Local Plans and Coastal Zone

In response to your comment, the following text was added to the final environmental document: In addition to a coastal development permit, the City of Carpinteria requires a Conditional Use Permit. This requirement was also added to measures in Section 2.1.1.3 of Volume I.

City of Carpinteria

Comment 10 Parks and Recreation

Table 2.3 and the Figure 2-3 were revised in the Section 2.1.1.4 of this final environmental document to include the Bluffs Nature Preserve and Viola Fields.

City of Carpinteria

Comment 11 Traffic and Transportation/Pedestrian and Bicycle Facilities

Section 2.1.5 was revised to better explain the three measures used to assess highway traffic operations. Your suggestion for describing vehicle delay was incorporated along with a better explanation for person hours.

City of Carpinteria

Comment 12 Bicycle and Pedestrian Routes

No improvements are proposed to pedestrian or bicycle facilities within the City of Carpinteria as part of this project since this is a highway widening project that is being built within the State right-of-way and is not negatively affecting bicycle routes. Any existing pedestrian or bicycle facilities near the Cabrillo Boulevard/Hot Springs Road interchange would be retained in their present configuration or improved. The benefit to cyclists and pedestrians comes from resulting congestion relief to local roads where these facilities exist.

Separate from the South Coast 101 HOV Lanes project is a coordinated effort by the Santa Barbara County Association of Governments and City of Carpinteria to build two trails deemed necessary as part of the local coastal plan amendment process; the Santa Claus Lane Bike Path is linked with the South Coast 101 HOV Lanes project, and the Rincon Coastal Trail is linked with the Linden and Casitas project. This information was updated in Section 2.1.5 of the final environmental document. Each of these paths will fill critical gaps

in the overall trail system. The combination of the two trails, the proposed project, and the remaining elements of *101 In Motion* would move Santa Barbara County closer to meeting the goals necessary to decrease the overall production of greenhouse gas emissions.

City of Carpinteria

Comment 13 Visual

Section 2.1.6 of this final environmental document was revised to acknowledge ocean visibility in the Bailard Avenue region across the Bluffs Nature Preserve and Viola Fields open space areas. Regarding the “Carpinteria Salt Marsh Unit,” the draft environmental document stated that “the visual identity of this unit is also greatly influenced by its proximity to the Carpinteria Salt Marsh.” Although views from northbound U.S. 101 to the salt marsh and ocean are partly obscured by existing roadside and median vegetation and highway traffic, Section 2.1.6 of the final environmental document was revised to acknowledge ocean visibility from this unit.

Caltrans is proposing concrete median barriers that vary in height from 32 inches to 56 inches above the high side of the adjacent paved surface. The height needs to be sufficient for shielding vehicle headlights and potential glare from vehicles traveling in the opposite direction in those areas where no median landscape planting is proposed. However, in areas where floodplains exist, concrete barriers will not be constructed since they would block the flow of floodwaters. In those cases, thrie beam barrier will be installed in the median instead. There are no standards for including median landscape planting because it requires a design exception to consider. Where medians are proposed for landscaping in the project, the width between the inside shoulders is mostly 8 feet wide. There is some limited ability to plant medians that are a little narrower, but the inside shoulders in those locations must be a standard width of 10 feet to allow room for maintenance activity staging.

City of Carpinteria

Comment 14 Cultural Resources

It is Caltrans policy not to identify the purpose of such exclusionary fencing.

City of Carpinteria

Comment 15 Hydrology and Floodplain

The Linden Avenue to Casitas Pass Road Interchanges project is an approved and funded project that is expected to move forward before construction of the South Coast 101 HOV Lanes project. The conditions associated with work to be done on Carpinteria Creek as part of the Linden-Casitas project are assumed to be in place before the start of the South Coast 101 HOV Lanes project. If the work associated with Linden-Casitas is delayed or denied, construction staging of the 101 HOV Lanes project may be revised to set improvements in Carpinteria as the final phase of the project rather than one of the first, to allow time to complete the Linden-Casitas effort. In the unlikely event that the Linden Avenue to Casitas Pass Road Interchanges project does not go to construction, the work at Carpinteria Creek would occur as part of the 101 HOV Lanes project. The environmental document would be updated with either a California Environmental Quality Act Addendum or Supplemental Environmental Impact Report, depending on the significance of potential impacts associated with the additional work at that time.

City of Carpinteria

Comment 16 Correction to Water Quality Section

The typo you refer to was corrected in the final environmental document.

City of Carpinteria

Comment 17 Water Quality and Stormwater Runoff

As indicated in the response to Comment 15, the work is scheduled to occur on Carpinteria Creek as part of the Linden Avenue to Casitas Pass Road Interchanges project. If the Linden Avenue to Casitas Pass Road Interchanges

project does not move forward, the work would be consolidated into the South Coast 101 HOV Lanes project. The additional work would require an Addendum or Supplemental Environmental Impact Report, depending on the potential environmental impacts at that time.

City of Carpinteria

Comment 18 Permanent Stormwater Treatment Best Management Practices

No best management practices treatment facilities, including bioswales or biostrips, are currently proposed at this location. Therefore, no impacts to biological resources are anticipated.

City of Carpinteria

Comment 19 Hazardous Waste or Materials

Language has been added to the final environmental document as follows: The aerially deposited lead-contaminated soil may be used in the construction of new on-ramps and off-ramps or for the widening of fill sections. As noted, any reuse of this material would be in accordance with the conditions of the Department of Toxic Substances variance (described below).

With regard to potential impacts of the variance, in June 2009, the Department of Toxic Substances Control adopted a Negative Declaration under the California Environmental Quality Act documenting that the proposed actions and implementation of the variance for the reuse of aerially deposited lead-containing soils within the State right-of-way will not present a significant threat to human health or the environment. Public notice was provided, and public meetings were held. The U.S. 101 corridor was identified in the Negative Declaration as an area where the variance could be used.

City of Carpinteria

Comment 20 Air Quality

The correction was made to the final environmental document.

City of Carpinteria

Comment 21 Air Quality Avoidance, Minimization, and/or Mitigation

The reuse of soil with aurally deposited lead will be done in accordance with the terms of the variance issued by the Department of Toxic Substances Control. The variance states that the soil must be placed within the Caltrans right-of-way. The placement will be a minimum of 5 feet above the maximum historic water table elevation and, depending on the lead concentration, covered with at least 1 foot of non-hazardous soil or pavement. Refer to Comment 19 for more information regarding aurally deposited lead-contaminated soils.

City of Carpinteria

Comment 22 Air Quality

The last part of that measure was struck and corrected in the Final Environmental Impact Report as follows: The name and telephone number of such persons would be provided to the Santa Barbara County Air Pollution Control District prior to land-use clearance for map recordation and finish-grading for the structure.

City of Carpinteria

Comment 23 Noise

1. Owners of residences whether they abut the freeway or are beyond the first row of homes that would experience a 5-dBA benefit as a result of installing a reasonable and feasible soundwall would be included on the list of residents that will be asked to vote on whether they prefer or oppose the construction of a recommended soundwall. The voting process will occur during project design. However, it should be noted that

voting in favor of a soundwall does not guarantee the wall will be constructed. The final decisions related to soundwall construction will be determined during design and the coastal development permit process.

2. Long-term monitoring was done at several locations along the project to determine when the existing peak noise hour occurs both in the morning and evening.
3. The existing worst-case scenario (noisiest condition) is a function of the flow of vehicles and their traveling speeds. This information was captured by the long-term monitoring. The future condition is based on the theoretical worst-case scenario for noise that can occur for a given number of traffic lanes under prevailing conditions. The short-term monitoring that occurred in many locations along the project was used to calibrate the actual conditions in the field to the predicted noise level output of the model.
4. Studies show that reflected noise by barriers to residences on the opposite side of the highway do not normally exceed 2 dBA due to factors related to noise sources that are distributed over the width of the highway; the paths of the barrier noise reflections are always longer than the direct noise paths; reflective barriers are not perfect reflectors, and the traffic stream may likely interfere with the reflection. Refer to the Noise Study Report prepared in March 2010 and addendums prepared in 2011, 2012, and 2013. Also, refer to Caltrans TeNS, 2009 Sections 6.1.7.2 and 8.1.1.2 and the following Federal Highway Administration website: http://www.fhwa.dot.gov/environment/noise/noise_barriers/design_construction/keepdown.cfm

City of Carpinteria

Comment 24 Noise

As a result of your comment, explanation of the soundwall voting process was added to Volume I, Section 2.27 (Noise) of the final environmental document.

This explanation states that all affected property owners would have an opportunity to vote during the established timeframe (during the design phase). It also defines the criteria used to establish the list of affected residents who will vote. The information also explains other aspects of voting, including whether business owners or renters can vote and how the votes are interpreted. A notation was added to the final environmental document acknowledging that all recommended soundwalls making the cut after the voting process would also require approval by the local jurisdictions during the Coastal Development Permit process.

City of Carpinteria

Comment 25 Noise

This segment of the project limits was addressed as part of the Linden Avenue to Casitas Pass Road Interchanges project. The area noted above was previously studied as part of that project. Soundwalls being proposed as part of the Linden-Casitas project would also attenuate noise associated with the improvements proposed as part of the South Coast 101 HOV Lanes project.

City of Carpinteria

Comment 26 Noise

The correction was made to the final environmental document.

City of Carpinteria

Comment 27 Noise

The correction was made to eliminate the extra words in the description of Receptor Group 2 (R4-R7A) in the final environmental document.

City of Carpinteria

Comment 28 Biological

The correction was made to the table showing riparian impacts. It should be noted that due to some slight shifting, the table is now identified as Table 2.38 in the final environmental document.

City of Carpinteria

Comment 29 Coast Live Oaks

The correction was made to the final environmental document (Section 2.3.1).

City of Carpinteria

Comment 30 Riparian and Coast Live Oaks

The proposed replacement ratios are an appropriate number for this project and meet Caltrans' responsibilities per the California Environmental Quality Act and National Environmental Policy Act. Caltrans will work with the city to obtain a coastal development permit.

City of Carpinteria

Comment 31 Wetlands

Caltrans expects to mitigate at a 3:1 ratio for permanent impacts to coastal zone and U.S. Army Corps of Engineers wetlands. The compensation ratio required for impacts is based on resource agency recommendations as well as the function and quality of wetland habitat that needs to be replaced. It should be noted that the coastal wetlands to be affected by the project are low quality wetlands that are constructed roadside drainage ditches next to U.S. 101. They are human-made and routinely disturbed.

City of Carpinteria

Comment 32 Wetland Mitigation

Caltrans is not proposing an in-lieu fee payment, but instead proposes to support specific wetland restoration and enhancement projects in the

Carpinteria Salt Marsh that would meet the goal of restoring wetlands to offset the relatively small amount of permanent impacts. The Carpinteria Salt Marsh, a coastal environmentally sensitive habitat area (ESHA), provides protection for many important local resources and provides habitat for many species of plants and animals. Carpinteria General Plan Objective OSC-3 is “Preserve and restore wetlands such as the Carpinteria Salt Marsh.” Carpinteria General Plan Policy OSC-1c. is to “Establish and support preservation and restoration programs for ESHA, including but not limited to Carpinteria Creek, Carpinteria Bluffs, Carpinteria Salt Marsh, seal rookery, Carpinteria reef, Pismo clam beds and the intertidal zones along the shoreline.” The salt marsh is next to the project area, so it falls in the same geographic region. It is also downstream of several drainage features within the project limits that are mapped as coastal wetlands. Restoration and enhancement of wetlands at the salt marsh would provide benefit within the same geographic region, benefit wetland function and habitat value at this coastal ESHA, and be in accordance with the Carpinteria Local Coastal Plan Objective OSC-3 and Policy OSC-1c.

City of Carpinteria

Comment 33 Construction Impacts

The last sentence was changed to state that the automatic wheel-washing equipment was recommended. The “gravel pads” reference was removed from the sentence because it was mentioned earlier in the measure.

City of Carpinteria

Comment 34 Cumulative Impacts

The purpose of a cumulative impacts analysis is to analyze the potential incremental environmental impacts associated with a project in conjunction with past, present and reasonable foreseeable future projects. As part of the cumulative impact analysis, it was determined that only impacts to visual/aesthetics were not fully mitigable and those impacts would contribute

to a significant cumulative impact. The final environmental document was updated to expand the discussion of cumulative impacts. In addition to visual resources, there was discussion added for transportation, traffic, and pedestrian/bicycle; water quality resources; and biological resources. Refer to Section 2.5 of the final environmental document.

City of Carpinteria

Comment 35 Cumulative Project List

The two projects were added to Table 2.50 in the final environmental document.

City of Carpinteria

Comment 36 Significant Effects—Noise

As stated in Volume I, Section 3.2, the project on its own generally does not generate greater than 3 decibels over existing noise levels. To reduce noise, Caltrans is proposing the use of noise-attenuating pavement where feasible within project limits. In regard to following local noise standards, we understand that local standards may differ from state and federal standards, but as a state agency we are obligated to maintain consistency in applying state and federal standards equally across the state. When there is an inconsistency between state and local standards, the Federal Highway Administration Noise Standards and the Caltrans Noise Protocol must be followed. It should be noted that under the Caltrans noise protocol, interior noise levels would need to rise above 52 decibels versus the 45 decibel level established locally.

City of Carpinteria

Comment 37 Significant Environmental Effects—Cultural Resources

As documented in Section 2.1.7 (Cultural Resources) of the draft environmental document, elements of the Via Real Redeposited Midden were moved onsite from their original location in connection with an early highway

project. Recent design revisions were able to shift Alternative 1 (preferred alternative) toward the median in an effort to minimize potential impacts to the site. Comprehensive studies conducted by Caltrans suggest that the National Register-eligible portion of the site is not only located below the level of proposed U.S. 101 construction but is also located outside the State right-of-way—and therefore outside the Area of Direct Impact. An Environmentally Sensitive Area (ESA) and exclusionary fencing will be established and enforced around the known site limits. Although we do not anticipate that there will be any impacts to the redeposited midden, or that significant portions of the site extend into the State right-of-way, or that any other significant archaeological resources are present, Caltrans has deemed it prudent to consider the remote possibility that discoveries during construction may still occur.

Caltrans has consulted with the State Historic Preservation Officer and local Chumash representatives identified by the Native American Heritage Commission to develop a systematic approach to addressing not only any adverse effects to the Via Real Redeposited Midden but also effects to any similar as yet unidentified archaeological resources discovered during construction, in the unlikely event that such discoveries are made. Adverse effects to this property were initially proposed to be resolved by a Memorandum of Agreement prepared in consultation with the State Historic Preservation Officer and the Chumash representatives. As part of our ongoing consultation, however, the resolution document was restructured. Adverse effects will now be resolved in conformity with the June 20, 2013 *Programmatic Agreement between the California Department of Transportation and the California State Historic Preservation Officer Regarding the South Coast 101 HOV Lanes Project, U.S. Route 101, Santa Barbara County, California*. Both the Programmatic Agreement and its appended Treatment and Data Recovery Plan are included in Appendix D, *State Historic Preservation Officer Correspondence*, of this final environmental document.

City of Carpinteria

Comment 38 Biological Resources

The project would have temporary and permanent impacts on riparian habitat, Coastal Commission-defined wetlands, U.S. Army Corps of Engineers jurisdictional wetlands, and other waters of the U.S. The project is inconsistent with the City of Carpinteria Local Coastal Plan policies protecting wetland resources. As such, a Local Coastal Plan amendment will be required. During the coastal permitting phase of the project, additional coordination would be needed with the City of Carpinteria and the California Coastal Commission to satisfy the requirements of the coastal permitting process.



City of Santa Barbara
Community Development Department

www.SantaBarbaraCA.gov

July 9, 2012

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RE: South Coast 101 HOV Lanes Project Draft EIR/EA

Dear Mr. Fowler,

The City of Santa Barbara Planning Commission and staff have reviewed the Draft Environmental Impact Report/Environmental Assessment (DEIR) for the South Coast 101 HOV Lanes Project dated March 2012 and are providing the enclosed comments on the document, for your consideration. The comments are focused on the portion of the project that is within the City's jurisdiction. We want to thank Caltrans Project Manager, Scott Eades, and Gregg Hart from SBCAG for participating in two hearings on the DEIR before the Planning Commission on May 31st and June 14th.

As you are aware, a Coastal Development Permit is required from the City for the portion of the project within the City's jurisdiction. Because of its permitting authority, the City is a Responsible Agency under CEQA, and the Planning Commission must make required CEQA findings in addition to Coastal Development Permit policy consistency findings to approve the project. It is therefore important that Caltrans addresses the enclosed comments to the Planning Commission's satisfaction, and that the environmental document is prepared consistent with CEQA requirements and to City standards in order to present an approvable project and avoid delays at the Coastal Development Permit application stage. We understand that addressing these comments may result in "significant new information" as defined in CEQA Guidelines Section 15088.5, thereby requiring recirculation of a revised DEIR.

The City has adopted policies designed to minimize environmental impacts that are applicable to this project, including policies related to the provision of pedestrian and bicycle facilities, aesthetics of new freeway structures and landscaping, protection and enhancement of biological resources, use of soundwalls, undergrounding of utilities, and economic impacts resulting from highway construction, operation and maintenance. These policies should be carefully considered at this stage to minimize the need for additional environmental review during the City's review of the Coastal Development Permit application.

Major City comments address the transportation/circulation and aesthetics sections of the DEIR. We recognize that the primary purpose of the project is to provide additional lane capacity to reduce congestion and delay on Highway 101. According to the traffic analysis

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completed for this project, adding a lane in each direction to Highway 101 results in significant adverse project-specific and cumulative traffic impacts to local intersections based on City and Caltrans impact thresholds. The DEIR does not adequately disclose this information or address the results. CEQA requires that mitigation be provided for these impacts where feasible, and that environmental impacts from mitigations also be considered in the EIR.

We understand that Caltrans will not necessarily carry forward all five Cabrillo interchange configurations into subsequent environmental documents (revised DEIR or Final EIR). The five Cabrillo interchange configurations are presented as alternatives and their impacts should be analyzed individually and compared in the document. Of the five configurations reviewed in the DEIR, the Planning Commission majority prefers configuration F-Modified. Staff and the Planning Commission prefer the circulation options provided by F- Modified with northbound exits provided at Cabrillo Blvd. and Hermosillo Rd.; however, we believe circulation from Cabrillo Blvd. to the southbound on ramp would be substantially improved with replacement of the Union Pacific Bridge. A new bridge could accommodate an additional right turn lane to access a new southbound on ramp and provide a bicycle/pedestrian connection through the intersection. We request that Union Pacific Bridge replacement be included in the project and analyzed in the DEIR.

We believe that the use of Los Patos Way as a primary on/off ramp proposed in other Cabrillo interchange alternatives would be inappropriate since the expanded facilities and added traffic would be detrimental to the character of Los Patos Way and would result in adverse environmental effects on the Andree Clark Bird Refuge. Planning Commissioners also expressed safety concerns about any alternatives that would feed a new northbound Cabrillo off ramp directly into the Hot Springs roundabout, and a desire to have the Coast Village Road/Olive Mill Road intersection improved as part of the project based on traffic impacts identified in the project's technical reports.

We agree with the DEIR that, regardless of the Cabrillo interchange alternative, the project would result in significant adverse project-specific and cumulative aesthetic impacts. Staff and the Planning Commission recognize the Cabrillo interchange as an important visual gateway into the City and understand the right of way constraints, but expect excellent design and landscaping with this project consistent with City policy direction. We have included comments on the visual impact analysis and additional suggested mitigations to reduce the severity of the impacts. We recommend that the City Design Review Team required by the City's Highway 101 Design Guidelines be convened to review this project sooner rather than later.

If you have any questions or concerns about the enclosed comments, please direct them to Daniel Gullett, Associate Planner, at (805)564-5470 or DGullett@SantaBarbaraCA.gov.

Thank you for the opportunity to comment on the DEIR. We recognize the statewide, regional, and local importance of this project and strongly encourage Caltrans' close collaboration with the City of Santa Barbara, City of Carpinteria, and the County of Santa

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Barbara during additional environmental review and further development of the project. We believe this collaboration will be critical to the project's success.

Sincerely,



Paul Casey

Community Development Director
Assistant City Administrator

Enclosure

Cc: Mayor and Council
Planning Commission
Transportation and Circulation Committee
Jim Armstrong, City Administrator
Christine Andersen, Public Works Director
Browning Allen, Transportation Manager
Rob Dayton, Principal Transportation Planner
Bettie Weiss, City Planner
John Ledbetter, Principal Planner
Danny Kato, Senior Planner

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City of Santa Barbara comments on March 2012 Draft EIR/EA

- 1) Page vii-x – Summary Table S.1
 - a) The impact summary table should indicate whether impacts are less than significant or potentially significant before and after mitigation.
 - b) Because multiple jurisdictions will all be using this document in their review of Coastal Development Permit applications, it would be helpful to have impacts broken out for each jurisdiction. The geographic extent of impacts is unclear in the document for some resource areas.
- 2) Page 2 – Background first paragraph
The most recently built project is the Operational Improvements project.
- 3) Page 8 – Background second paragraph
Six lanes now exist north of the Cabrillo interchange with the Operational Improvements project.
- 4) Page 17-20 and 27 – Cabrillo Interchange Variations
 - a) A discussion of project costs is inappropriate in this document. CEQA Guidelines 15126.6 state that the discussion of alternatives shall focus on alternatives to the project which are capable of avoiding or substantially lessening any significant effects of the project even if the alternatives are more costly. If an alternative is infeasible due to cost, it should be removed from the DEIR.
 - b) All variations should include the completion of the previously approved bike/pedestrian way under the Union Pacific railroad bridge, just west of the Cabrillo Blvd Interchange.
 - c) Some variations (F, F Mod, M, M Mod) include the demolition of one or both of the mainline bridges over Cabrillo Blvd, and replacement with mainline bridges that are much closer together than the existing mainlines. All variations should include descriptions of whether the mainline adds to the existing bridges over Cabrillo Blvd, or whether the mainline will be reconstructed, and if so, where.
- 5) Page 22 – Section 1.3.3
The heading is "Transportation System Management and Transportation Demand Management Alternative" but no alternative matching that description is described or discussed.
- 6) Page 22 – Section 1.3.4 Comparison of Alternatives
As currently proposed, the Cabrillo Interchange Configurations are alternatives and should be evaluated and compared as such. The visual simulations and traffic analysis evaluate each of the configurations independently, but comparative analysis is not clearly provided in other resource areas. The comparative impacts for each Configuration should be discussed in each section of the document.
- 7) Page 31 – Permits and Approvals Needed
In addition to the list of permits required by other agencies, design review approvals by the Historic Landmarks Commission and the Architectural Board of Review, and approvals of tree removals by the Parks and Recreation Commission, are required.

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- 8) Page 42-51 – Section 2.1.1.2 – Consistency with State, Regional and Local Plans
- Where is the referenced Policy Consistency Matrix?
 - Please update with the adoption of City's General Plan update in December 2011 and add the City of Santa Barbara's Bicycle Master Plan (1998/2003), City of Santa Barbara's Pedestrian Master Plan (2006), and the SBCAG Regional Bicycle Plan.
 - Please be aware that if the Planning Commission and City Council cannot find that the project is consistent with the policies of the City's Local Coastal Plan and the Coastal Act, the project cannot be approved.
A more robust consistency analysis is required at this point. Describe in the document how the subject project would provide pedestrian and bicycle facilities between the Andree Clark Bird Refuge and Coast Village Road consistent with City and SBCAG plans and policies. The City's Local Coastal Plan also includes policies and implementation strategies on new pedestrian access across Highway 101 from the East Side Neighborhood to the waterfront. Please include a new crossing in the project description and analyze its impacts in the DEIR or demonstrate how a crossing is infeasible as part of this project (the Planning Commission will determine whether or not it is infeasible). Include analysis of impacts resulting from undergrounding of utilities, which is required by Local Coastal Plan Policy 9.3.
- 9) Page 47 – Environmental Consequences of Build Alternatives - last paragraph
This states that the City of Santa Barbara does not have specific policies for widening Highway 101. City of Santa Barbara's Local Coastal Plan provides multiple specific policies for improvements to Highway 101, including policies 3.14, 4.7, 9.8, 9.9, 9.10, 9.11, 9.12, 9.14, 9.15, 9.16, 9.17, 10.1, 10.2, 10.3, 10.4, 11.16, 11.18, 11.20, 11.21, and 11.22.

This paragraph states that the project would enhance access to coastal resources by improving vehicular circulation within the Highway corridor. It should note that, according to the traffic study, the project would result in degraded circulation on some local streets that provide coastal resource access.
- 10) Page 48 – Environmental Consequences of Build Alternatives - last paragraph
The City of Santa Barbara U.S. 101 Coastal Parkway Design Guidelines also identifies minimum median width.
- 11) Page 49 – Environmental Consequences of Build Alternatives - first paragraph
This should refer to the City of Santa Barbara U.S. 101 Coastal Parkway Design Guidelines (instead of County).
- 12) Page 50 – Table 2.2 Potential Policy Inconsistencies - Historical Resources
This should refer to the City of Santa Barbara LCP policy (not County).
- 13) Page 57 – Table 2.3 Park and Recreational Facilities
Include Montecito Country Club in this table.
- 14) Page 58 – Parks and Recreation Environmental Consequences - first sentence
Access to parks and recreational facilities may be more difficult at times from local streets due to increased congestion at some locations.

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15) Pages 58-60 - Growth

How is the information in the Growth Related Impacts Analysis related to the data used in the Travel Forecast Model? Many assumptions in the Growth Analysis model are unclear. The model should include 2011 City of Santa Barbara General Plan for growth constraints. How was Ventura's maximum growth capacity determined? Ventura's 2008 General Plan update is for growth through 2020. Is it reasonable to assume that there would not be additional growth allowed for beyond that time horizon?

The Growth Related Impacts Analysis concludes that residential development pressure is reduced in Ventura County with the project compared to the No Build Scenario. Based on the jobs/housing imbalance in the City of Santa Barbara and existing and forecasted travel demand on Highway 101, we anticipate that there would be increased demand for residential development in Ventura and additional commuters would travel between Ventura and Santa Barbara with reductions in congestion and travel time between Ventura and Santa Barbara upon completion of the project.

16) Page 67 – Community Impacts

This section should consider the long term economic impacts to Coast Village Road and the waterfront area for Cabrillo interchange Configurations F and J (which do not include a northbound Cabrillo on ramp) and propose mitigation as necessary.

17) Section 2.1.5 -Traffic and Transportation/ Pedestrian and Bicycle Facilities

a) Overall Traffic Impact

The DEIR fails to disclose all the project-level traffic impacts discovered by the Project Development Team effort. The Forecast Operations Report, dated October 19, 2009, "is to provide requisite technical traffic support information for the PS&E and environmental phases of the Highway 101 HOV Widening Project" (Study Propose, Page 1). This report concludes that the proposed project will have significant project level traffic impacts to a total of nine intersections, and significant cumulative traffic impacts at a total of 15 intersections (Intersection Operational Results, Page 4) throughout the region from Carpinteria to Goleta. The DEIR references this study, but does not disclose these significant adverse traffic impacts or explain why the impacts were not disclosed. The DEIR, rather, concludes that there are no traffic impacts as a result of the proposed project.

We request that the conclusions of the Forecast Operations Report and the South Coast 101 HOV Traffic Study Cabrillo/Hot Spring Interchange Configuration Analysis Technical Memorandums dated March 21, 2011 and July 19, 2011 be disclosed to the public. The intention of the Project Development Team's work was to investigate the project's traffic impact on the region. Much time was spent on this effort. Please include the Report's conclusions in the DEIR and present this information to the public and decision makers to clarify the project's adverse effects before finalizing the document.

b) Olive Mill/Coast Village Road

The DEIR divides the Olive Mill/Coast Village intersection into 3 intersections for the purpose of level-of-service analysis. This methodology does not appropriately portray the poor level-of-service experienced by the intersection users, which has been measured as Level of Service F using actual average vehicle delay rather than volume counting. The DEIR does show that the proposed project will decrease the level-of-service at the intersection. We ask that the DEIR be amended to show that the

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proposed project will have a significant impact to this intersection and demonstrate how that impact will be mitigated.

c) Circulation at the Cabrillo interchange

- i) The analysis at this location does not assume or analyze the existing condition, which is no southbound on ramp. Please adjust the technical studies to compare future conditions with the actual existing lane configurations and levels of service.
- ii) Configurations F and F Mod propose new ramps adjacent to the existing Union Pacific Bridge. The span of the existing bridge does not allow for more than one lane in either direction below it. How will this affect delay of eastbound Cabrillo traffic with the new southbound 101 on ramp? Replacement of the railroad bridge with a wider bridge providing a dedicated right turn lane would reduce delay. Describe and quantitatively compare the circulation through the interchange between Configurations F and F Mod.
- iii) We are concerned that F Mod has not been fully analyzed in the technical studies. The new configuration was not analyzed in the Cabrillo Boulevard I/G Screening Analysis. The distance between the north and southbound ramps is reduced to 195' according to the preliminary concept design. This is the shortest distance of all the configurations. The left-turn lanes for north and southbound directions are proposed to be shared, further reducing the each left turn's queuing capacity. Please analyze these intersections as one operation to determine the appropriate operational level of service and perform the queuing demand for each approach.

d) Traffic Diversion

The traffic diversion assumptions associated with the Cabrillo interchange analysis should be revisited now that the Operational Improvements project is complete. It appears that more traffic is entering the freeway southbound at Olive Mill Road than expected.

18) Page 99-100 - Cabrillo Interchange descriptions

Configuration F should be more clear that the southbound mainline lanes are shifted to the middle and that the existing center southbound off-ramp is removed and replaced with a new off-ramp to the outside of the shifted mainline traffic. The remaining interchange Configurations described here are also misleading. The detailed description of these changes located at the front of the document should be copied here with the diagrams to help the public understand the proposed changes.

19) Page 100 - Cabrillo Interchange - Primary and Secondary Intersections

Include the Cabrillo and Los Patos Way intersection as a primary intersection because it is directly impacted by the three project alternatives where a new southbound on-ramp is added and the southbound off-ramp traffic is more than triple. Page 101 seems to support this by saying: "It should be noted that the intersections of Coast Village and the Hermosillo Road and northbound off-ramp were considered as a primary intersection under Configurations F, J and M. Under the modified Configurations F and M, however, these intersections were redefined as secondary given that they would remain physically unchanged relative to their baseline conditions." This statement seems to imply that intersections with some level of change in intersection volume as a result of the project determine primary and secondary intersections. The Cabrillo/Los Patos intersection would have a large increase in volume as a result of Configurations J, M, and M Mod.

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20) Pages 101-102 - Cabrillo Interchange

Last paragraph on Page 101 erroneously excludes Cabrillo Boulevard and Los Patos Way as an intersection that includes reconstructed ramps. The South Coast 101 HOV Traffic Study Cabrillo/Hot Spring Interchange Configuration Analysis Technical Memorandums dated March 21, 2011 and July 19, 2011 specifically identify that a traffic signal is warranted at this intersection, as a direct result of several of the project alternatives. The DEIR omits this fact and does not identify this intersection as impacted. The DEIR must document the project's impact on this City intersection and identify the appropriate mitigation measures to offset this impact.

21) Page 102-103 - Los Patos and Cabrillo Intersection Mitigation

The DEIR states that the intersection of Los Patos Way and Cabrillo Blvd. is projected to operate at LOS F during peak hours in 2020 and 2040, but does not propose mitigation because Caltrans believes that a project at that intersection is included in the City's Capital Improvement Program. Although mentioned in the six-year, unfunded Capital Improvement Program, the City does not consider the project to be reasonably foreseeable. Further, the Capital Improvement project is described for general improvement of existing pedestrian, bicycle and motorist operations at Cabrillo/Los Patos, and does not address any additional traffic volume that would result from Highway 101 HOV alternatives (see enclosed CIP project description). Even if it did, the purpose of the CEQA document is to disclose potential impacts to the public and decisionmakers, and to identify feasible mitigation. CEQA requires that the environmental effects of mitigation measures be considered.

22) Page 107 - Bicycle and Pedestrian Routes

The City supports implementation of components of the adopted SBCAG Regional Bicycle Plan as part of this project.

The 101 Operational Improvements project included provision for walking and biking through the Cabrillo Boulevard Interchange with Caltrans standard accommodations in the form of sidewalks, and class I and II bike lanes. Since that time, the team has failed to gain Union Pacific's permission to implement these proposed accommodations under its right of way via a new tunnel. Union Pacific has suggested a different accommodation that requires replacement of the Union Pacific Bridge with a wider road section under it. These bike and pedestrian accommodations were included as a part of the City's Coastal Development Permit to widen Highway 101 in the vicinity. The DEIR does not indicate that this bike/pedestrian improvement is no longer proposed. The DEIR simply concludes on page 102 that the project will maintain the continuity of existing and future bike and/or pedestrian paths as a part of all interchange Configurations. This is not true. The DEIR does not describe how the class I bike path or sidewalk will be impacted by the removal of the center traffic signal. The DEIR does not describe how bikes and pedestrians are to transition under the Union Pacific Railroad Bridge where there are no accommodations for pedestrians. This must be described and addressed appropriately, both as a change to the environment and based on the project's consistency with the City of Santa Barbara Local Coastal Plan, which requires improvement of pedestrian and bicycle access with the widening of Highway 101. Staff and the Planning Commission believe that replacement of the Union Pacific Bridge will be necessary to provide a safe and appropriate bicycle and pedestrian facility, and would enhance circulation with Configuration F and F Mod by providing space for a dedicated right turn lane for the proposed southbound on ramp.

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- 23) Page 175 – Cabrillo Interchange - visual simulations
The DEIR should provide site plans and elevations of the Cabrillo interchange alternatives. Simulations with public views affected by the proposed alteration of the railroad profile for Configurations J, M and M Mod should be included.
- 24) Page 176-181 – Photo of Existing Conditions at Cabrillo Interchange
Since the Operational Improvements project is mostly completed, use a current aerial photo, instead of an old photo that's been "enhanced," to show the improvements.
For the proposed interchange alternatives, show the existing in the photo with simulated landscaping, and only show the proposed as "enhanced." It's difficult to discern differences between the existing and various alternatives, especially on the northbound side.
- 25) Page 183-185 – Visual Simulation OV-21 - Configuration F, F Mod, J, and M
- Why do these configurations result in the loss of so many large skyline trees? Figures 2-11 through 2-15 do not show this, and there is no description of the reason for the loss in the previous text.
 - The descriptions of the reduction in visual quality is inconsistent between Configurations F Mod and Configuration M, in that Configuration M states that, "...much of the vegetated character and screening would be lost, resulting in a reduction in visual quality," implying that there would be a below-average visual quality resulting. Configuration F Mod has the same lane Configuration for the northbound lanes, but the text on page 184 concludes that F Mod would maintain an above-average view quality as from OV-21. We believe that the implied below-average visual quality for Configuration M is correct, and Configuration F Mod should be changed to below-average as well, since Configuration F Mod has even more impacts (more limited median planting).
 - Both Configuration F and F Mod are described as having a moderately high reduction in visual quality. However, since there is very limited opportunity for median planting in F Mod, the visual quality is much poorer than Configuration F. We don't believe that Configuration F Mod would have above-average view quality for this reason and the reason described above in 25 b).
 - Configuration M would also lose the skyline trees, but that is not mentioned in the text.
- 26) Page 187 – Visual Simulation OV-22 - Configuration F Mod, M, and M Mod.
- Why can't trees be planted in the vegetation strip between the proposed offramp and the road (Cabrillo/Coast Village) to reduce visual impacts?
 - This simulation does not accurately depict the retaining wall necessary for the new northbound off ramp.
- 27) Page 189 – Visual Simulation OV23 - Configuration J, M, M Mod
To characterize the decrease in visual quality as "slight" is an understatement. We believe the decrease to be substantial.
- 28) Page 190 – Visual Simulation OV24 - Configuration F
- Why is there a reduction in skyline trees in this and other Configurations?
 - To characterize the decrease in visual quality as "moderately substantial" an understatement. We believe the decrease to be substantial.

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- 29) Page 191-192 – Visual Simulation OV24 - Configuration F Mod
- This photo does not adequately show the reduction in visual quality for Configuration F Mod, as it does not show the northbound traffic that will be exposed to view because of the lack of median landscaping (See page 183 OV21 Configuration F Mod).
 - Paragraph two (under the photo), line 5 states that the reconfiguration of the lanes would result in a "...somewhat narrower median..." The median would be minimal, and a substantial decrease in width from the existing median width.
 - The last paragraph characterizes the resulting visual quality as, "...moderately substantial reduction in visual quality..." We believe that the resulting visual quality is substantially reduced.
- 30) Page 192 – Visual Simulation OV24 - Configuration J
Why does this Configuration have a reduction in skyline trees?
- 31) Page 193 – Visual Simulation OV24 - Configuration M
Why does this Configuration have a reduction in skyline trees?
- 32) Page 195 – Visual Simulation OV24A - Configuration F
- The loss of skyline trees still has not been adequately described, and does not match with Figure 2-11 on page 177. According to Figure 2-11, the offramp would be built in the location of the existing SB mainline, which is being moved to the north, so removal of the skyline trees should not be necessary.
 - The reduction in visual quality at this location would be substantial, not "moderately substantial," and the resulting degree of intactness and unity would be below-average, not "somewhat above average."
- 33) Page 196 – Visual Simulation OV24A - Configuration F Mod
- The loss of skyline trees still has not been adequately described, and does not match with Figure 2-11 on page 177. According to Figure 2-11, the offramp would be built in the location of the existing SB mainline, which is being moved to the north, so removal of the skyline trees should not be necessary.
 - This photo understates the visual impact because it does not show the northbound traffic that will be visible because of the minimal median, and lack of opportunity for landscape screening.
 - We agree that the reduction in visual quality at this location would be substantial, but we believe that the resulting degree of intactness and unity would be inadequate, not "moderate."
- 34) Pages 197-199 - Visual Simulation OV24A - Configuration J, M and M Mod
- The visibility of the retaining wall for the Union Pacific railroad tracks does not appear to be able to be screened with landscaping. This retaining wall is not mentioned as a factor in the visual characteristics of the area, even though it is a major factor in the reduction in visual quality. We believe that the resulting Visual Quality is substantially reduced, and the resulting intactness and unity is below-average.
 - The width of the median is unknown in Configuration M and M Mod, so we cannot know what type of median landscaping can be planted. If the median width in these Configurations is not wide enough to support tall landscaping, the visual impact of these Configurations could be more substantial.

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- 35) Page 200 – Visual/Aesthetics Impacts - Configuration F Summary
We agree that the visual quality from Highway 101 would be substantially reduced; however, we don't agree that the resulting scenic quality would be "somewhat above average." We believe the resulting scenic quality would be below average.
- 36) Page 201-202 – Visual/Aesthetics Impacts - Configuration F Mod Summary
- We agree that the visual quality from Highway 101 would be substantially reduced; however, we don't agree that the resulting scenic quality would be "slightly above average," in terms of intactness and unity. They would be below average.
 - Paragraph 4: We believe that the view from Coast Village Road and Old Coast Highway would be substantially reduced.
 - Last paragraph, last line mentions Configuration M. Should this be Configuration F Mod?
 - Page 202 first paragraph last line. We believe that the decrease in visual quality would be substantial.
- 37) Page 202-203 - Visual/Aesthetics Impacts - Configuration J Summary
- Paragraph 2: We believe that the degree of intactness and unity as a result of the reduced median landscaping (compared to existing) would be average at best, not "above average."
 - Paragraph 4: We believe that the reduction in visual quality that would result from the new Los Patos onramp and associated vegetation removal and retaining wall construction would be substantial.
- 38) Page 203-204 - Visual/Aesthetics Impacts - Configuration M Summary
- Paragraph 3: We believe that the view from Coast Village Road and Old Coast Highway would be substantially reduced.
 - Paragraph 4: We believe that the reduction in visual quality that would result from the new Los Patos onramp and associated vegetation removal and retaining wall construction would be substantial.
- 39) Page 204 - Visual Simulation OV-25 Existing Condition
Paragraph 1: Line 2: Since construction is complete, please update to show the existing view with simulated landscaping.
- 40) Page 210 - Table 2.22 – Visual Impact Ratings
This table does not explain the rating scale. What is the threshold used by this DEIR to determine the level of visual impact. The DEIR does not make a determination of whether the visual impacts are substantial or merely adverse. We believe that all of the visual impacts are substantial, except for Observer Viewpoint 23, for Configurations F and F Mod. Substantial impacts must be mitigated, and the proposed mitigation measures for the loss of vegetation and reduction in view quality is too vague to analyze.
- 41) Page 211 – Visual/Aesthetics Impacts - Avoidance, Minimization, and/or Mitigation Measures
- Paragraph 2, Last line. This is the first time that this DEIR uses the key phrase, "substantial adverse visual impacts." We believe that this language should be used in the previous sections, wherein the visual impacts caused by the various Configurations are described.

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- Although paragraph 2 identifies substantial adverse visual impacts, it does not state the locations of the impacts. We believe that most of the Cabrillo interchange configurations have substantial visual impacts, and that those impacts need to be mitigated, or described in detail, so that a statement of overriding considerations can be requested.
 - The following Mitigation Measures should be considered to reduce impacts:
 - New K-rail shall include aesthetic treatment with color and/or texture, such as a sandstone appearance, appropriate to the location.
 - Anti graffiti materials and coatings shall be used on new signs and structures expected to be graffiti targets.
 - Replace plants that are removed with similar species unless replacement plants are provided with increased air quality benefits, subject to review and approval by the appropriate design review board.
 - New bridge structures would be designed to maintain the historic character of the Cabrillo interchange, and should create a similar ambiance to the existing bridges, emulating human-scale characteristics using methods including divided lanes, additional support structures and landscaping to break down the scale.
 - Replace degraded highway landscaping with improved landscaping north of the highway segment improved with the Operational Improvements Project.
- 42) Page 214 – Cultural Resources – Regulatory Setting
The City's Master Environmental Assessment includes standards for historic structures and archaeological reports, and requires that the Historic Landmarks Commission (HLC) review and approve of those reports.
- 43) Page 215 – Cultural Resources – Area of Potential Effects
The Areas of Potential Effect for cultural resources excludes the Los Patos/Cabrillo Blvd intersection. If mitigation for traffic impacts is necessary at that intersection, include analysis of impacts to the state-designated East Cabrillo Boulevard Parkway Historic District, the City Landmark Charles Caldwell Park Memorial Watering Trough and Fountain, and the known archaeological site in the vicinity.
- 44) Page 233-237 - Water Quality and Storm Water Runoff and Water Quality Assessment
- The City of Santa Barbara's NPDES Phase II regulations are not addressed in the project's Draft DEIR/Water Quality Assessment (WQA) Report. The WQA only recognizes state and federal requirements, which are less protective for water quality than the City's storm water management requirements.
 - Section 3 of the WQA (page 9) is titled "Federal, State, and Local Regulations," and yet local regulations are not addressed in this section. The City's Storm Water Management Program (SWMP) requirements and Local Coastal Plan must be included.
 - Coastal Act Section 30231 and Policies 6.11-B and 6.12 - 6.14 of the City's Local Coastal Plan, in order to comply with the CA Coastal Act, address the sensitivity and necessary preservation of the City's drainages, creeks, marine environment, and the Andree Clark Bird Refuge. Highway structures and development adjacent to the refuge are specifically identified as projects having to protect and enhance the bird refuge by addressing runoff and drainage.
 - On pages 22 and 32 of the WQA, the statement that "channelized watersheds within the project limits include Sycamore..." is incorrect. Sycamore creek has a largely natural bottom and many areas with natural creek banks (i.e., not channelized).

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- e) If Caltrans intends to claim technical infeasibility for the project to meet the City's storm water management requirements; please submit a drainage/hydrology report that explains why meeting the requirements is infeasible by demonstrating the infeasibility of the storm water runoff BMPs presented in the [City's Storm Water BMP Guidance Manual](#) and demonstrate to what extent the currently proposed BMPs (bio-filtration swales and vegetated drainages) capture and treat storm water (i.e. their combined capacity) in relation to the total increase in runoff volume and rates that will occur from the proposed project.
As stated in the City's Storm Water BMP Guidance Manual on page 6-4; "The City may allow for one or more of the storm water runoff requirements to be waived for a Tier 3 project if technical or legal infeasibility can be established by the project applicant. The City shall only grant a waiver of infeasibility when all available storm water runoff BMPs have been considered and rejected as infeasible. The burden of proof is on the project applicant to demonstrate that all available measures are infeasible. Where strict compliance with the City's storm water runoff requirements is found to be infeasible, the project applicant must utilize all feasible measures to achieve the greatest compliance possible."
 - f) By not adhering to the City's NPDES Phase II regulations, the project could result in potentially significant impacts to water quality. The DEIR should identify this potentially significant impact and provide mitigation.
- 45) Page 275 - Air Quality - Paragraph 3
- a) The Air Quality section assumes that some traffic will divert or reroute from elsewhere in the road network but no additional traffic will result from the proposed project. Please provide justification for this assumption here and in the traffic/circulation section.
 - b) According to the traffic study, the project will cause more congestion on some local streets rather than less. Some of the increased local congestion and idling may be offset by the reduction in congestion on the freeway itself, but this should be analyzed quantitatively, rather than qualitatively as written in the DEIR.
- 46) Page 277 - Air Quality
- a) Paragraph 1, line 3. Similar to the comment above, based on the traffic study, it is not clear that the project would improve low-speed and idling emissions with increased congestion on local streets.
 - b) Paragraph 2. This states that the project would improve local circulation in the immediate area, which, according to the traffic study is not the case for some local intersections.
 - c) Paragraph 2. How does this project quantitatively affect the development potential of parcels within 250 feet of Highway 101 based on General Plan Policy ER7? Please provide a map showing the affected parcels.
- 47) Page 278 - Air Quality - Paragraph 1
- According to the traffic study, the project will increase vehicle backups and idling time at interchanges and on nearby local streets. A more robust impact analysis is required.
- 48) Page 282-283 - Air Quality - Mitigation
- Consider mitigation that would increase opportunities for use of alternative transportation to improve air quality, including new bicycle and pedestrian connections and improvements of existing bicycle and pedestrian paths.

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The mitigations involving trees and vegetation should also be placed in the Visual Quality section.

- 49) Page 286 - Noise - Regulatory Setting
Use the City of Santa Barbara's noise impact thresholds from the City's General Plan Environmental Resources Element to determine project effects for areas affected by portions of the project within the City.
- 50) Page 350 – Biology - Natural Communities
The DEIR makes no mention of the skyline trees to be removed in most of the Cabrillo interchange options. The document should inform the reader as to the numbers and locations of trees to be removed, the reason for their removal, and mitigation to replace the trees that must be removed for each of the proposed configurations.
- 51) Page 379 - Biological Study Area
Why is the Andree Clark Bird Refuge excluded from the Biological Study Area? Three alternatives include construction of a temporary railroad bridge toward the Bird Refuge and conversion of Los Patos to a major access to Highway 101. Impacts to this coastal wetland should be analyzed in the DEIR.
- 52) Page 397 - Construction Impacts
The DEIR should assess temporary and permanent economic impacts on the community resulting from the duration and extent of project construction, and proposed mitigations as necessary.
- 53) Page 400 - Traffic and Transportation/Pedestrian and Bicycle Facilities - Paragraph 1
The traffic study indicated that there will be increased delay at some local intersections. How will decreasing local intersection delay lead to enhanced pedestrian and bicycle circulation at other locations? This is a long term issue, which is misplaced in this construction impacts section.
- 54) Page 406 - Noise Impacts Resulting from Temporary Relocation of Railroad Tracks
Paragraph 1, line 5: A doubling of the distance should reduce the noise impacts by 6dB (see page 405, last two lines), not increase them by 3dB.
- 55) Page 408 - Construction Impacts – Avoidance, Minimization and/or Mitigation Measures
Recommended additional mitigations:
- Caltrans should work closely with City Public Works regarding the construction traffic management plan for all improvements involving road or ramp closures.
 - Prior to project construction, Caltrans shall provide a closure plan that identifies methods to protect access to visitor-serving businesses and visitor destinations and points of interest, proposed signage and any other methods to mitigate the impacts of the closure.
 - Upon completion of construction, Caltrans should repair and repave the surrounding local streets to mitigate for construction impacts caused by large trucks, heavy equipment, and detours.

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- 56) Page 430 - Discussion of Significant Impacts
It would be helpful at the Coastal Development Permit stage to specify which jurisdictions have impacts and where. Impacts on Traffic and Transportation/Pedestrian and Bicycle Facilities are not included in this section.
- 57) Page 432 - Biological Resources, line 4
Delete the word, "County," so that the phrase reads, "City of Santa Barbara Local Coastal Plan."
- 58) Page 448 - Greenhouse Gas Reduction Strategies, 3rd bullet
Will the overall biomass of the replacement vegetation equal that removed by the project? If not, the planting will only partially offset the removal of mature vegetation.
- 59) Page 450 - Sea Level Rise Paragraph 1, line 6.
Has the report been released? Update either way.
- 60) Page 461 - Design Life of the Proposed Project
Why do the bridges have a design life of 50 years? Considering the planning time and expense of the project, a longer design life may be more appropriate.

City of Santa Barbara

General Response

Throughout its project development process, Caltrans seeks consistency with the California Coastal Act and local coastal plans. Caltrans recognizes and appreciates the need for a Coastal Development Permit and Local Coastal Plan Amendments so that this project gains the necessary approvals.

Through careful consideration of the current environment and thoughtful design, Caltrans has worked to tailor the project to avoid or minimize coastal impacts as much as possible. This has been achieved by extensively studying the project area, obtaining many exceptions to the standard design requirements, adjusting the pavement width in consideration of resources, and following the Caltrans soundwall protocol which determines whether soundwalls are reasonable or feasible. Further along in this project's process, as Caltrans refines its details, Caltrans staff will work with the City of Santa Barbara to address the requirements of the California Coastal Act and the Local Coastal Plans.

Caltrans and the project team understand and respect the visual importance of the Cabrillo-Hot Springs Interchange to the City of Santa Barbara and other communities. In addition to sensitive project planning and design features included in the project alternatives and configurations, the draft environmental document identified 31 mitigation measures to reduce visual impacts at the Cabrillo-Hot Springs Interchange and project corridor. The project will be designed to preserve as much existing vegetation as possible. Where existing vegetation cannot be preserved, the project will be re-landscaped to the greatest extent possible considering safety and maintenance requirements. Refinement of aesthetic and landscaping design details, although not required to meet the intent of mitigation, will be developed in collaboration with representatives of each affected community. In addition, each permitting jurisdiction may require additional measures

beyond the California Environmental Quality Act-required mitigation identified in the Draft (now Final) Environmental Impact Report/Environmental Assessment.

Some local agencies combine their California Environmental Quality Act and Coastal Permitting processes. This is appropriate for agencies with a Local Coastal Plan and lead agency status under the California Environmental Quality Act. In the case of this project, Caltrans is lead under the California Environmental Quality Act and, as a state agency, adheres to an established state process in which the California Environmental Quality Act and the California Coastal Act are addressed separately.

The HOV lanes proposal is one project in a larger consensus-approved package of improvements that came out of the Santa Barbara County Association of Governments-sponsored *101 In Motion* process. This larger package, which has since been further funded through the Measure A local transportation sales tax measure and included as planned improvements in the 2013 Regional Transportation Plan, provides a multimodal approach to long-term congestion relief in this corridor. In relation to the HOV project alternatives, the No-Build Alternative would result in decreased coastal access due to increased delays on U.S. 101, the main travel artery in the region. Pedestrian traffic and bicycle traffic are prohibited on U.S. 101 in the project area. However, the project would maintain or improve any bicycle or pedestrian facilities on the local street system that would otherwise be directly affected by the project. Caltrans will coordinate with the City of Santa Barbara and Santa Barbara County Association of Governments in the endeavor to replace the existing Union Pacific Railroad bridge near the Cabrillo Boulevard Interchange. Also, Caltrans will work with our local partners and Coastal Commission staff during the Coastal Development Permit process to address any needed Local Coastal Plan Amendments.

City of Santa Barbara**Comment 1 Summary Table**

- a) As part of the revisions to the final environmental document, the summary impact table was separated into two tables (see Tables S.1 and S.2). Impacts requiring mitigation are listed along with a summary of related measures. Impacts to visual resources/aesthetics and cumulative impacts to visual resources remain significant after incorporating mitigation.
- b) Per your request, wetland and riparian impacts were broken out for each jurisdiction and are included below. Typically, this information is not broken down by jurisdiction in acres, but quantified for the entire project. As these numbers are refined during final design, they will be made available as part of the coastal development process.

Carpinteria (PM 1.4 - 4.59)

Resource Type	Alternative 1		Alternative 2		Alternative 3	
	Temp	Perm	Temp	Perm	Temp	Perm
Coastal Wetlands roadside drainage features	0.249	0.160	0.249	0.349	0.249	0.160
Creek beds (Franklin, Santa Monica)	0.182	0	0.182	0	0.182	0
Riparian	0	0	0	0	0	0

Toro Canyon (PM 4.59 - 7.1)

Resource Type	Alternative 1		Alternative 2		Alternative 3	
	Temp	Perm	Temp	Perm	Temp	Perm
Coastal Wetlands roadside drainage features	0.053	0.030	0.049	0.034	0.053	0.030
Creek bed (Arroyo Paredon, Toro Canyon)	0.152	0	0.152	0	0.152	0
Riparian	0.082	0	0.082	0	0.082	0

Summerland (PM 7.10 - 8.87)

Resource Type	Alternative 1		Alternative 2		Alternative 3	
	Temp	Perm	Temp	Perm	Temp	Perm
Coastal Wetlands roadside drainage features	0	0	0	0	0	0
Creek bed (Greenwell)	0.006	0.042	0.006	0.042	0.006	0.042
Riparian	0.099	0.030	0.099	0.030	0.099	0.030

Montecito (PM 8.87 - 10.53)

Resource Type	Alternative 1		Alternative 2		Alternative 3	
	Temp	Perm	Temp	Perm	Temp	Perm
Coastal Wetlands roadside drainage features	0	0	0	0	0	0
Creek bed (Romero, San Ysidro, Oak)	0.074	0	0.074	0	0.074	0
Riparian	0.012	0	0.012	0	0.012	0

Santa Barbara (10.53 - 12.3) – No Impacts

City of Santa Barbara

Comment 2 Background

Per your comment, the final environmental document was revised to reflect the fact that the Milpas to Hot Springs Operational project is now completed.

City of Santa Barbara

Comment 3 Background

See response to comment 2 above.

City of Santa Barbara

Comment 4 Cabrillo Interchange Variations

- a) Cost information was provided to inform the public of the cost for each alternative.
- b) The City of Santa Barbara has taken the lead to study the replacement of the Union Pacific Railroad (UPRR) bridge and provide bicycle and pedestrian improvements within UPRR and City right-of-way. SBCAG has identified the UPRR bridge as a high priority project for funding. That project is being handled separately from the South Coast 101 HOV project and will have its own environmental document.
- c) The F configuration proposes to maintain the existing alignment of the northbound lanes. The northbound structure would be widened on both sides, so the bridge was planned for replacement. The alignment of the southbound lanes is proposed to be shifted nearer to the center of the existing right-of-way to provide sufficient room to add right-side southbound on- and off-ramps. This would result in a smaller separation in the median than currently exists. It also requires replacement of the existing southbound structure in the new location. The Hermosillo ramp would remain open as the only northbound off-ramp.

The F Modified configuration proposes new alignments for both northbound and southbound freeway lanes to be located near the center

of the existing right-of-way with a minimum separation in the median. This is necessary to allow sufficient room for standard right-side ramps for both directions of traffic. This requires replacement of both existing structures. The Hermosillo ramp would remain open.

The M and M Modified configurations propose maintaining the existing location of the southbound lanes. The existing southbound structure would be slightly widened to the outside to provide for a new southbound on-ramp at Los Patos Way. This would require removing the existing northbound structure and replacing it in the new location. The only difference between the two is that the M configuration proposes to close the ramp at Hermosillo, while the M Modified configuration proposes to maintain the existing ramp at Hermosillo.

The J configuration combines the features of the M and M Modified configurations in the southbound direction and features of the F configuration in the northbound direction. It requires the northbound structure be widened on both sides, so the bridge was planned for replacement. The existing southbound interchange structure is planned for widening at Cabrillo Boulevard. The Hermosillo ramp would remain open as the only northbound off-ramp.

City of Santa Barbara

Comment 5 Section 1.3.3

The alternatives noted in Section 1.3.3 are a result of the *101 In Motion* report that studied long-term solutions to the growing congestion throughout the U.S. 101 corridor in Southern Santa Barbara County. As a result of the 101 In Motion process (see Section 1.3.3 of the draft environmental document), an HOV lane was one of the solutions in a package designed to relieve congestion. The other three main components in the package were providing commuter rail, increasing bus services, and Transportation Demand Management. The *101 In Motion* report concluded that Transportation

Demand Management solutions that did not include adding a lane on U.S. 101 were found to be inadequate in reducing long-term congestion in this corridor.

City of Santa Barbara

Comment 6 Comparison of Alternatives

The options studied for the Cabrillo Boulevard/Hot Springs Road Interchange are considered variations; they have been compared appropriately in terms of traffic circulation, visual elements, right-of-way issues, and potential impacts to resources. In respect to other resource areas, early assessments identified only minor differences between the five interchange configurations and the determination was made that further configuration specific conclusions were not warranted.

City of Santa Barbara

Comment 7 Permits and Approvals Needed

Table 1.3, Permits and Approvals Required, has been updated in the final environmental document to include the Historic Landmarks Commission and Architectural Board of Review.

City of Santa Barbara

Comment 8 Consistency with State, Regional and Local Plans

- a) A policy consistency analysis was conducted for the project, however a matrix is not included in the environmental document. The statement in Section 2.1.1.2 of the final environmental document was revised to correct this error.
- b) Section 2.1.1.2 was revised to include the adoption of the City's General Plan update in December 2011 and add the County of Santa Barbara's Bicycle Master Plan, City of Santa Barbara's Pedestrian Master Plan, and

the Santa Barbara County Association of Governments Regional Bicycle Plan.

- c) As noted in the general response to the City of Santa Barbara and Coastal Commission, Caltrans acknowledges that the project will go through the Coastal Development Permit process and there will be further refinements needed including potential enhancements. The South Coast 101 HOV Lanes project does not include the separately funded bicycle/pedestrian trails being initiated by Santa Barbara County Association of Governments. Where there are direct impacts to existing sidewalks/trails, they will be replaced in-kind and meet the Americans with Disabilities Act standards.

No utility poles currently exist within the project limits of the freeway in the City of Santa Barbara; therefore, no undergrounding analysis was done. Caltrans has a strict policy that freeways will have no longitudinal encroachments (i.e., utility lines whether underground or overhead). For this project, all nearby utility pole lines are located on adjacent local roads that are outside of the highway right-of-way and outside the project limits. Undergrounding of utilities would need to be considered with future development permits associated with those local agency roadways.

City of Santa Barbara

Comment 9 Environmental Consequences of Build Alternatives

Revisions have been made to Section 2.1.1.2 Consistency with State, Regional and Local Plans to include any additional applicable policies that the project may not be consistent with.

The 101 HOV project will improve travel time on a large stretch of U.S. 101, which would represent a regional benefit and enhance access to coastal resources. Some local intersections may see added traffic as a result of improved travel time on U.S. 101, which would lead to vehicles arriving at

their destinations quicker. Overall vehicle travel time will still improve with the project whenever there will be a combination of highway and local road travel because the local road delays are minor compared to the improved highway travel times.

City of Santa Barbara

Comment 10 Environmental Consequences of Build Alternatives

The final environmental document has been revised to cite that the City of Santa Barbara U.S. 101 Coastal Parkway Design Guidelines identify median landscape widths.

City of Santa Barbara

Comment 11 Environmental Consequences of Build Alternatives

The correction has been made to the final environmental document. It now refers to the City of Santa Barbara U.S. 101 Coastal Parkway Design Guidelines instead of the County.

City of Santa Barbara

Comment 12 Potential Policy Inconsistencies

The policy was updated to refer to the City of Santa Barbara's Local Coastal Plan.

City of Santa Barbara

Comment 13 Park and Recreational Facilities

The table includes only publicly owned park and recreational facilities. The Country Club is privately owned.

City of Santa Barbara

Comment 14 Parks and Recreation—Environmental Consequences

Although there may be increased delay at some local intersections, access to parks and recreational facilities would improve with the quicker travel time on

the highway when vehicles use a combination of highway and local road travel to access those locations.

City of Santa Barbara

Comment 15 Growth

Your comment refers to a statement relative to the unconstrained growth analysis. This type of analysis removes growth constraints such as planned population capacity and only considers accessibility to jobs. When planned growth is removed from the model, Santa Barbara's growth pressure decreases, which results in an increase in residential growth. This situation offsets the growth pressure in Ventura whereby the decrease in growth pressure in Ventura is less than 3%.

The Growth Study was prepared prior to the release of the City of Santa Barbara's General Plan that was adopted in December 2011. Ventura's growth was not used in the constrained analysis because the City of Ventura's General Plan projected growth to only 2020. However, as the study suggests, the City of Ventura would not exceed planned growth for the area. Although the Ventura General Plan projected growth to only 2020, Caltrans assumed the same projected growth rate of for 2030 and 2040 since Ventura is nearing its build out capacity of 95% in 2020. In addition, the City of Ventura is committed to Smart Growth which focuses on infilling development within existing developed areas.

City of Santa Barbara

Comment 16 Community Impacts

Alternative 1 has been selected as the preferred alternative, and F Modified has been selected as the configuration for the Cabrillo Interchange. Configurations F and J both included a northbound on-ramp but no off-ramp. As described in Section 2.1.5 of the draft environmental document these configurations would have resulted in traffic previously using the northbound

Cabrillo Boulevard off-ramp to divert to Hermosillo Road, Milpas Street and Garden Street northbound off-ramps. However, with the selection of the F Modified alternative those diversions would not happen.

City of Santa Barbara

Comment 17 Traffic and Transportation/Pedestrian and Bicycle Facilities

a) The Forecast Operations Report (originally prepared October 19, 2009, and amended December 9, 2011) and the Cabrillo/Hot Springs Interchange Configuration Analysis Technical Memorandums (March 21, 2011 and July 19, 2011) were prepared as part of the traffic technical studies to support the draft environmental document. The studies were made available to the public via the project website on the internet, in the form of a CD as part of the draft environmental document placed in several area libraries, and could be requested as part of the records request process. Because the traffic studies are lengthy and are incorporated by reference, only significant traffic impacts resulting from the project were included in the draft environmental document. This is in keeping with CEQA Guidelines that encourage agencies to disclose key environmental issues only and to eliminate unneeded bulk in an Environmental Impact Report [Section 15132 and 15141].

The Forecast Operations Report (amended December 9, 2011) did not characterize traffic impacts as being significant environmental impacts under the California Environmental Quality Act (CEQA) or the National Environmental Policy Act (NEPA). Project-level impacts and cumulative-plus-project impacts were identified in the project traffic studies, however having an impact does not automatically make the impact significant under CEQA or NEPA.

Although local agencies may set their own thresholds for determining CEQA significance for local projects, when determining significance under

CEQA, the State considers the type of project proposed—a congestion relief project in this case—and the degree of increased delay at spot locations relative to the overall congestion relief benefits of the project.

The purpose behind this project is to improve poor travel conditions that exist and are projected to worsen under a no-build scenario on U.S. 101 in the South Coast while also encouraging a mode shift to carpooling and transit. The delay changes at the above-referenced locations are largely the result of travelers having the ability to travel at times under the build condition that they would find problematic under no-build conditions. Based on the traffic analysis, this change in travel patterns provides for delay reduction at some intersections while adding delay in others.

The final determination by Caltrans was that the impacts identified in the traffic studies do not reach a level of significance that requires mitigation. This determination is rooted in the fact that the purpose and need for the HOV project is to provide significant daily congestion relief in the larger corridor and the traffic studies demonstrate that this overall congestion relief is achieved by the project (the project is anticipated to result in nearly 14,000 person hours of delay savings daily in 2040). Intersections outside the project limits where some increases in delay are projected to occur under a build scenario are tradeoffs associated with the project and are not significant in comparison to the overall level of congestion relief achieved by the project.

b) Caltrans supports City and County planning efforts to improve these intersections and will coordinate with City and County staff to study appropriate improvement options. However, Caltrans has no plans to improve these intersections as part of the South Coast 101 HOV Lanes project.

Three Olive Mill intersections were analyzed as part of the traffic studies conducted for the project: Northbound off-ramp/Olive Mill (#39), North Jameson Lane/Olive Mill (#39a) and Southbound on-ramp/Olive Mill (#40). The table below shows levels of service (LOS) and the seconds of delay for configurations F and F Modified as reported in the Cabrillo/Hot Springs Interchange Configuration Analysis Technical Memorandums (March 21, 2011 and July 19, 2011). This information supersedes the values shown in the Forecast Operations report as the superseding reports provide outputs related to specific Hot Springs/Cabrillo configurations.

ID		Existing Condition	2040 No-Build	2040 Build
39	NB off-ramp/ Olive Mill	D/31.3s -AM C/16.6s -PM	E/37.9s -AM E/47.9s -PM	E/37.9s -AM E/47.9s -PM
39a	North Jameson Lane/ Olive Mill	C/15.4s -AM B/11.4s -PM	C/20.1s -AM C/16.7s -PM	C/20.1s -AM C/16.7s -PM
40	SB on-ramp/ Olive Mill	B/14.7s -AM B/14.4s -PM	C/17.1s -AM F/66.6s -PM	C/15.1s -AM E/38.1s -PM

Level of Service (LOS) identified by letter grades, "s" = seconds

As noted in the table above, 2040 build conditions are projected to be the same or better than 2040 no-build conditions at these intersections. Impacts were identified in the traffic studies at this location since the LOS values were lower than "C" in the forecast year. Having an impact does not automatically make the impact significant under Caltrans criteria or CEQA criteria, and the project traffic studies did not identify changes as significant environmental impacts under CEQA. Although local agencies may set their own thresholds for determining CEQA significance for local projects, when determining significance under CEQA, the State considers the type of project proposed—a congestion relief project in this case—and the degree of increased delay at spot locations relative to the overall congestion relief benefits of the project.

As identified in Section 2.1.5 of the draft environmental document and the California Environmental Quality Act checklist in Appendix A, these impacts were considered to be less than significant per the California Environmental Quality Act. Improvement of those intersections is outside the scope of this project and should be addressed separately.

c) Circulation at the Cabrillo Interchange:

- i. At the time the existing condition was analyzed in 2008, the Cabrillo southbound on-ramp still existed. Therefore, no adjustment is needed for what is assumed to be the existing condition. Under the 2040 no-build scenarios, the Cabrillo southbound on-ramp was removed to simulate the Milpas to Hot Springs Operations Improvement project as completed.
- ii. A series of technical meetings was held in the fall of 2013 involving Caltrans, City and SBCAG staff related to Cabrillo interchange operations. This involved evaluation of 2040 conditions for Cabrillo Boulevard related to the South Coast 101 HOV lanes "F Modified configuration" features at the northbound and southbound ramp junctions with Cabrillo Boulevard. These assessments took into account lane configuration and bike/pedestrian facility expectations associated with the future replacement of the UPRR structure over Cabrillo Boulevard. Through this coordination, refinements were made with respect to lane configurations in the interchange, future year northbound on-ramp volumes, as well as anticipated pedestrian movements through the interchange. The Preferred "F Modified" interchange configuration includes refinements recommended by City staff through this coordination.

Based on the traffic analysis for 2040, the Level of Service at the intersection of the southbound ramps and Cabrillo Boulevard for Configuration F would be B/24.7s (AM) and C/30.8s (PM). With the Preferred F Modified configuration, the 2040 Level of Service operations at this intersection would be B/17.3(AM) and C/21.0s (PM). Under these scenarios, there is an increase in the northbound or eastbound (traffic coming from the beach/harbor area) direction queue from future baseline to build on Cabrillo Boulevard. For configuration F, the queue increases by 191 feet in 2040, which translates to approximately eight vehicles over the baseline condition. The queue for F Modified increases by 118 feet in 2040, which translates to approximately five vehicles over the baseline condition.

The City of Santa Barbara and SBCAG are working jointly to study the replacement of the railroad bridge and provide improved bicycle and pedestrian access along Cabrillo Boulevard in the Union Pacific and City rights-of-way. SBCAG has provided funding for the preliminary design work and will continue seeking additional funds. This project is being handled separately from the South Coast 101 HOV project and will have its own environmental document. This project could add an additional right-turn lane on Cabrillo, which will help improve operations and further shorten the queue on northbound Cabrillo.

iii. Please see response in c) ii above.

- d) The traffic diversion plan for 2040 did take into account the Milpas Operations Improvement project and the closure of the southbound on-ramp. Refer to the Traffic Diversion Rules, established in the Cabrillo/Hot Springs Road Interchange Configuration Analysis, dated March 21, 2011, pages 9 and 10.

City of Santa Barbara

Comment 18 Cabrillo Interchange Descriptions

Configuration F would remove the southbound off-ramp and replace it with a complete set of new southbound off-and on-ramps. A reference to Chapter 1 was added to Section 2.1.5 (Traffic) so that the reader could find the detailed descriptions of the five configurations for the Cabrillo Interchange.

City of Santa Barbara

Comment 19 Cabrillo Interchange—Primary and Secondary Intersections

As indicated in the definition of primary and secondary intersections in Section 2.1.5 under the Cabrillo Boulevard/Hot Springs Interchange heading, any intersection that will be physically altered by the design of a given Cabrillo/Hot Springs Interchange configuration is a primary intersection. Otherwise, it is considered a secondary intersection. While the Cabrillo/Los Patos intersection would see increased traffic volumes with selection of J, M or M Modified, the intersection was not proposed to be physically altered by the project design.

City of Santa Barbara

Comment 20 Cabrillo Interchange (Los Patos Way)

With selection of the F Modified configuration, the intersection will degrade from a level of service (LOS) “E” to “F” during peak hours in 2040 between no-build and build condition, based on the Highway Capacity Manual (HCM) Two Way Stop Controlled (TWSC) methodology.

The HCM two way stop control (TWSC) methodology does not effectively reflect the anticipated conditions for travelers on Cabrillo Boulevard as most users of this intersection would experience little to no delay. The HCM two way stop control (TWSC) intersection level of service (LOS) is based on worst approach control delay per vehicle and therefore provides a single output that does not represent travel conditions for other intersection users. Conversely,

all-way stop and signal controlled intersection LOS in the 2000 Highway Capacity Manual is based on weighted average control delay per vehicle. At the Los Patos/Cabrillo intersection, the low LOS value indicated by the TWSC methodology is based on a limited number of vehicles making left turns that would experience a 95th percentile queue of 2-4 vehicles in 2040 from the side streets. Vehicles traveling through the intersection on Cabrillo Blvd, however, would experience little to no control delay.

Under F Modified, if no further improvements were made at this intersection apart from this project, the average vehicle control delay in 2040 for vehicles that travel through this intersection would be 3.1 seconds/vehicle in the AM peak hour and 12.1 seconds/vehicle in the PM peak hour. Using a weighted average control delay methodology, this would represent a 2040 LOS value of “A” in the AM peak hour and LOS “B” in the PM peak hour. The northbound and southbound ramp junction intersection improvements associated with the preferred interchange configuration is also anticipated to reduce queuing that would otherwise extend back into the Los Patos/Cabrillo intersection during peak times under the 2040 no-build condition.

The City of Santa Barbara in coordination with SBCAG has initiated a project to replace the Cabrillo railroad structure, and a consultant has been hired to complete this work. The Santa Barbara County Association of Governments and the City are coordinating to identify ways to fully fund these improvements. Caltrans will coordinate with the Cabrillo Railroad Structure Replacement team in the design phase of the HOV Lanes project.

City of Santa Barbara

Comment 21 Los Patos/Cabrillo Intersection Mitigation

See above for responses to comments 19 and 20.

City of Santa Barbara

Comment 22 Bicycle and Pedestrian Routes

After release of the draft environmental document, discussions continued regarding the need to replace the Union Pacific Railroad bridge at Cabrillo Boulevard. The railroad bridge replacement would improve bicycle and pedestrian access along Cabrillo Boulevard at this location. This goal was to be achieved by a tunnel behind the Union Pacific Bridge abutment, but the improvement was determined not to be allowable by Union Pacific. This resulted in an outstanding coastal development permit requirement from the U.S. 101 Operational Improvement project (Milpas to Hot Springs).

The Santa Barbara County Association of Governments explored options to provide alternative measures within this area that could be constructed for costs similar to what was set aside for construction of the tunnel. After a decision by the City to discontinue consideration of these alternatives, it was decided that the City of Santa Barbara would take the lead in designing and constructing the bridge while working with SBCAG to acquire preliminary funding. This coordination led to an approved MOU between the two agencies on March 6, 2013. The MOU includes funding and assigns responsibility for the preliminary bridge design work to the City of Santa Barbara.

The City of Santa Barbara has hired HDR Engineering, a firm that has experience working with Union Pacific Railroad, to compete the preliminary design. On January 6, 2014, the SBCAG Executive Director sent a letter to the City Manager reiterating the history of improvement efforts in this area and the commitment by SBCAG to help fund the replacement of the UPRR Bridge over Cabrillo. At the January 16, 2014 SBCAG meeting, the SBCAG Board passed a motion related to the South Coast 101 HOV Lane project that clarified that the replacement of the UPRR Bridge, and related bicycle and pedestrian improvements, were to be given a high priority for funding.

The City/SBCAG project proposes to improve bicycle and pedestrian connectivity along Cabrillo Boulevard by replacing the Union Pacific Railroad structure over Cabrillo Boulevard, providing bike and pedestrian facilities on both sides of Cabrillo Boulevard and controlled pedestrian crossing opportunities at the Los Patos/Cabrillo Boulevard intersection. The Caltrans team has coordinated with City and SBCAG staff to ensure that F Modified can be designed in a manner that provides for bicycle, pedestrian, and vehicular connectivity when the SBCAG/City improvement project is completed.

The South Coast 101 HOV Lanes project will replace or improve bicycle and pedestrian facilities that exist within the State Highway right-of-way at this interchange. It is not anticipated to permanently affect parking, bicycle facilities or pedestrian facilities, including the Pacific Coast Trail. All pedestrian facilities within the project limits that are modified as part of this project would comply with the Americans with Disabilities Act (ADA). During construction, consideration would be given to bicycles, pedestrians, and persons with disabilities for continued access through construction areas. Any improvements considered as part of this project would be coordinated with adjacent project efforts to ensure continuity of bicycle and pedestrian facilities with adjacent City of Santa Barbara/SBCAG project efforts for bicycle and pedestrian facility improvements along Cabrillo Boulevard.

City of Santa Barbara

Comment 23 Cabrillo Interchange—Visual Simulations

Conceptual interchange configurations for the Cabrillo Boulevard/Hot Springs interchange were provided in Figures 2-12 through 2-17 (Section 2.1.6 Visual/Aesthetics) in the draft environmental document. Also included as OV-23 (Proposed Condition) in the draft environmental document was a photo-simulation and description of the proposed railroad profile as seen from Los Patos Way for Configurations J, M and M Modified. There was also an OV- 25 in the draft environmental document that showed the proposed conditions

for Alternatives 1, 2, and 3 and described the proposed railroad profile and its potential effect on views from U.S. 101.

Note: During the course of updating the environmental document, there may have been changes in figure and table numbers.

City of Santa Barbara

Comment 24 Photo of Existing Conditions at Cabrillo Interchange

An aerial is not currently available showing recent construction changes between Milpas Street and Hot Springs Road (101 Operational Improvement project). However, Figure 2-11 in the final environmental document is an accurate illustration of the existing conditions at the Hot Springs/Cabrillo interchange. It should be noted that the following five images (Figures 2-12 through 2-17) are concept-level illustrations that provide a clear understanding of the comparative differences between roadway configurations. Highway lanes, ramps, local roadway alignments, connections, and adjacent land uses are shown. The figures are not intended to show vegetation removal or potential replanting areas. Text has been added to Figures 2-11 through 2-15 of the final environmental document to clarify their intended purpose.

City of Santa Barbara

Comment 25 Visual Simulation OV-21—Configurations F, F Modified and M

- a) Figures 2-11 through 2-15 show the configuration of the roadway in the context of the surrounding region. Actual depiction of trees and specific plant material to remain and replanted is not intended. Text will be added to Figures 2-11 through 2-15 to clarify their use as overall road configurations only. Per CEQA Guidelines, the DEIR Visual/Aesthetics section analyzes and discloses a reasonable and foreseeable scenario regarding vegetation removal. The removal of skyline trees is caused by

different reasons for different project configurations. Configurations J, M and M Modified all have large retaining walls, widen Cabrillo undercrossing and change the grade of the railroad by approximately 4 feet. These retaining walls would all be very close to existing large eucalyptus. Configurations F and F Modified widen to the outside and have fewer retaining walls, but change the roadway from an bridge structure crossing over at Cabrillo to ramps connecting to it. All of this requires extensive grading. Most of the eucalyptus trees are within the footprint of this excavation and grading. Existing trees that are outside of the grading area are very close to it, and root impacts on extremely large trees would require their removal. There are two rows of trees on either side of the railroad tracks, the row south of the tracks is not as large and is set back much further from the freeway, as such these trees are shown in all the simulations.

- b) The analysis for Configuration M describes a reduction in visual quality as seen from OV-21, however no implication is made that the resulting visual quality would be below average. The numerical ratings developed as part of the FHWA process and provided in the Visual Impact Assessment technical document show that in spite of the reduction, visual quality of M Modified would remain slightly above average. This is similar to the findings for Configuration F Modified.
- c) As seen from OV-21, Configurations F and F-Modified are each correctly described as resulting a reduction in visual quality. The resulting visual quality of Configuration F is defined as remaining “above average,” and the resulting visual quality for Configuration F Modified is defined as “slightly above average.” This wording accurately represents the magnitude of numerical rating change for each configuration developed as part of the FHWA process and provided in the Visual Impact Assessment technical document. As stated in the analysis narrative for

each configuration, the post-project visual quality would remain above-average to varying degrees primarily because of the surrounding well-vegetated roadsides and community.

- d) Most of the eucalyptus trees are within the footprint of this excavation and grading. Existing trees that are outside the grading area are very close to it, and root impacts on extremely large trees would require their removal. There are two rows of trees on either side of the railroad tracks; the row south of the tracks is not as large and is set back much farther from the freeway. These trees are shown in all of the simulations.

City of Santa Barbara

Comment 26 Visual Simulation OV-22—Configurations F Modified, M and M Modified

- a) The photo-simulation for OV-22 will be revised to show trees planted in the vegetation strip between the proposed off-ramp and Cabrillo/Coast Village Road.
- b) The retaining wall associated with OV-22 extends from the structure east to past the roundabout, which cannot be entirely shown in the photo-simulation. The height of the retaining wall varies along its length, from full undercrossing height down to only 2 or 3 feet. The retaining wall would, however, have a barrier on top of its entire length. The wall shown in photo-simulation OV-22 has been corrected to show the accurate height of the bridge rail in the final environmental document.

City of Santa Barbara

Comment 27 Visual Simulation OV-23—Configurations J, M and M Modified

The Visual Quality Evaluation ratings showed that the existing visual quality at OV-23 is somewhat compromised by visually discordant elements, clutter and

lack of unity. As seen from this specific viewpoint, Interchange Configurations J, M, and M Modified were found to reduce visual quality more than others. None of these configurations was selected.

City of Santa Barbara

Comment 28 Visual Simulation OV-24—Configuration F

- a) The tree removal shown in OV-24 Configuration F results from constructing the new southbound off-ramp. The proposed edge of ramp pavement would widen approximately 18 feet closer to the southern trees at the widest point. As seen from this location, much of the actual off-ramp is screened from view by low vegetation between the mainline and the ramp.
- b) The Visual/Aesthetics section in the draft environmental document was prepared according to Federal Highway Administration visual impact assessment criteria, including the rating of observer viewpoints by a multi-jurisdictional, multi-disciplinary team. The team ratings showed a moderately substantial reduction in visual quality at this viewpoint. The process also revealed that despite project changes, much of the existing vegetation, particularly in the adjacent community, would remain. With existing vegetation combined with a modest level of re-landscaping, the view would still retain some degree of vegetative character, unity and visual quality.

City of Santa Barbara

Comment 29 Visual Simulation OV-24—Configuration F Modified

- a) The photo-simulation for OV-24 accurately shows the physical changes to the view and specifically discloses on page 190 of the draft environmental document that “views to the northbound lanes would increase, resulting in a more urban visual character.”

- b) The simulation for OV-24 accurately shows the proposed condition, and the numerical ratings consider the narrower median width. No change in the statement is necessary.
- c) The Visual/Aesthetics section of the draft environmental document was prepared according to Federal Highway Administration visual impact assessment criteria, including the rating of observer viewpoints by a multi-jurisdictional, multi-disciplinary team. The team ratings showed a moderately substantial reduction in visual quality at this viewpoint. The rating process also revealed that despite project changes, much existing vegetation, particularly in the adjacent community, would remain. With existing vegetation combined with a modest level of re-landscaping, the view would retain some degree of vegetative character, unity and visual quality.

City of Santa Barbara

Comment 30 Visual Simulation OV-24—Configuration J

The reduction in skyline trees shown in OV-24 Configuration J is shown because a retaining wall is proposed at this location behind the existing skyline trees. The existing skyline trees would be removed by the future roadway alignment. The environmental document Visual/Aesthetics section analyzes and discloses a reasonable worst-case scenario on vegetation removal and replanting.

City of Santa Barbara

Comment 31 Visual Simulation OV-24—Configuration M

The reduction in skyline trees shown in OV-24 Configuration M is caused by a retaining wall that is proposed at this location, behind the existing skyline trees. The existing skyline trees would be removed to make way for the expanded roadway alignment. The Visual/Aesthetics section in the environmental document analyzes and discloses a reasonable worst-case scenario on vegetation removal and replanting.

City of Santa Barbara

Comment 32 Visual Simulation OV-24A—Configuration F

- a) Figures 2-12 through 2-17 are concept-level illustrations that show comparative differences between the roadway configurations. Highway lanes, ramps, local roadway alignments, connections, and adjacent land uses are shown. The figures are not intended to show vegetation removal or potential replanting areas. Text has been added to section 2.1.6 in the final environmental document to clarify their intended purpose.

Tree removal in OV-24A Configuration F is caused by the new off-ramp. It would not be built in the same location as the southbound lanes. The edge of pavement widens about 18 feet to the south at the widest point. Note that the solid white line right of center in the simulation in the existing condition corresponds roughly to the left side of the new off-ramp. Also note in the simulation, the new retaining wall and the difference in grading as the ramp descends to the elevation of Cabrillo Boulevard. The environmental document Visual/Aesthetics section analyzes and discloses a reasonable worst-case scenario on vegetation removal and replanting.

- b) The Visual/Aesthetics section of the draft environmental document was prepared according to Federal Highway Administration visual impact assessment criteria, including the rating of observer viewpoints by a multi-jurisdictional, multi-disciplinary team. The team ratings showed a moderately substantial reduction in visual quality at this viewpoint. The rating process also revealed that despite project changes, much existing vegetation, particularly in the adjacent community, would remain. With the existing vegetation combined with a modest level of re-landscaping, the view would retain some degree of vegetative character, unity and visual quality.

City of Santa Barbara

Comment 33 Visual Simulation OV-24A—Configuration F Modified

- a) Figures 2-12 through 2-17 are concept-level illustrations that show comparative differences between roadway configurations. Highway lanes, ramps, local roadway alignments, connections, and adjacent land uses are shown. The figures are not intended to show vegetation removal or potential replanting areas. Text has been added to section 2.1.6 in the final environmental document to clarify their intended purpose.

See response to comment 32(a) for information related to tree removal.

- b) The photo-simulation for OV-24A Configuration F Modified accurately shows the physical changes to the view and specifically discloses in the text beneath the photo that “Views across to the northbound lanes of traffic as well as the railroad tracks to the south would be increased.”
- c) The Visual/Aesthetics section of the draft environmental document was prepared according to Federal Highway Administration visual impact assessment criteria, including the rating of observer viewpoints by a multi-jurisdictional, multi-disciplinary team. The team ratings showed a moderately substantial reduction in visual quality at this viewpoint. The rating process also revealed that despite project changes, much existing vegetation, particularly in the adjacent community would remain. With the existing vegetation and combined with a modest level of re-landscaping, the view would still retain some degree of vegetative character, unity and visual quality.

City of Santa Barbara

Comment 34 Visual Simulation OV-24A

- a) The photo-simulations for OV-24A Configurations J, M, and M Modified clearly and accurately show the southbound retaining wall and specifically disclose that: “A retaining wall would be required along the southbound lanes to fit the new southbound Los Patos on-ramp between the highway and the adjacent railroad track” and “The most noticeable characteristics of configuration J at this location would be the retaining wall, the loss of the left-hand off-ramp, the wider expanse of pavement, and the reduction of mature landscaping and skyline trees.”
- b) The median for Configurations M and M Modified is up to 67 feet wide, but tapers down to a single barrier near the location of viewpoint OV-24A (for a short period, then it widens back out to 10 feet). The photo-simulation for OV-24A Configurations M and M Modified have been revised in the final environmental document to show less median planting in the foreground. The text associated with OV-24A Configurations J, M, and M Modified accurately describes the visual changes in terms of a reduction in median planting, an increase in views of the northbound lanes, and a resulting increase in urban visual character. The draft environmental document Visual/Aesthetics section was prepared according to Federal Highway Administration visual impact assessment criteria, including the rating of observer viewpoints by a multi-jurisdictional, multi-disciplinary team. When rating this viewpoint, the team realized the context of the specific view, including the varying extent of median planting in this area. The rating considered the fact that some of the median planting in this section would be substantial and that one section would be not accommodate it. With that understanding, the team ratings showed a moderately substantial reduction in visual quality at this viewpoint. The rating process also revealed that despite project changes, much existing vegetation, particularly in the adjacent community, would

remain. With the existing vegetation combined with a modest level of re-landscaping, the view would still retain some degree of vegetative character, unity and visual quality.

City of Santa Barbara

Comment 35 Visual/Aesthetics Impacts—Configuration F Summary

The Visual/Aesthetics section of the draft environmental document was prepared according to Federal Highway Administration visual impact assessment criteria, including the rating of observer viewpoints by a multi-jurisdictional, multi-disciplinary team. The team ratings showed a moderately substantial reduction in visual quality at this viewpoint. The rating process also revealed that despite project changes, much existing vegetation, particularly in the adjacent community, would remain. With the existing vegetation combined with a modest level of re-landscaping, the view would still retain some degree of vegetative character, unity and visual quality.

California Environmental Quality Act and National Environmental Policy Act guidance on the assessment of visual resources requires that the potential viewer groups be considered when determining the extent of impacts. The sensitivity of the local community regarding changes to the visual environment is discussed, acknowledged, and factored into the draft environmental document Visual/Aesthetics section. In addition, however, viewers from outside the adjacent communities must also be considered. From this perspective, it is important to note that most viewers’ expectations would be based on the understanding that they are in a freeway environment. As a result, to many casual observers, the completed project and highway corridor would likely appear as an “above average” freeway traveling experience in terms of visual quality.

City of Santa Barbara

Comment 36 Visual/Aesthetics Impacts—Configuration F Modified Summary

a, b and d) Refer to the response to comment 35.

c) The final environmental document Visual/Aesthetics section will correct this typographical error from “configuration M” to “Configuration F Modified.”

City of Santa Barbara

Comment 37 Visual/Aesthetics Impacts—Configuration J Summary

Refer to the response to comment 35.

City of Santa Barbara

Comment 38 Visual/Aesthetics Impacts—Configuration M Summary

Refer to the response to comment 35.

City of Santa Barbara

Comment 39 Visual Simulation OV-25 Existing Condition

The photographs for OV-25 have been revised in the final environmental document to show current and proposed conditions.

City of Santa Barbara

Comment 40 Visual Impact Ratings

The Visual/Aesthetics section of the draft environmental document includes a thorough summary analysis of the project’s potential visual effects. The Visual Impact Assessment technical supporting document is bound separately as shown in the draft environmental document Table of Contents. Consistent with the Federal Highway Administration methodology, the Visual Impact Assessment includes complete technical rating criteria, numerical equations, evaluations, and definitions.

Based on California Environmental Quality Act Guidelines, National Environmental Policy Act guidance, the extent of physical changes, and expected viewer sensitivity based in part on local visual policy, the draft environmental document determined the following: “Implementation of the project would result in substantial visual changes throughout much of the highway corridor due to loss of vegetation, increased paving, and potential soundwalls. Mitigation measures, combined with proposed project features such as replacement landscaping and aesthetic treatments to walls, would lessen the adverse visual change to the corridor. However, because of the inherent alteration of scale, increase of hard surface, and loss of vegetative character, substantial adverse visual impacts would remain.” Refer to the Summary of Project Impacts (subsection of Section 2.1.6).

In addition, the draft environmental document included 31 mitigation measures related to reducing potential impacts to coastal visual resources. Identified mitigation measures are related to specific impacts, consistent with project purpose and need, are implementable and feasible, and are consistent with state and national safety design practices. All aesthetic design elements, landscaping and visual mitigation will be further developed in collaboration with representatives of each affected community, in addition to a thorough review by the permitting jurisdiction. Refer to Avoidance, Minimization, and Mitigation measures in Section 2.1.6.

City of Santa Barbara

Comment 41 Visual/Aesthetics Impacts—Avoidance, Minimization, and/or Mitigation Measures

a) and b) The Visual/Aesthetics section of the draft environmental document text analysis and photo-simulations provide a thorough disclosure of the project’s potential effects. Using consistent language, the analysis describes the magnitude of changes associated with each alternative, as

well as comparisons between alternatives. Appropriately, the section summary clearly disclosed substantial adverse visual impacts related to the project Summary of Project Impacts (subsection of Section 2.1.6). This finding was stated again in Table S.1. Visual impacts were also identified under Section 3.2.5, Unavoidable Significant Environmental Effects. Also, in Appendix A, the California Environmental Quality Act Checklist stated that the project would result in Potentially Significant Impacts for visual resources, would have a substantial adverse effect on a scenic vista, would substantially damage scenic resources, and would substantially degrade the existing visual character or quality of the site and its surroundings.

- c) The avoidance, minimization and mitigation measures listed in Section 2.1.6 and Appendix F specifically included measures related to all bridge structures, walls, median barriers, and landscaping, as well as other features. Refinement of aesthetic and landscaping design details, although not required to meet the intent of mitigation, will be developed in collaboration with representatives of each affected community. Each permitting jurisdiction may require additional measures beyond the California Environmental Quality Act-required mitigation identified in the draft environmental document.

City of Santa Barbara

Comment 42 Cultural Resources—Regulatory Setting

Caltrans sent a copy of the three-volume Historic Property Survey Report, which included project-related archaeological and architectural technical studies, to Mr. Jake Jacobus of the City of Santa Barbara Historic Landmarks Commission on March 3, 2011 (refer to Chapter 4). Caltrans also sent a letter to Mr. Jacobus on April 7, 2011, advising him of Caltrans' Finding of Adverse Effect, due to project effects on the Via Real Redeposited Midden, and of concurrence of this finding from the State Historic Preservation Officer. On

October 22, 2012, Caltrans forwarded a copy of the February 2011 Finding of Adverse Effect (with the April 7, 2011, letter of concurrence from the State Historic Preservation Officer) and a copy of the September 2011 Revised Finding of Adverse Effect (with the November 16, 2011, letter of concurrence from the State Historic Preservation Officer) to the City of Santa Barbara Historic Landmarks Commission for your archives.

City of Santa Barbara

Comment 43 Cultural Resources

Under Stipulation VI.B of the January 2004 Programmatic Agreement Among the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and the California State Department of Transportation Regarding Compliance with Section 106 of the National Historic Preservation Act, As It Pertains to the Administration of the Federal-Aid Highway Program in California (the Programmatic Agreement), the Federal Highway Administration authorizes the Department of Transportation to carry out, among others, the following steps on its behalf:

- (2) Determine under 36 CFR 800.3(a) whether the undertaking [i.e., the project] is a type of activity that has the potential to affect historic properties.
- (7) Determine under 36 CFR 800.4 the undertaking's Area of Potential Effects, identify and evaluate properties within the Area of Potential Effects in order to determine their eligibility for the National Register of Historic Places, and determine whether historic properties may be affected by the undertaking.

Caltrans duly carried out its responsibilities under this stipulation, producing a three-volume Historic Property Survey Report that fulfilled three responsibilities under Section 106 of the National Historic Preservation Act: 1) determination of the Area of Potential Effects, 2) identification of cultural

resources located within the Area of Potential Effects, and 3) evaluation of those resources for eligibility to the National Register of Historic Places.

The Historic Property Survey Report was submitted to the State Historic Preservation Officer on November 4, 2010, and a copy of the entire Historic Property Survey Report was sent to the City's Historic Landmarks Commission on March 3, 2011. The report included a detailed map of the architectural Area of Potential Effects, as well as a written description of and rationale for the manner of delineating the architectural Area of Potential Effects. The discussion further documented that the Area of Potential Effects was revised and expanded on two separate occasions during architectural studies to accommodate design changes. The Second Supplemental Historical Resources Evaluation Report, in particular, was developed in response to project design refinements associated with the proposed construction of soundwalls, retaining walls and bridge structures. Consultation with the State Historic Preservation Officer resulted in concurrence with our eligibility determinations and no objection to the adequacy of the architectural Area of Potential Effects (November 4, 2010; January 26, 2011; February 2, 2011; and February 16, 2011).

The additional cultural resources to which you refer are not included in the Area of Potential Effects because there is no potential for project-related effects on these historic properties. If the project footprint should change in the future in a way that requires us to expand the study area and Area of Potential Effects, we will conduct any additional studies needed in conformity with our responsibilities under Section 106 of the National Historic Preservation Act and under the California Environmental Quality Act.

City of Santa Barbara

Comment 44 Water Quality and Storm Water Runoff and Water Quality Assessment

a-c) The State Water Resources Control Board has identified Caltrans as an owner/operator of a Stormwater Discharge From Municipal Separate Storm Sewer Systems (MS4) pursuant to federal regulations. Pursuant to the Federal Water Pollution Control Act (Clean Water Act) section 402(p), storm water permits are required for discharges from a municipal separate storm sewer system (MS4) serving a population of 10,000 or more. The U.S. EPA defines an MS4 as a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains) owned or operated by a State (40 CFR 122.26(b)(8)). The California Department of Transportation (Caltrans) is responsible for the design, construction, management, and maintenance of the State highway system, including freeways, bridges, tunnels, Caltrans' facilities, and related properties, and is subject to the permitting requirements of Clean Water Act section 402(p). The Caltrans MS4 permit covers all Caltrans rights-of-way, properties, facilities, and activities in the state. The MS4 permit contains the following requirements:

- Caltrans must implement a year-round program in all parts of the state to effectively control storm water and non-storm water discharges; and
- Caltrans storm water discharges must meet water quality standards through implementation of permanent and temporary (construction) best management practices (BMPs) to the Maximum Extent Practicable, and other measures as the State Water Regional Control Board determines necessary.

In addition to meeting the above water quality requirements, Caltrans will be required to obtain Coastal Development Permits from three local

jurisdictions, including the City of Santa Barbara. During the Coastal Development Permit process, when the project design is further refined, there will likely be additional water quality requirements. Any additional requirements will be addressed as part of that process.

- d) The description was updated in the final environmental document as follows: Sycamore Creek originates in the foothills of the Santa Ynez Mountains and drains a 2,360-acre watershed. Upstream, Sycamore Creek is characterized by a relatively deep channel with well-vegetated banks. The lower creek reaches are fairly flat, and the channel is mostly unvegetated with weedy species dominating creek banks. The creek bed is composed of boulders, cobble and silt. During most years, the lower portion of Sycamore Creek dries up from about Cacique Street downstream. At U.S. 101, Caltrans recently replaced the box culvert at Sycamore Creek with a bridge, allowing the natural creek bottom to be restored at this location. With the selection of F Modified there will be no work performed in Sycamore Creek or its watershed.

- e-f) As mentioned above, Caltrans is a Phase I (applies to cities with population over 100,000 people and Caltrans) MS4, with an established Statewide Storm Water Program, which includes the incorporation of design pollution prevention best management practices, permanent storm water treatment best management practices, post-construction runoff control requirements, all of which have been incorporated into all Caltrans projects and have been approved by the State Water Quality Regional Control Board.

City of Santa Barbara

Comment 45 Air Quality

- a) As stated in the South Coast 101 HOV Lanes project Traffic Study, page 56, “With the addition of an HOV lane, morning peak hour vehicle throughput

is projected to increase to over 3,900 vehicles in the northbound direction, a 14% increase over the No-Build condition. Peak period volumes are projected to increase by 11% over No-Build conditions. These increases are primarily the result of traffic diverting back on to the freeway that under the No-Build condition was avoiding heavy freeway congestion by utilizing local parallel facilities. Induced travel in the form of longer trip lengths or changed origin-destination pairs as a result of improved freeway accessibility is also present but determined to contribute less than 5% of additional trips (see South Coast 101 HOV Forecast Operations Report, October 2009 Revised December 2011). Only minor congestion is forecast at a few locations – primarily outside the project limits, with free flow conditions forecasted through most of the study area. Similar to the northbound morning peak hour period results and for similar reasons, the southbound afternoon peak hour and period throughput is projected to increase by 26% (3,660 to 4,618) and 22% (13,930 to 16,937) respectively over No-Build conditions. Free-flow conditions with only minor bottlenecks are projected.”

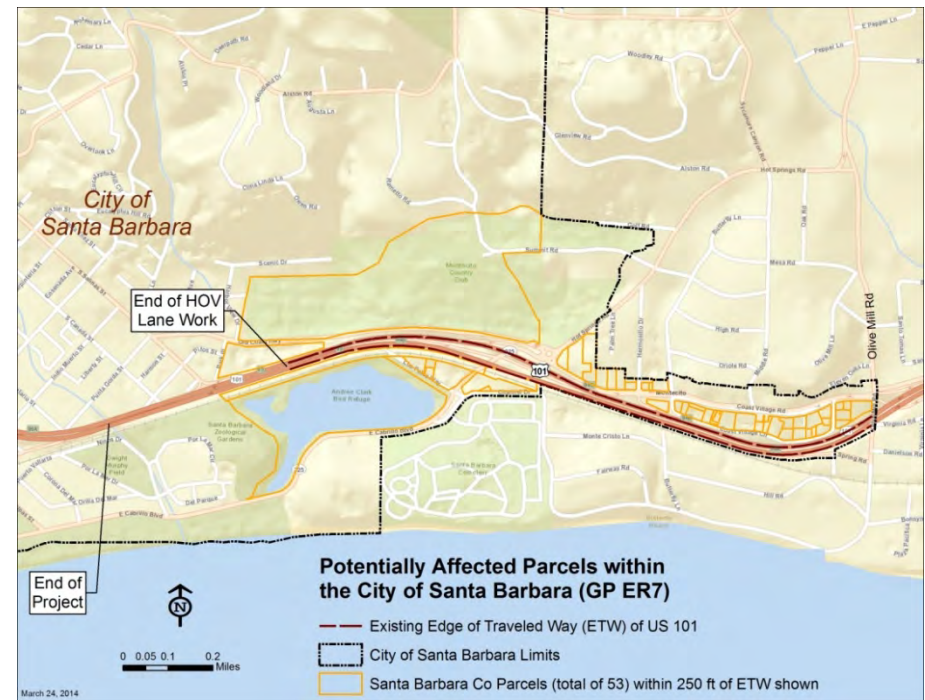
- b) Due to the size of this project and the volumes on U.S. 101, the delays at the three intersections pale in comparison with the congestion relief and added benefit to the traveling public within the project limits. As shown in the traffic study, three intersections will be affected (Linden Avenue/ Sawyer Avenue, Northbound on-and off-ramp/Via Real, and Via Real/Padaro Lane). The increase in delay per car at these intersections is 14 seconds, 34 seconds and 1 second, respectively. As shown in the traffic section in Table 2.16 when comparing the delay for the build and no-build in 2040, the delay time will be reduced by 29-40% in the peak hour, which equates to a 19.2-minute savings in travel time for the northbound traffic in the morning peak hour and a 10.2-minute savings in travel time for the southbound traffic in the afternoon peak hour. As shown in Table 2.17 of the draft environmental document, this would equate to a 62% reduction

in total hours of delay, which equates to 11,435 vehicle hours of delay reduction with the project.

City of Santa Barbara

Comment 46 Air Quality—Traffic Circulation

- a) Refer to the response to comment 45.
- b) As stated in the traffic study, the intersections analyzed were those that interface between the freeway and local connector streets. The few locations where an intersection may see added delay are as a result of a slight increase in traffic arriving to certain locations quicker due to less delay from the freeway. Because several traffic-related questions were raised during the comment period, additional information from the traffic studies has been provided in Section 2.1.5 of the final environmental document.
- c) The project will widen in areas within the median as well as to the outside of the existing lanes. The shift would be about 12 feet on either side of the freeway and would not affect the development potential of parcels next to the highway. The following map shows affected parcels within 250 feet of U.S. 101.



Note: Because several traffic-related questions were raised during the comment period, additional information from the traffic studies is now provided in Section 2.1.5 of the final environmental document.

City of Santa Barbara

Comment 47 Traffic Impacts

Please see response to comment #45. The purpose behind this project is to improve poor travel conditions that exist and are projected to worsen under a no-build scenario on U.S. 101 in the South Coast while also encouraging a mode shift to carpooling and transit. The delay changes at the above-referenced locations are largely the result of travelers having the ability to travel at times under the build condition that they would find problematic under no-build conditions. Based on the traffic analysis, this change in travel

patterns provides for delay reduction at some intersections while adding delay in others. The project is anticipated to result in nearly 14,000 person hours of delay savings daily in 2040. Intersections where some increases in delay are projected to occur under a build scenario are tradeoffs associated with the project and are not significant in comparison to the overall level of congestion relief achieved by the project.

According to the Air Quality Report prepared September 2011 and the addendum to the Air Quality Report prepared 2013, the project would not result in significant air quality impacts. Furthermore, since the project will relieve traffic congestion within the corridor, the additional HOV lane coupled with fleet turnover over time that meet the Environmental Protection Agency's vehicle and fuel regulations, the regional air pollution time would see a substantial decrease in mobile source air toxics. Refer to Volume I, Sections 2.2.6 and 2.5 in the final environmental document for discussion of air quality minimization measures and Caltrans Standard Specifications that would decrease operational air emissions during construction. Refer to Section 2.2.6 for discussion of entrained dust.

City of Santa Barbara

Comment 48 Air Quality

The following was stated on page viii in the summary table: "The proposed project, in combination with others, would reduce congestion through the U.S. 101 corridor and encourage car-pooling and public transportation with the introduction of HOV lanes. Bicycle and pedestrian facilities would be maintained in areas where construction occurs."

None of the three build alternatives would permanently affect parking, bicycle or pedestrian facilities, including the Pacific Coast Bike Route. The project would facilitate pedestrian and bicycle access by ensuring all existing paths are retained or replaced as necessitated by the project. The construction of

the overall six-lane facility would reduce diversion of through trips by vehicular traffic onto the local street system by those seeking to avoid U.S. 101 congestion. This reduction of through traffic onto the local streets is expected to benefit bicycle, pedestrian and local transit users that depend on the local street system for travel.

Where appropriate, mitigation information involving trees and vegetation is contained in the visual section. However, when the discussion is specifically tied to the loss of specific trees or habitat, refer to the discussion under biological resources.

City of Santa Barbara

Comment 49 Noise

Caltrans is lead agency on this project for both the California Environmental Quality Act and National Environmental Policy Act. Caltrans determines the significance of environmental impacts, including noise impacts, under the California Environmental Quality Act and National Environmental Policy Act criteria of context and intensity. Caltrans uses the Federal Highway Administration guidelines to determine when noise abatement must be considered, however that is not considered a threshold of significance. To maintain consistency statewide, Caltrans does not use local noise thresholds to determine the significance of noise impacts.

City of Santa Barbara

Comment 50 Visual/Aesthetics

The draft environmental document fully discloses the potential effects to landscaping associated with the Cabrillo Interchange configurations. The value of skyline trees, median planting and roadside landscaping is shown in photographs, photo-simulations, and numeric and narrative analysis in Section 2.1.6. Mitigation measures are specifically identified that relate to the loss and replacement of existing skyline trees.

City of Santa Barbara

Comment 51 Biological Study Area

The area was evaluated for all potential impacts in January 2011, including wetlands. This evaluation was included in the Natural Environment Study, dated January 2011. However, the biological study area mapping was not updated to reflect that evaluation, which was an oversight. That has been corrected in the final environmental document. A work window was proposed for Configurations M and J, prohibiting work between February 15 and September 1 near the refuge to avoid impacts to nesting birds. With the selection of the F Modified configuration for the Cabrillo Boulevard/Hot Springs Road Interchange, no impacts to the bird refuge are anticipated. The F Modified configuration will not build a Los Patos Way on-ramp or require work in the railroad right-of-way next to the Andree Clark Bird Refuge.

City of Santa Barbara

Comment 52 Construction Impacts

Most circulation and access impacts that might occur as a result of street closures and detours would be temporary and construction related. Two lanes in each direction of the freeway will remain open during construction. The long-term impacts of the project on transportation and vehicular traffic would generally be positive due to the reduction of traffic delay throughout the U.S. 101 project area. Transit providers would be notified of any road closures or detours. See Section 2.4 for a discussion on traffic circulation during construction.

City of Santa Barbara

Comment 53 Traffic and Transportation/Pedestrian and Bicycle Facilities

As indicated in the document, some delays were projected for a number of intersections in the year 2040. However, the project provides an overall benefit to local circulation as it removes traffic that otherwise traveled local

streets to avoid congestion on U.S. 101. With construction of the South Coast 101 HOV lanes project, some intersections are expected to see increased delays because vehicles can reach a location quicker, but long-term significant delays should not be attributed to the project. During construction, the Transportation Management Plan would address temporary impacts to bicycles and pedestrians as well as vehicles during those periods when access is limited.

City of Santa Barbara

Comment 54 Temporary Noise Impacts

The final environmental document was revised to correct the statement and make it clearer for the reader. It now reads: Doubling the distance towards the noise source increases the noise impacts by 6 dBA. Doubling the distance away from the noise source decreases the noise impacts by 6 dBA.

It should be noted that with the selection of the F Modified configuration, no temporary relocation of the railroad tracks is necessary.

City of Santa Barbara

Comment 55 Construction Impacts Avoidance, Minimization and/or Mitigation Measures

A Traffic Management Plan will be developed during the design phase of the project to address potential impacts on traffic flow during construction. The project's final design will ensure there are two lanes in each direction on U.S. 101 throughout construction, although some short-term mainline lane closures may be required for night work. Although some on- and off-ramps would be closed for part of the construction period in other areas of the project, significant traffic impacts are not expected within the City of Santa Barbara. Specific construction staging plans developed for the Cabrillo Boulevard Interchange Configuration F Modified allow for new ramp connections to be built before the closure of the ramps to be replaced.

Therefore, no ramp or local road closures are planned within the City of Santa Barbara for this project. See the updated discussion in Volume I, Section 2.4 (Construction Impacts) of the final environmental document.

The Traffic Management Plan for this project would include the following items:

- Public Awareness Campaign: Flyers, brochures, press releases, website, and advertising, as required to inform travelers of the project.
- Construction Zone Enhanced Enforcement Plan (COZEEP): Additional California Highway Patrol staff patrolling the construction zone during peak travel times to ensure construction zone safety.
- Damages to local streets that result from any freeway construction activities will be repaired.

City of Santa Barbara

Comment 56 Significant Environmental Effects of Proposed Project

Traffic and Transportation/Pedestrian and Bicycle Facilities were not added to the issues that fell into the significant environmental effects category. The final determination by Caltrans was that the impacts identified in the traffic studies do not reach a level of significance that requires mitigation. This determination is rooted in the fact that the purpose and need for the HOV project is to provide significant daily congestion relief in the larger corridor and the traffic studies demonstrate that this overall congestion relief is achieved by the project (the project is anticipated to result in nearly 14,000 person hours of delay savings daily in 2040). Intersections outside the project limits where some increases in delay are projected to occur under a build scenario are tradeoffs associated with the project and are not significant in comparison to the overall level of congestion relief achieved by the project. Refer to the discussion in Section 2.1.5 (Traffic).

City of Santa Barbara

Comment 57 Significant Environmental Effects - Biological Resources

The word “County” was deleted from Section 3.2.3, so it now reads “City of Santa Barbara Local Coastal Plan.”

City of Santa Barbara

Comment 58 Greenhouse Gas Reduction -Biomass

Although the replacement planting for the portions of mature vegetation removed as part of constructing the project may not occur in the very location from which it was removed, there will be a balanced approach to the replanting efforts for the South Coast 101 HOV Lanes project. Some areas currently have much less existing biomass compared to others and will see an overall increase in vegetation/biomass over time. Approximately four years ago, a landscape rehabilitation project planted over 500 trees within the southern half of the project limits. This planting is maturing and already contributing an increasing amount of vegetation to the corridor. These trees and associated shrubs were not planted as mitigation. Any native trees removed as part of the project will be replaced at a 3:1 ratio, resulting in continued increases to the biomass within the project limits.

City of Santa Barbara

Comment 59 Sea Level Rise

The National Academy of Science Sea Level Rise Assessment Report was released in June 2012. The report includes: relative sea level rise projections for California, Oregon and Washington, taking into account coastal erosion rates, tidal impacts, El Nino and La Nina events, storm surge and land subsistence rates; the range of uncertainty in selected sea level rise projections; a synthesis of existing information on projected sea level rise impacts to state infrastructure (roads, public facilities and beaches), natural areas, and coastal and marine ecosystems; a discussion of future research needs regarding sea level rise. The final environmental document was

updated to reflect release of the study. Refer to Section 3.2.6 (Climate Change).

City of Santa Barbara

Comment 60 Design Life of Project

While the hydraulic design normally accommodates a 50-year storm frequency, reinforced concrete structures will have a significantly longer design life duration of 75 years.



John Campanella
john@bdcdevelopment.com

07/09/2012 04:46 PM

To: "South.Coast.101.HOV@dot.ca.gov"
 "South.Coast.101.HOV@dot.ca.gov"
 cc: "Gullett, Daniel P." <DGullett@SantaBarbaraCA.gov>, "Kato, Danny" <DKato@SantaBarbaraCA.gov>
 bcc:
 Subject: FW: HOV 101 - DEIR Comments

July 9, 2012

Matt Fowler, Senior Environmental Planner
 Environmental Analysis
 California Department of Transportation
 50 Higuera Street
 San Luis Obispo, CA 93401

Dear Matt:

I am serving on the Planning Commission for the City of Santa Barbara. I attended the first review for the DEIR of the South Coast 101 Lanes Project. I was absent for the second session, but reviewed the tape of the meeting. I have several questions on the DEIR.

Comparison of Alternate F and Alternate F Modified -

1) Page 105 of the DEIR, Table 2.19 Primary Intersection Level of Service Summary —

For the Northbound off-ramp (right) at Hermosillo, the table shows an improvement in level of service from "No-Build" (C E C F) to "Cabrillo Interchange F" (B B B C). "Cabrillo Interchange F Modified", does not show a level of service on the table because it's not a primary intersection, but a secondary intersection given it would remain physically unchanged relative to their baseline conditions (as stated on page 101). Does that mean that "No-Build" level of service (C E C F) would remain under F Modified and have an unfavorable impact on Hermosillo and Coast Village Road compared to F?

The Northbound on-ramp (only) at Cabrillo under F produces a level of service unfavorable (B C B D) compared to having both Northbound on-and off-ramps under F Modified (B B B B). This appears to be due to a new dedicated right turn on-ramp lane proposed under F Modified. Couldn't this also be done for F, resulting in the same level of service?

2) Appendix H— Project Mapping, Configuration 'F' (H-37) shows off-ramp improvements ("New Roadway") and a new left turn lane for east bound Coast Village traffic to go up Hermosillo. Configuration 'F Mod' shows neither. Both F and F Modified conceptual images (Figure 2-11 and 2-12) show a number of Coast Village Road improvements. Can F and F Mod improvements on Coast Village Road be better explained and compared?

3) A traffic light would be required under F Modified, where the Northbound on-ramp and

new off-ramp meet on Cabrillo. This would be in addition to the traffic light at the intersection of the new Southbound on- and off- ramps. Alternate F would only require the latter. Would this be benefit of F, since traffic from the roundabout that is continuing on Cabrillo, would flow through better with less chance of stacking up towards the roundabout?

4) I don't believe there is conceptual exhibit of the retaining walls and landscaping needed for the new Northbound off-ramp under F Modified. Can this be provided in the final document?

RR undercrossing –

1) Can the estimated cost of raising the RR bridge at Los Patos be reduced and used to widen the Cabrillo RR undercrossing to provide a dedicated entry lane for the new Southbound on-ramp? This would serve traffic coming from the beach. Until that's done Southbound traffic from the beach will continue to stack up before the RR undercrossing along with the traffic going to the current Northbound on-ramp or to the roundabout.

2) This would also provide a safer path of travel for pedestrians.

Thank you for considering the above.

John Campanella.

Campenella - City of Santa Barbara Planning Commission

Comment 1 Traffic Circulation

Table 2.19 is now Table 2.20 in the final environmental document.

In Configuration F, the intersection of Hermosillo/Coast Village Road would be the only northbound off-ramp for this interchange. This would result in additional off-ramp volumes at this intersection and a signal was proposed to address this shift in volumes. Under Configuration F, this signalized intersection is projected to operate with a (B B B C) LOS in 2040. For Configuration F Modified, two off-ramp options would exist in the northbound direction which would provide for traffic in a manner similar to the existing configuration. In the F-Modified configuration, the Hermosillo/Coast Village Road intersection is expected to remain as two way stop control intersection, therefore, the level of service at Hermosillo is expected to operate at (C E C E), which is slightly better than the “No-Build” (C E C F) LOS at this location. These operational outputs are shown on page 7 of 13 in the “Cabrillo/Hot Springs Interchange Configuration Analysis,” dated July 19, 2011.

The level of service values are engineering terms that predict traffic delay in terms of qualitative values. They can be used to compare delay for intersections with various traffic counts and specific traffic control methods. The only conclusions that can be drawn from this data are that Configuration F Modified will have more delay (assumes equivalent existing traffic demand) with a two-way stop sign at the Hermosillo/Coast Village Road intersection compared to Configuration F, which will carry all exiting beach traffic with a proposed traffic signal.

Configuration F at the Cabrillo Boulevard northbound on-ramp intersection is uncontrolled and would remain the same as the existing condition, meaning the right-turn lane would have free access to the northbound on-ramp. This free right turn does not provide protection for pedestrians. Also, the left-turn

traffic would have to give the right-of-way to the heavy right-turn traffic. The F Modified configuration will be signalized at this location. Configuration F Modified improves traffic operations and provides pedestrians with a protected signal phase that facilitates crossing for pedestrians across traffic lanes. At the northbound ramp terminal at Cabrillo Boulevard, the Preferred F Modified Configuration is expected to operate at LOS (A A A B). See Table 2.20 in Volume I, of the final environmental document.

Campenella - City of Santa Barbara Planning Commission

Comment 2

Figure 2-11 was corrected to show the improvement at Hermosillo for Configuration F. The configuration F Interchange features only one northbound off-ramp at Hermosillo Road, which would require improvements at Hermosillo Road to accommodate significantly higher traffic volumes. The necessary traffic improvements would include lengthening the ramp deceleration, increasing the radius alignment curvature at the end, and widening the ramp shoulders. In addition, a traffic signal would be installed to maintain an adequate level of service for the intersection. A left-turn lane in the existing median of Coast Village Road would also be installed. This is because all of the northbound traffic that currently exits through the median ramp must exit instead through the Hermosillo ramp.

Configuration F Modified proposes two ramps and therefore does not route additional traffic to the Hermosillo ramp. Consequently, with the selection of the Configuration F Modified, no improvements are proposed at the intersection of Hermosillo at Coast Village Road because it would continue to have limited use since a second northbound off-ramp would be built to provide direct access to Cabrillo Boulevard.

Campenella - City of Santa Barbara Planning Commission

Comment 3

Both Interchange Configurations F and F Modified originally included dual right-turn lanes into the northbound on-ramp at Cabrillo Boulevard to prevent traffic from backing up into the roundabout and would provide for acceptable level of service at this intersection. The addition of a traffic signal at the northbound ramps for Configuration F Modified allows for northbound off-ramp traffic turning left onto Cabrillo Boulevard. The signal also has the benefit of allowing for a pedestrian signal phase. A series of technical meetings were held in the fall of 2013 involving Caltrans, City and SBCAG staff related to Cabrillo interchange operations. This involved evaluation of the 2040 conditions for Cabrillo Boulevard related to the F Modified configuration (proposed for the South Coast 101 HOV Lanes project) features at the northbound and southbound ramp junctions with Cabrillo Boulevard. The selected F Modified interchange configuration now includes refinements recommended by City staff that evolved through this coordination. One of the refinements made for interchange configuration F Modified is replacement of the dual right-turn lane approaching the northbound on-ramp from the Hot Springs/Cabrillo roundabout with a single right-turn lane.

Campenella - City of Santa Barbara Planning Commission

Comment 4

The draft environmental document included a photo-simulation and discussion of the retaining walls and landscaping related to the proposed northbound off-ramp associated with Configuration F Modified. The photo-simulation was included as part of the Observer Viewpoint 22 (OV-22) analysis in the draft environmental document and is found in Section 2.1.6 of the final environmental document.

Campenella - City of Santa Barbara Planning Commission

Comment 5

The selection of Configuration F Modified requires no replacement of the Los Patos railroad structure and has lower costs than other configurations that proposed this work (Configurations J, M and M Modified). The HOV Lanes project does not include replacement of the Cabrillo railroad structure because this improvement is not essential to providing the added mainline lane in each direction. Based on the project traffic studies, operations on Cabrillo Boulevard are expected to be better under F Modified than the no-build condition. Caltrans concurs that widening the Cabrillo Railroad bridge would help to enhance pedestrian and bicycle circulation, which is currently restricted by the railroad structure abutments. The City of Santa Barbara in coordination with SBCAG has initiated a project to assess options and costs for replacement of the Cabrillo Road Union Pacific Railroad structure. A consultant has been hired to complete this work. The Santa Barbara County Association of Governments and City staff are collaborating to identify funds for these improvements. Caltrans will coordinate with the Cabrillo Railroad Structure Replacement team during the design phase of the HOV Lanes project.

County Of Santa Barbara



Chandra L. Wallar
County Executive Officer

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Executive Office

July 5, 2012

Department of Transportation
Matt Fowler, Senior Environmental Planner
50 Higuera Street
San Luis Obispo, CA 93401

Email: South.Coast.101.HOV@dot.ca.gov

RE: South Coast 101 HOV Lanes – Draft EIR

Dear Mr. Fowler:

Thank you for the opportunity to comment on the South Coast 101 HOV Lanes Draft Environmental Impact Report/Environmental Assessment. At this time, the County submits a comment letter from the Planning and Development Department, drafted with input from the Public Works Department, as well as a letter from the Fire Department. Also attached are comments provided by members of the County Planning Commission and Montecito Planning Commission, as well as public comment letters received by the Planning and Development Department.

The County looks forward to continued dialogue on the HOV Lanes project. If you should have further questions, please do not hesitate to contact my office directly or Glenn Russell, Director, Planning and Development Department, at (805) 568-2085.

Sincerely,

Chandra L. Wallar
County Executive Officer

Cc: Renee Bahl, Assistant County Executive Officer
Glenn Russell, Director, Planning and Development Department
Scott McGolpin, Director, Public Works Department
Eric Peterson, Division Chief/Fire Marshal, Fire Department

Enclosures: Planning and Development Department letter, July 2, 2012
Fire Department letter, May 18, 2012
Planning Commission Comments, June 6, 2012
Public Comment Letters

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County of Santa Barbara
Planning and Development

Glenn S. Russell, Ph.D., Director
Dianne Black, Assistant Director

July 2, 2012

Department of Transportation
Matt Fowler, Senior Environmental Planner
50 Higuera Street
San Luis Obispo, CA 93401

RE: South Coast 101 HOV Lanes – Draft EIR

Dear Mr. Fowler:

The County of Santa Barbara Planning and Development Department has received the Draft Environmental Impact Report/Environmental Assessment for the South Coast 101 HOV Lanes Project. Thank you for the opportunity to review this environmental document and provide comments and input for your consideration. As a Responsible Agency with permitting jurisdiction over the portion of the project located within the unincorporated areas of the County, the County will be relying upon this environmental document in its permitting process.

The Planning and Development Department's comments address the general adequacy of the environmental analysis of the entire project, with specific emphasis on the portions of the project within the Summerland Community Plan, Montecito Community Plan, and Toro Canyon Community Plan areas. Consistent with Section 15096(d) of the California Environmental Quality Act (CEQA) Guidelines, the comments "focus on any shortcomings in the EIR... or on additional alternatives or mitigation measures which the EIR should include" within the context of each community plan.

General Comments

Coordination with Other Agencies. In addition to the Coastal Development Permit (CDP) identified in the list of local permits required for the project, the summary discussion (Page xi) should specify that a Final Development Plan is required by the County of Santa Barbara to accompany the CDP. The summary correctly states that an Amendment to the Local Coastal Program (LCP) is required in order to allow a modification to the 100-foot wetland buffer policy (Coastal Land Use Plan Policy 9-9). In the absence of this amendment, the project would be inconsistent with this wetland protection policy. California Coastal Commission staff has indicated that potential project impacts to coastal wetlands would be in conflict with policies of the California Coastal Act. Benefits of the project in other key priorities of the Coastal Act, such as enhanced public access to coastal resources and increased recreational opportunities, would influence consideration of a LCP Amendment and the project as a whole. On balance, the project and associated LCP Amendment must be the most protective of coastal resources.

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To that end, the EIR should provide greater detail as to the specific ways in which the project would enhance public access to coastal resources. As discussed further below, opportunities for the establishment of linkages in pedestrian and bike paths along the coast, such as connecting Santa Claus Lane with Carpinteria Avenue, Carpinteria Avenue at Highway 150 to Rincon Beach County Park, and Evans Avenue to Padaro Lane on the south side of the highway with Class I bike paths/pedestrian paths, should be discussed and included as part of the project as clear project benefits.

Santa Claus Lane Streetscape Improvements, Beach Access, and Parking. The County is currently preparing conceptual plans for streetscape improvements, beach access and parking for Santa Claus Lane. In 2011, Caltrans District 5 staff reviewed two concept alternative plans for Santa Claus Lane and provided initial feedback. The HOV lane project could potentially impact design features planned for Santa Claus Lane and coordination between the County and Caltrans will be important to ensure successful implementation of both projects. The comments below identify specific sections where potential impacts to Santa Claus Lane should be addressed. The following comments are specific to Santa Claus Lane.

1. Alternative 3 (widen to the inside) is the preferred build alternative in this location because it would not require a retaining wall on Caltrans right-of-way along the southeast end of Santa Claus Lane and it does not include median landscaping which could potentially block ocean views.
2. As part of the project or as additional mitigation, the County requests that Caltrans improve the standard U.S. 101 southbound onramp on Santa Claus Lane. This request is consistent with Toro Canyon Plan Action CIRC-TC-9.2: *The County shall work with Caltrans to investigate possible ways to calm traffic and minimize vehicle movement conflicts on Santa Claus Lane. This investigation shall include the possible relocation of the southbound Hwy. 101 onramp to a more northwesterly location, in order to avoid commercial parking areas and the access for the Sand Point Road and Casa Blanca residential developments.*

The County has documented that cars travel in excess speeds on Santa Claus Lane (posted at 25 miles per hour) in order to merge successfully on U.S. 101 southbound. County Public Works recently concluded that a proposed roundabout at the Santa Claus Lane/101 southbound onramp/Sand Point Road intersection is infeasible because vehicles would not be able to reach safe merging speeds on U.S. 101 after going through the roundabout. Consistent with Action CIRC-TC-9.2, Caltrans should evaluate alternatives for this onramp as part of the HOV lane project. The County may still be able to pursue the roundabout design option if changes were made to this onramp, such as increasing the length to meet current standards.

3. The County requests as part of the project or as additional mitigation for significant impacts to coastal resources including visual and aesthetics, the loss of Memorial Oaks, temporary construction, noise, and multimodal circulation impacts during construction, Caltrans should contribute funds towards the Santa Claus Lane Streetscape, Beach Access and Parking project. For example, the conceptual plans for Santa Claus Lane

include diagonal parking on both sides of Santa Claus Lane. This parking arrangement is contingent upon Caltrans relinquishment of a right-of-way strip between the landward side of Santa Claus Lane and U.S. 101. Support for the County's planning effort, including the right-of-way relinquishments, landscaping/screening, dedicated park and ride spaces, and a commemorative area for the Memorial Oaks would help mitigate for potentially significant HOV lane project impacts.

U.S. 101 Community Plan Policies. Page 47, 4th paragraph, 1st sentence of the DEIR, as well as the specific sections referenced below, should recognize that the Toro Canyon Plan (TCP), Montecito Community Plan (MCP), and Summerland Community Plan (SCP) envision the following opportunities to collaborate with Caltrans:

TCP:

The DEIR Section 2.1.5, Traffic and Transportation/Pedestrian and Bicycle Facilities should discuss as part of the project or as additional mitigation how Caltrans could coordinate with the County to implement the following Actions and Policy from the TCP:

1. Joint use Park and Ride/beach access parking on Santa Claus Lane (see the Toro Canyon Plan, page 81);
2. Action HA-TC-2.4: *The County shall work with Caltrans to place a sign along Highway 101 which recognizes the commemorative value of the historic memorial oak trees....;*
3. Action CIRC-TC-4.3: *The County shall coordinate with Caltrans to incorporate appropriate park-and-ride facilities (including bike lockers, transit stops and benches) near planned freeway interchange improvement projects;*
4. Policy CIRC-TC-5: *The County shall encourage Caltrans to accommodate planned bicycle facilities in the design and construction of new highway overpasses and/or work on existing overpasses.*
5. Action CIRC-TC-9.2: *The County shall work with Caltrans to investigate possible ways to calm traffic and minimize vehicle movement conflicts on Santa Claus Lane. This investigation shall include the possible relocation of the southbound Hwy. 101 onramp to a more northwesterly location, in order to avoid commercial parking areas and the access for the Sand Point Road and Casa Blanca residential developments.*

SCP:

The DEIR Section 2.1.5, Traffic and Transportation/Pedestrian and Bicycle Facilities should discuss as part of the project or as additional mitigation how Caltrans could coordinate with the County to implement the following SCP Action:

1. Action PRT-S-1.4: *The County shall consider a freeway overpass or underpass in the vicinity of Greenwell Avenue as a high priority as an alternative beach access route. If funds are available, a second freeway crossing in the center of the community would also be desired.*

The DEIR Section 2.1.6 Visual/Aesthetics should discuss as part of the project or as additional mitigation how Caltrans could coordinate with the County to implement the following SCP Policy:

1. Policy VIS-S-6: *The Evans Avenue/Lillie Avenue/Ortega Hill Road underpass and intersection shall be enhanced to create an inviting, aesthetic entrance to the Summerland community and the beach area.* | 8

MCP:

The DEIR Section 2.1.5, Traffic and Transportation/Pedestrian and Bicycle Facilities should discuss as part of the project or as additional mitigation how Caltrans could coordinate with the County to implement the following MCP Action:

1. Action CIRC-M-1.6.2: *The County shall support efforts by the City of Santa Barbara and Caltrans to signalize the intersection of Olive Mill, Coast Village Road, and the U.S. 101 ramps (within the Santa Barbara City Limits) for LOS C at build-out.* | 9

Summerland Community Plan (SCP) Update. The County of Santa Barbara is in the process of updating the 1992 SCP and design guidelines. More information about the updated plan and design guidelines can be found at the following website:

<http://longrange.sbcountyplanning.org/planareas/summerland/summerland.php>

Adoption of the updated plan and design guidelines by the Board of Supervisors is anticipated in winter 2012, with Coastal Commission certification anticipated in early 2014.

The Highway 101 HOV Lanes project would be subject to this plan when adopted. The draft updated plan does not contain any highway widening specific policies, but encourages reunification of community with the ocean and enhanced coastal and multi-modal connection. | 10

Overall Traffic Impacts. The DEIR does not adequately discuss all the project-level traffic impacts resulting from the project. The Forecast Operations Report, dated October 19, 2009, “is to provide requisite technical traffic support information for the PS&E and environmental phases of the Highway 101 HOV Widening Project” (Study Purpose, Page 1). This report concludes that the proposed project will have significant project-level traffic impacts to a total of nine intersections, and significant cumulative traffic impacts at a total of 15 intersections (Intersection Operational Results, Page 4) throughout the region from Carpinteria to Goleta. The DEIR references this study, but does not disclose these significant adverse traffic impacts or explain why the impacts were not disclosed. The DEIR, rather, concludes that there are no traffic impacts as a result of the proposed project. The conclusions of the Forecast Operations Report should be incorporated into the DEIR in order to fully inform the public and decision makers of the traffic impacts of the project. | 11

Specific Comments

1.2.2 Need

Figure 1-3, Page 11. This table should be described in the text to aid in the public’s understanding of the data provided in the graphic. | 12

1.3.1 Build Alternatives

Build Alternatives. Page 12, 1st paragraph. This discussion states that “All build alternatives would be built *mainly* within the existing public right-of-way with only slight variations between all three.” Please describe or clarify what is meant by the word “mainly” in terms of the instances when the project alternatives extend beyond the right-of-way. | 13

Cabrillo Boulevard Interchange. Page 17. This discussion describes the proposed changes to the Cabrillo interchange. However, the DEIR provides no discussion of the reasons for changes and why the changes are necessary. During the joint review of the DEIR by the County Planning Commission (CPC) and Montecito Planning Commission (MPC) on June 6, 2012, several Commissioners expressed an interest in retaining at least some of the left-hand ramps at this interchange as well as the Sheffield Drive interchange. They also questioned the need for replacing these left-hand ramps with right-hand on and off ramps. | 14

The DEIR includes a thorough analysis of alternative configurations for the Cabrillo interchange. However, as discussed at the joint CPC/MPC hearing on June 6, 2012, the DEIR contains no discussion of alternative configurations for the Sheffield Drive interchange. If no alternatives to the proposed standard diamond-shaped interchange are feasible, including potential closure of the southbound left-hand ramps and retention of the existing northbound ramps, this should be discussed in the EIR. | 15

Utility Undergrounding. Page 16, bullet 4. Specify whether existing above ground utilities would be placed underground. MCP Policy LU-M-2.3 supports undergrounding of utilities. | 16

1.3.4 Comparison of Alternatives

Table 1.2 Comparison of Alternatives with Similarities. Table 1.2, which identifies where there are similarities between the three build alternatives within the project limits, is not informative without an accompanying graphic. Additional graphics to help describe the proposed project alternatives should be included in Chapter 1 and not relegated to the technical appendices in order for the DEIR to better function as an informational document. | 17

1.4 Permits and Approvals Needed

Table 1.4 Permits and Approval Required for Proposed Project. Table 1.4 should be revised to reflect that a Final Development Plan and Local Coastal Program (LCP) Amendment will be required by the County of Santa Barbara in addition to the Coastal Development Permit. | 18

2.1.1.1 Existing and Future Land Use

Montecito. Page 37. There is a discrepancy in the acreages assigned to the unincorporated Montecito Community Plan area. In one place it refers to total land area of approximately 8,320 acres, whereas elsewhere it states that there are approximately 9,984 acres in the Mountain Subarea. Please correct. | 19

Table 2.1 Proposed Development. Table 2.1 incorrectly identifies the County of Santa Barbara as being the jurisdiction for the Milpas to Hot Springs Road Operational Improvements project and Linden Avenue to Casitas Pass Road Interchanges project. Please correct. | 20

2.1.1.2 Consistency with State, Regional and Local Plans

Highway 101 Corridor Design Guidelines. Page 42, last paragraph. *The US 101 Corridor Design Guidelines, as adopted by the Board of Supervisors in 1999, is also included in the [comprehensive] plan.* Correct the text as follows: ~~US~~ Highway 101 Corridor Design Guidelines. | 21

Additionally, the Highway 101 Corridor Design Guidelines is not a part of the Comprehensive Plan. It is a set of design criteria intended to be implemented in the Coastal Zone through Section 35-102E (HC - Highway 101 Corridor Overlay District) of the Coastal Zoning Ordinance. Consistent with the Land Use Element, South Coast Policies, Policy #6, the County encourages all agencies (including Caltrans) working within the Highway 101 Corridor to design projects to comply with the Highway 101 Corridor Design Guidelines. | 21

Highway Widening Community Plan Policies. Page 47, 4th paragraph, 1st sentence. It is incorrect that no community plan has specific policies for widening of U.S. 101. MCP Policy CIRC-M-3.8 requires community review for all widening and interchange improvements. SCP Action VIS-S-6.1 requires Caltrans, the County, and community groups to develop design criteria for underpass plans. Page 47 should mention these policies and discuss completed and proposed community review efforts. | 22

Environmental Consequences. Page 48, 3rd paragraph. This discussion mistakenly identifies the stream buffer limits as being 100 feet in urban areas and 50 feet in rural areas, when in fact it is the opposite (i.e. 50 feet in urban areas and 100 feet in rural areas). In addition, please add the Toro Canyon Plan to the list of plans that contain buffer limits. | 23

MCP Tree Protection Policies. Page 48, 4th paragraph, 2nd sentence. Add the MCP to the list of plans that include protection and preservation of trees and landscaping as scenic resources. The following MCP policies protect specimen and native trees: | 24

Policy BIO-M-1.15: *To the maximum extent feasible, specimen trees shall be preserved... Native or non-native trees that have unusual scenic or aesthetic quality, have important historic value, or are unique due to species type or location shall be preserved to the maximum extent feasible.*

Development Standard BIO-M-1.15.1: *All existing specimen trees shall be protected from damage or removal by development to the maximum extent feasible.*

Policy BIO-M-1.16: *All existing native trees regardless of size that have biological value shall be preserved to the maximum extent feasible.*

Development Standard BIO-M-1.16.1: *Where native trees of biological value may be impacted by new development... a Tree Protection Plan shall be required... A report shall be prepared by a County approved arborist/biologist which indicates measures to be taken to protect affected*

trees where standard measures are determined to be inadequate. If necessary, an appropriate replacement/replanting program may be required...

Design Guidelines References. Page 48, 5th paragraph, 2nd sentence. Correct the text as follows: Santa Barbara County Highway 101 Corridor Design Guidelines. | 25

Page 48, 6th paragraph, 1st sentence. Correct the text as follows: “The project would also potentially conflict with the City of Santa Barbara County Coastal Parkway Design Guidelines...” Page 49, 1st sentence, same correction.

Page 50, Table 2.2 Potential Policy Inconsistencies, Scenic and Visual Resources, row 1. Correct the text to: Santa Barbara County Highway 101 Corridor Design Guidelines. As noted earlier, the County recommends that Caltrans comply with the design guidelines. In addition to the listed Guideline L-3, there are more guidelines addressing scenic and visual resources including:

S16: *Sound barriers and walls should be carefully designed to minimize aesthetic impacts on freeway users as well as on surrounding areas...*

L1: *To the maximum extent feasible, all development, including expansion of U.S. Highway 101, shall incorporate provisions for landscaping to preserve the scenic and visual amenities which exist along the affected transportation corridor, or to replace such landscaping with comparable scenic and visual amenities. To the extent feasible, the historic landscaping scheme shall be preserved and restored.*

Specimen Tree Protection. Page 50 and Table 2.2. Provide a discussion of project consistency with SCP and MCP native and specimen tree protection policies (SCP Policy BIO-S-6 and MCP Policy BIO-M-1.15). The DEIR should include an exhibit showing the quantity, species, size, and location of specimen and native trees proposed for removal. | 26

Avoidance, Minimization, and/or Mitigation Measures. Page 51, 2nd paragraph. The list of local coastal policies with which the three build alternatives would potentially conflict should include biological resources, since the project’s encroachment into the 100-foot buffer of several wetlands is in violation of Coastal Land Use Plan Policy 9-9. Wetland setbacks are referenced later in the paragraph, so this appears to be a simple oversight. | 27

2.1.1.3 Coastal Zone

Avoidance, Minimization, and/or Mitigation Measures. This discussion, beginning on page 52, should be corrected to reflect that a Final Development Plan is required by the County of Santa Barbara in addition to the Coastal Development Permit. This change should be made throughout the document where applicable. | 28

2.1.1.4 Parks and Recreation

County Parks. Page 53, 3rd paragraph, and page 57, Table 2.3. Add Santa Claus Lane, an area extensively used by the public although no official beach access easement exists. Add Loon Point, an open public beach access area immediately west of Toro Canyon. Loon Point has a parking lot on the north side of Padaro Lane with trail access to the beach. | 29

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2.1.2 Growth

Growth Assumptions. Page 59, 5th paragraph. Please explain the basis for assuming a 55 percent growth in the population of Hope Ranch by 2040. Also, the reference to City of Santa Barbara/Mission Canyon should note that Mission Canyon is not part of the City; it is an unincorporated community in Santa Barbara County. | 30

2.1.3 Community Impacts

Census Year. Page 67, 3rd paragraph, 1st sentence. The demographics section references the 2000 census. The DEIR should use 2010 census information. | 31

2.1.5 Traffic and Transportation/Pedestrian and Bicycle Facilities

Intersection Safety. In addition to the proposed left exit ramps that would be reconfigured, the document should describe the safety conditions, such as those that do not meet design standards or have higher collision rates, for all on/off ramps. Safety issues and recommended improvements should be disclosed in the text of the DEIR for all ramps and intersections within the project study area. During review of the DEIR by the County and Montecito Planning Commissions, as well as during the community workshops that preceded these hearings, many local residents expressed concern regarding the substandard length of this Posilipo Lane southbound on-ramp and the hazardous condition it presents to motorists entering the highway. They have requested Caltrans to consider incorporating improvements to this facility as part of the proposed project. | 32

Sheffield Interchange. For the Sheffield Interchange and southbound auxiliary lanes, the DEIR should include conceptual plans, review at least three different alternatives, and discuss affected intersections. The alternatives should explore various ramp configurations, landscaping options, and highway widths while considering impacts to skyline trees, protected views, and noise. | 33

Existing Baseline. The Forecast Operations Report should be amended to include the auxiliary lane at Sheffield Interchange under TA-B (build), which was evaluated under TA-C (build + 4 auxiliary lanes), since a southbound auxiliary lane is part of the project. | 34

LOS Intersection Thresholds. The Caltrans LOS D intersection threshold is applicable within areas of State jurisdiction. Intersections under County jurisdiction are subject to unique thresholds in each planning area: | 35

- Summerland: LOS B; see SCP, page 69.
- Montecito: LOS standards vary by intersection; see MCP, page 66.
- Toro Canyon: LOS B; see TCP, Policy CIRC-TC-2, page 84.

Caltrans should update the DEIR text and appendices to reflect community plan LOS thresholds and analysis for intersections 26, 29, 34, 36, 38, and any others in the County jurisdiction.

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Environmental Consequences. Table 2.14 indicates that the northbound afternoon peak period hours of delay (last row of the table) would be greater under the build alternatives than the no build alternatives. Please explain the reason for this or correct if the numbers are incorrect. | 36

Traffic Redistribution. Page 99, 2nd paragraph. Except for modifications associated with the Cabrillo Interchange, no improvements associated with the project would address delay changes from traffic redistribution affecting area intersections. The DEIR should identify and analyze all delay changes and traffic redistribution, and recommend safety and circulation improvements for the entire corridor. The Olive Mill Road and Coast Village Road intersection, discussed further below, is one example of an intersection that would be adversely impacted by the proposed project and for which no mitigation is proposed. | 37

Olive Mill and Coast Village Road Intersection. Page 101. The DEIR recommends signalization of three interchanges within the City of Santa Barbara, but does not include the Olive Mill Road seven-way intersection. MCP Action CIRC-M-1.6.2 encourages a signal at the intersection of Olive Mill Road, Coast Village Road, and freeway on-ramps for LOS C at build-out. The DEIR divides the Olive Mill/Coast Village intersection into 3 intersections for the purpose of level-of-service analysis. This methodology does not appropriately portray the poor level-of-service experienced by the intersection users, which has been measured as Level of Service F using actual average vehicle delay rather than volume counting. The DEIR does show that the proposed project will decrease the level-of-service at the intersection. The DEIR should be amended to show that the proposed project will have a significant impact to this intersection and demonstrate how that impact will be mitigated. While MCP Action CIRC-M-1.6.2 calls for the signalization of that intersection, other solutions, including potentially a roundabout, may be more effective mitigation given the confusing nature of that intersection. | 38

Primary and Secondary Intersections and LOS. Page 105, Table 2.19 only identifies LOS for primary and secondary intersections that would be rebuilt. Section 2.1.5 of the DEIR should identify LOS for all affected primary and secondary intersections, and include in the text a summary chart comparing LOS for existing, project, and no-build conditions. | 39

The DEIR should state why under Table 2.19 the Sheffield Interchange LOS would degrade under all Cabrillo Interchange options compared to no-build conditions.

Safety. Page 107, 1st paragraph, states that each ramp with a higher than expected accident level will be closed or rebuilt to current standards. The DEIR should specify whether the improvements would be limited to the left exit ramps mentioned under *Collision Rates* on page 89, 3rd paragraph. | 40

Page 3 of the Forecast Operations Report indicates the on-ramps from Santa Claus Lane to Carpinteria Street southbound and between San Ysidro Road and Olive Mill Road in both directions do not meet design standards. All traffic assessments analyzed in the Forecast Operations Report should be discussed in the DEIR. The DEIR should disclose the existing and future safety conditions in both directions between Olive Mill Road and San Ysidro Road and consider mitigation measures.

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Bicycle and Pedestrian Improvements. Page 107, 3rd paragraph. The paragraph states that the HOV project would not preclude bicycle and pedestrian improvements desired by local agencies or permanently affect facilities, including the Caltrans Pacific Coast Bike Route. This is not entirely correct. Please provide additional details for each of the following planning areas:

Toro Canyon: The retaining wall included in Alternatives 1 and 2 (page 5 of 12 in Appendix H, Project Mapping) would preclude some of the concept plan design features for Santa Claus Lane, which include securing right-of-way easements from Caltrans on the landward side of Santa Claus Lane to provide the space required for proposed sidewalks and parking improvements. Thus, the County cannot finalize design plans for this segment of Santa Claus Lane until it is known whether the preferred HOV project includes the retaining walls along Santa Claus Lane.

Summerland and Montecito: The SCP contains specific Park, Recreation, Trail (PRT) corridors that under Action PRT-S-2.3 “shall be kept clear from encroachment by new uses or development, to the extent reasonably feasible.” Additionally, under the Santa Barbara County Coastal Zoning Ordinance (Article II), Section 35-191 (Summerland) and Section 35-215 (Montecito), the project is subject to the SCP and MCP Overlay findings that “development will not adversely impact recreational facilities and uses.”

The DEIR should discuss how the project would affect the following Montecito and Summerland PRT corridors:

- *Via Real:* Alternative 2 retaining walls on the northbound side would affect the ability to expand the bike path along the south side of Via Real and Lillie Avenue.
- *Evans Avenue and Padaro Lane:* Bridge widening would affect existing and future multi-modal circulation during and after construction.
- *Wallace Avenue Bike Path:* SCP Action CIRC-S-12.3 envisions a Class I bike path along the south side of U.S. 101. Evaluate whether the project would affect the ability to develop a Class I bike path along this corridor.
- *North and South Jameson Lane:* Consider the impacts of proposed soundwalls on existing facilities and future expansion of adopted bikeways. Identify mitigation measures that could address potential impacts.

The 101 Operational Improvements project included provision for walking and biking through the Cabrillo Boulevard Interchange with Caltrans standard accommodations in the form of sidewalks, class I and II bike lanes. Since that time, the project team has failed to gain Union Pacific’s permission to implement these proposed accommodations under its right of way via a new tunnel. Union Pacific has suggested a different accommodation that requires replacement of the Union Pacific Railroad bridge with a wider road section under it. These bike and pedestrian accommodations were included as a part of the City’s Coastal Development Permit to widen Highway 101 in the vicinity. The DEIR does not indicate that this bike/pedestrian improvement is no longer proposed. The DEIR simply concludes on page 102 that the project will maintain the continuity of existing and future bike and/or pedestrian paths as a part of all interchange configurations. This is not true. The DEIR does not describe how the class I bike path or sidewalk will be impacted by the removal of the center traffic signal. The DEIR does not describe how bikes and pedestrians are to transition

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under the Union Pacific Railroad Bridge where there are no accommodations for pedestrians. We concur with the City of Santa Barbara staff that this must be described and addressed appropriately, both as a change to the environment and based on the project’s consistency with the City of Santa Barbara Local Coastal Plan, which requires improvement of pedestrian and bicycle access with the widening of Highway 101. We believe that replacement of the Union Pacific Bridge will be necessary to provide a safe and appropriate bicycle and pedestrian facility, and would enhance circulation with the two Cabrillo southbound diamond intersection configurations by providing additional space for a dedicated right turn lane for the southbound on ramp.

Bicycle and Pedestrian Routes. Page 107. This discussion references the desire by local agencies to improve bicycle and pedestrian circulation within the project limits. The County of Santa Barbara echoes the City of Carpinteria’s interest in establishing a Class I bike path/pedestrian trail to connect Santa Claus Lane to Carpinteria Avenue and a Class I bike path/pedestrian trail to connect Carpinteria Avenue at Highway 150 to Rincon Beach County Park. An additional Class I bike path along the south side of the highway connecting Evans Avenue (Lookout Park) with Padaro Lane is envisioned in the Summerland Community Plan (Action CIRC-S-12.3). County staff encourages Caltrans to consider incorporating these improvements into the analysis of project alternatives. California Coastal Commission staff has indicated that enhancing public access to coastal resources must be demonstrated in order to balance against the impacts of the project on coastal resources including wetlands. To this end, the EIR should provide greater detail as to the specific ways in which the project would enhance public access to coastal resources in a regionally important manner, particularly with regard to alternative transportation modes that also serve the goal of decreasing greenhouse gas emissions and play a critical role in reducing traffic congestion through the project corridor. These projects would help to close gaps in bicycle and pedestrian facilities and connect coastal areas.

2.1.6 Visual/Aesthetics

County Comprehensive Plan Visual Impacts. Analysis of observer viewpoints should consider significant visual resources, as noted in the Comprehensive Plan Open Space Element and the County’s *Environmental Thresholds and Guidelines Manual*, which have aesthetic value and include:

- Scenic highway corridors.
- Parks and recreational areas.
- Views of coastal bluffs, streams, lakes, estuaries, rivers, water sheds, mountains, and cultural resource sites.
- Scenic areas.

Evans Avenue Undercrossing. The following SCP policy and action should be taken into account when considering design and mitigation measures for expansion of the underpass at Evans Avenue:

Policy VIS-S-6: *The Evans Avenue/Lillie Avenue/Ortega Hill Road underpass and intersection shall be enhanced to create an inviting, aesthetic entrance to the Summerland community and the beach area.*

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Action VIS-S-6.1: *The County, Caltrans and SCA shall work together to develop design criteria which should be used in the underpass plans.*

The DEIR should discuss construction and operational visual impacts from bridge expansion at Evans Avenue and include a site plan and elevations.

SCP View Corridors. The SCP (page 137) identifies and protects the following views and visual resources that could be affected by the project:

- Padaro Lane area view corridor of the foothills, ocean, and Loon Point.
- Summerland from U.S.101.
- Eucalyptus groves at Padaro Lane.
- Lillie Avenue and the "Downtown" of Summerland.
- Jostens Hill.

Maintaining these views and character is required under the following SCP policies:

Policy VIS-S-3: *Public views from Summerland to the ocean and from the Highway to the foothills shall be protected and enhanced. Where practical, private views shall also be protected.*

Policy VIS-S-4: *New development in Summerland shall be compatible with and shall enhance the community's architectural character.*

Further information and analysis is needed to determine if the soundwalls, Sheffield Interchange and auxiliary lane, tree removal, Padaro Lane and Evans Avenue Bridge widening, Alternative 2 retaining walls/landscaping, and clear panels would be consistent with SCP policies protecting views and visual character (Policy VIS-S-3, VIS-S-4, and VIS-S-7).

MCP View Corridors. The MCP (see page 123) identifies scenic primary corridors, including "U.S. Highway 101 which has views to the south of curving beaches with rocky headlands and to the north of chaparral covered mountains." The following MCP policy protects views from public roads:

Policy VIS-M-1.3: *Development of property should minimize impacts to open space views as seen from public roads and viewpoints.*

The Montecito Landscape Unit analysis should consider impacts on views from scenic primary corridors and public roads

Toro Canyon Reference. Page 109, 3rd paragraph. Add Toro Canyon to the list of unincorporated communities.

Santa Claus Lane. Page 110, 2nd paragraph. Add the commercial development along Santa Claus Lane and the highway commercial projects at the eastern Padaro Lane/101 interchange, both of which are visible from U.S. 101.

Page 111, 2nd paragraph. Add the view to Santa Claus Lane Beach and the views of the Santa Claus Lane business district from U.S. 101 as an important visual element in the Carpinteria Salt Marsh Unit.

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View Corridor Overlay District. Page 110. The View Corridor Overlay District (Article II, Sec. 35-96), which protects coastal view corridors from U.S. 101, is missing from the discussion under the Carpinteria Salt Marsh, Padaro, Summerland, and Montecito Units. Three View Corridor overlays extend along the coast south of U.S. 101:

- From Via Real on the north to the Pacific Ocean to the south, from just south of Padaro Lane for approximately 2,250 feet to the end of Santa Claus Lane.
- South of U.S. 101, beginning at Padaro Lane Interchange and spanning west approximately 3500 feet.
- South of U.S.101, beginning at the industrial QAD parcel terminating at Fernald Point in Montecito, spanning approximately 4500 feet.

Community Plan References. Page 111, Padaro Unit. Correct text as follows: "This unit includes the unincorporated Toro Canyon area between the City of Carpinteria and the unincorporated community of Summerland."

Memorial Oaks. Page 115. The DEIR references the recommendations developed by the Memorial Oaks Focus Review Group to achieve the goal of minimizing project impacts to the memorial Oaks and reviving their commemorative significance. These recommendations should be specifically identified in the EIR and not merely referenced in order to better inform the public and decision makers.

Additional Observer Viewpoints. Page 115. Page 109 acknowledges that local policies protect visual resources. The DEIR should include the following observer viewpoints based on community plan policies:

Summerland Landscape Assessment Unit:

- Padaro Lane overpass in both directions (Policy VIS-S-3 and VIS-S-7).
- Summerland (between #11 and #12) towards the underpass at Evans Avenue (Policy VIS-S-4, VIS-S-6, and Action VIS-S-6.1).
- U.S. 101 towards Summerland from #11 and #12 (Policy VIS-S-3 and VIS-S-4).
- Crest of Ortega Hill from both directions; include the proposed auxiliary lane in the analysis (Policy VIS-M-1.3 and VIS-S-3).
- #10, #11, and #12 with clear panel soundwalls (Policy VIS-S-3 and VIS-S-4).

Montecito Landscape Assessment Unit:

- Public beach at Fernald Point towards the proposed retaining walls on the bluff (Policy VIS-M-1.3).

Carpinteria Salt Marsh and Padaro Landscape Unit:

- The view to Santa Claus Lane beach from southbound U.S. 101 (Development Standard VIS-TC-1.1).

Carpinteria Salt Marsh Unit. Page 129. This unit includes important views of Santa Claus Lane beach, particularly from U.S. 101 southbound near the Santa Claus Lane exit. The assessment should include the existing condition and proposed conditions from Alternative 1, 2, and 3 for the views of Santa Claus Lane beach. It should also be noted that Caltrans has a large

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storage yard in the right-of-way between U.S. 101 and Santa Claus Lane. The storage yard, which can block views of the ocean, should be assessed as part of the existing visual setting. An additional observer viewpoint should be positioned between #4 and #5 near the Santa Claus Lane exit to specifically access visual impacts. The analysis needs to clarify if Alternative 1 and 2, which include new median planting, would block views of Santa Claus Lane beach from U.S. 101 or the ocean.

53

Padaro Lane Views. Page 138, Observer Viewpoint 5A, from U.S. 101 west of South Padaro Lane looking southbound. There is no discussion of the visual impact of the soundwall as viewed from Padaro Lane, which is often used by bicyclists traveling between Summerland and Carpinteria.

Soundwall Plantings. Page 139. Alternatives 1 and 3 do not describe how the planting along the soundwall will occur.

54

Padaro Lane Impacts. Page 142, Summary – Padaro Landscape Assessment Unit. Although the proposed soundwall would not block views of the ocean, salt marsh or Santa Ynez Mountains, what are the visual impacts on the Padaro Lane side of the soundwall? Would any planting occur on the Padaro Lane side to minimize the urbanizing effect of the wall?

Santa Claus Lane Construction Impacts. Page 210. This section needs to specifically detail what the visual impacts will be at the Caltrans maintenance/storage yard along Santa Claus Lane. Currently, the storage of construction materials and debris at this yard can overwhelm the visual character of this important recreational asset, as well as impact the business community and nearby residential areas. At times the pile of debris towers over the fence and minimal landscaping that currently exists on the site, obstructing views of the ocean from the highway. To reduce the visual impacts during construction, the stockpiles should be lowered and screened from view with appropriate landscaping and fencing. Caltrans should consult with the County on an appropriate plant palette and planting locations to help ensure compatibility with the conceptual plan for the area. Once construction is completed, the County strongly recommends permanent removal of any remaining stockpiles in order to help mitigate effects on visual resources, provide for the long-term protection of views of the coast from the highway, and preserve the visual character of this important recreational area.

55

Avoidance, Minimization, and/or Mitigation Measures. Page 211. The mitigation measures identified to reduce the project's visual impacts lack sufficient detail with which to evaluate their efficacy in reducing impacts and to understand what the project would look like with their incorporation. Greater detail and specificity should be provided where possible. Visual graphics to aid in depicting the mitigation measures applied to the project may be helpful and should be considered. Caltrans is encouraged to make every effort to soften the visual impacts of any soundwalls constructed, including techniques such as varying the finish of the walls, modifying their placement to avoid a single unified wall, and through the use of landscaping and/or public art. As with the Milpas Street and Cacique Street undercrossings in the City of Santa Barbara, Caltrans may wish to consider aesthetic upgrades at the Evans Avenue and Sheffield Drive interchanges as mitigation of visual impacts of the project. Features could include scored, stamped and/or colored concrete forms, public art, decorative lighting and landscaping. These

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design details will be worked out during the permit review process, including review of the project by the South County and Montecito Boards of Architectural Review as well as through working with the locally appointed Design Review Team.

56

Mitigation measures should also be identified to reduce construction-related impacts given the extended length of the proposed construction. In addition, the County strongly recommends Caltrans to consider, as a mitigation measure to help reduce the visual impacts of the project, the removal of the stockpiles along Santa Claus Lane. This area is located within a View Corridor Overlay identified in the County's Coastal Land Use Plan and is intended to protect unobstructed views of the coast from the highway.

2.1.7 Cultural Resources

Archeological Site Report. To complete our review of archeological impacts and mitigations, the County needs additional information on the Via Real redeposited midden site (CA-SBA-3943). Specifically, we would like a copy of the Archeological Site Report for CA-SBA-3943. With the understanding that this report is confidential, please contact Joyce Gerber, County Archeologist, at jgerber@co.santa-barbara.ca.us or (805) 934-6265 to arrange for us to receive a copy of the report.

57

Memorial Oaks. Page 214. The TCP (Table 13) identifies U.S. 101 between Nidever Road and Toro Canyon Road "Eligible as a County Place of Historic Merit" based on the oak trees planted in memory of soldiers who died in World War I, known as the Memorial Oaks. The DEIR discusses the Memorial Oaks in the Visual and Aesthetic section, stating they are not eligible as a historical resource. The Cultural Resource section should also include a short discussion of the historic significance of the Memorial Oaks in relationship to the TCP designation of this resource as potentially a place of historic merit.

58

Local Historical Significance. The DEIR suggests that potential historic resources were evaluated for significance at the local level, not just the national level. However, this is not always clear or explicit. For example, page 221, 2nd bullet, states that 108 Pierpont Avenue "was determined eligible, at the local level of significance." Conversely, page 224, last paragraph, indicates that historical properties considered in the impact analysis include only resources listed or eligible for the National Register of Historic Places (NHRP) or resources considered historic for the purposes CEQA; a discussion of local significance is omitted. The DEIR needs to clarify whether any structures important at the local level (i.e., eligible as County Landmarks or Places of Historic Merit) would be affected.

59

Area of Potential Effects Buffer. Page 216, 1st paragraph. The DEIR states that a buffer around the outer limits of anticipated ground-disturbing activities is included within the archaeological Area of Potential Effects to accommodate construction and minor design changes. The 2008 Historic Property Survey Report (Kirkish, 2008) states that the buffer is 10–120 feet. However, the buffer extent and location should be made clear in the DEIR.

60

Historic Properties in the Architectural Area of Potential Effects. A summary description of the potential historic resources within the project area is provided beginning on page 218. An

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exhibit depicting the location of these historic properties on a map would help to better understand their relationship to the project. Such an exhibit should be included in the body of the EIR and not relegated to a technical appendix. | 61

County Comprehensive Plan and Cultural Resources. Page 225, 1st paragraph. The DEIR states that all three alternatives would result in impacts to CA-SBA-3943. The County Comprehensive Plan Land Use Element Historical and Archaeological Sites Policy 1 and Coastal Land Use Plan Policy 10-1 specify that “all available measures... shall be explored to avoid development on significant historic, prehistoric, archaeological and other classes of cultural sites.” The DEIR should discuss why CA-SBA-3943 cannot be avoided. | 62

Data Recovery Plan. Page 226, 2nd bullet. The Data Recovery Plan should include a research design that would inform data recovery—what will be collected, how it will be collected, and what will be analyzed. The plan should follow to the Santa Barbara County Cultural Resources Guidelines for preparation of a Phase 3 Data Recovery Plan. For projects in the County, the Chumash tribes should have an opportunity to participate in crafting the Data Recovery Plan. | 63

2.2.1 Hydrology and Floodplain

Toro Canyon Drainage and Project Details. The TCP area experiences local drainage problems in the vicinity of the HOV lane project, particularly along the southeastern end of Padaro Lane where runoff exceeds the capacity of local drainage channels and along the southeast end of Santa Claus Lane in the business area. The HOV lane project proposes to add 52 acres of new impervious surface to the project area overall. There is not enough detail in this section to determine what is proposed to ensure that existing drainage problems are not exacerbated. The document states that the project will be designed to meet the post construction runoff requirements in the Construction General Permit, or the new Caltrans NPDES Permit if applicable. These requirements should be specified. Will post-development runoff volumes exceed pre-development volumes? | 64

Bluff Development. The DEIR should address SCP bluff drainage requirements for the Sheffield Interchange and auxiliary lane (Policy GEO-S-3, Action GEO-S-3.2, and Action GEO-S-3.3). | 65

Arroyo Paredon Creek. Page 232, 2nd paragraph. The project would replace the bridge and proposes a soundwall on the south side of U.S. 101 within the floodplain of Arroyo Paredon Creek. The DEIR states that the new bridge would have more capacity than the existing one and the proposed soundwall would be designed to pass flood flows. Please clarify the existing capacity of the bridge and the proposed capacity with the project. Specify the design features to be included to ensure the soundwall would pass flood flows. | 66

Soundwalls and Montecito Creek. Page 232, 4th paragraph. Quantify how much of the 100-year flow escapes the main channel and describe design features that would pass flood flows for each bridge. | 67

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Drainage Design. Page 233. This paragraph only describes the portions of the project that were dropped from consideration due to significant impacts. This paragraph should also include the measures that are included in project design to minimize and/or mitigate impacts. | 68

Arroyo Paredon Creek and Flooding. Page 242, Arroyo Paredon Creek. This section should also note that where the creek passes under U.S. 101 and discharges to the ocean is also subject to flooding. | 69

2.2.3 Geology/Soils/Seismic/Topography

Retaining Walls. The DEIR should provide a site plan and elevations for the two proposed retaining walls along the bluff at the Sheffield Interchange. | 70

Special Problems Area (SPA). Approximately 3,500 linear feet of the project bisects the Summerland SPA. This portion requires a geology/soils report and review by the County Special Problems Committee. The Committee must find that the project would not impact existing drainage (Policy FLD-S-2 and Action GEO-S-2.2). This will occur during the County permit process for the project. | 71

Coastal Bluff. SCP policies regulate bluff top development through setbacks, drainage requirements, and design (Policy GEO-S-3, Action GEO-S-3.1, Action GEO-S-3.2, and Action GEO-S-3.3). The DEIR and geologic reports should analyze whether the Sheffield Interchange improvements would affect bluff retreat rates. Under Section 2.5, Cumulative Impacts, the DEIR should discuss how sea level rise would affect bluff retreat. | 72

2.2.5 Hazardous Waste or Materials

Contaminated Soil. Pages 267 and 283. The DEIR should address the reuse of aerially deposited lead contaminated soil. For example, it should specify whether the soil would be reused, and if so, where it would be reused. Alternatively, if the soil is diverted, the DEIR should clarify where and how it would be disposed of. SCP Policy RISK-S-1 requires that “safety measures shall be provided to minimize the potential for risk of upset and public safety impacts... Sensitive uses should be accounted for and impacts should be mitigated to the maximum extent feasible.” | 73

Oil Wells. Page 265, 2nd paragraph. The Site Investigation Report did not discover any abandoned oil wells. Numerous known and unknown abandoned oil wells exist along the coast in Summerland near the project. The mitigation measures should include the following SCP requirement: | 74

Policy HAZ-S-1: If any abandoned oil wells are discovered, State Department of Conservation, Division of Oil and Gas abandonment removal procedures shall be followed.

In addition, the mitigation section should reference the safety and abandonment procedures on page 11 of the Site Investigation Report to address unknown oil wells that are discovered during construction.

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Site #27. Page 265, 3 rd paragraph. Site #27 refers to the former Iron Horse gasoline service station, but does not correlate to Table 2.4 or Figure 2-18. The DEIR needs to reference the separate project under which tank removal would occur.	75	
Asbestos Mitigation. Page 266, 3 rd paragraph. For removal of asbestos from the Padaro Lane overpass and Evans underpass, the mitigation section should reference the Asbestos and Lead-containing Paint Survey abatement recommendations.	76	
2.2.6 Air Quality		
Page 277, 2nd paragraph. The last sentence in this paragraph should be corrected to include the Sheffield Drive interchange among the intersections to be reconfigured as part of the project.	77	
Avoidance, Minimization, and/or Mitigation Measures. Pages 282 through 286. Among the mitigation measures identified to reduce construction-related and operational air quality impacts, the County also recommends that Caltrans consider mitigation measures that would enhance opportunities for alternative modes of transportation within the project corridor. Such improvements could reduce the reliance on vehicle use, thereby helping to reduce greenhouse gas emissions and other pollutants generated by fossil fuel consumption. As discussed earlier in our comments, two specific opportunities for bike/pedestrian path improvements in the Carpinteria area could help to offset air emissions generated by the extensive construction activities as well as the increases in operational emissions.	78	
2.2.7 Noise		
Short-term Construction Impacts. The DEIR should analyze noise construction impacts and duration. Generally, in the county, a construction site located within 1,600 feet of any noise-sensitive use of would generate a potentially significant short-term noise impact requiring mitigation (<i>Environmental Thresholds and Guidelines Manual, Noise Thresholds</i>). Possible measures to mitigate this impact include limiting construction within 1,600 feet of sensitive receptors to weekdays between the hours of 8 AM to 5 PM; noise attenuation barriers and muffling of grading equipment may also be required. The DEIR should include more specific construction hours in its selection of mitigation measures.	79	
Regulatory Setting. Page 287. The discussion of the California Environmental Quality Act states that if a proposed project would have a significant noise impact, then CEQA dictates that mitigation measures must be incorporated into the project unless such measures are infeasible. What is missing from this statement is the fact that if there are no feasible mitigation measures to reduce significant noise impacts of the project, then the impacts are considered significant and unavoidable. This is relevant given Caltrans' approach to mitigating noise impacts with soundwalls and the potential for several identified soundwalls to not be incorporated into the project if the majority of affected residents vote against them or they are found to be infeasible for other reasons.	80	
Santa Claus Lane Uses. Page 290, Franklin Creek to South Padaro Lane. This paragraph should also mention the commercial/business area on Santa Claus Lane. This area includes an outdoor		
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facility used for weddings and special events and two restaurants with outdoor seating, one of which can be seen from U.S. 101. Would these be subject to the outdoor use threshold?		81
Page 292. The outdoor restaurants and facilities on Santa Claus Lane should be included as a receptor site in the study.		
Summerland Uses. Page 291, 3 rd paragraph. Mixed-use is incorporated into most of the existing and proposed commercial development along Lillie Avenue. The DEIR should address how second story residential units would be affected by noise.		82
The Summerland Church (Activity Category B/E) is missing from the description and analysis and should be considered a sensitive receptor site. A new public meeting room (Activity Category B/E) associated with a fire station is proposed on the corner of Lillie Avenue and Temple Street, and may need to be considered as a sensitive receptor at the time of permit processing.		
SCP Noise Policy. SCP Policy N-S-1 requires that “interior noise-sensitive uses... shall be protected to minimize significant noise impacts” and includes special considerations for the design as it relates to indoor and outdoor noise levels. The DEIR should consider mitigations, such as noise reducing retrofits, at sensitive locations to abate indoor noise levels over 45 decibels consistent with the SCP and the Noise Element.		83
2.3.1 Natural Communities		
Wildlife Corridors. Page 350, first paragraph. The paragraph mentions wildlife corridors but there is no further discussion about them. The DEIR should determine if the creeks under U.S. 101 serve as wildlife corridors and discuss any potential impacts, consistent with TCP Development Standard BIO-TC-1.1, SCP Action BIO-S-1.4 and MCP Development Standard BIO-M-1.14.1, which protect wildlife corridors.		84
Avoidance, Minimization, and/or Mitigation Measures - Riparian (page 353), Coast Live Oaks (page 354). The replacement ratio for native trees removed is identified as 3:1, with a note that higher replacement ratios are sometimes appropriate, but that project-specific circumstances warrant this level of replacement. In either this discussion or the discussion of biological resources in section 3.2.2, or both, it should be noted that mitigation with higher replacement ratios may be requested or required by the County and/or the Coastal Commission in order to achieve greater protection for coastal resources and achieve consistency with applicable County policies.		85
Raptor Nests. Page 354, 3 rd bullet. The DEIR and appendices should describe raptor nest survey methods. No raptor nests were observed in the biological study area on January 26 and February 2, 2010, which are outside of the nesting season. (According to the mitigation section, the nesting season is between February 15 and September 1). Both the SCP and MCP require preservation to the maximum extent feasible of trees serving as raptor nesting and roosting sites (SCP Policy BIO-S-6 and MCP Policy BIO-M-1.18).		86

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2.3.4 Threatened and Endangered Species

Monarch Butterfly Habitat. Page 389, 3rd bullet. The DEIR only lists two butterfly overwintering sites near the project limits.

The Toro Canyon, Summerland, and Montecito Planning areas contain eight total mapped butterfly ESH near the project. SCP Action BIO-S-3.2 and MCP Development Standard BIO-M-1.4.2 require a roost protection plan for development within 200 feet of known or historic butterfly roosts. Four of these ESH sites are located within approximately 200 feet of the project:

- Summerland: North of the intersection of Padaro Lane and Via Real.
- Montecito: Northeast of the intersection of La Vuelta and North Jameson.
- Toro Canyon: Two along Padaro Lane.

This section should assess potential impacts to this habitat per TCP Development Standard BIO-TC-1.4 (Coastal), SCP Action BIO-S-3.2, and MCP Development Standard BIO-M-1.4.2, which require a minimum buffer of 50 feet from any side of the roost. The DEIR and appendices should describe of all eight mapped butterfly Environmentally Sensitive Habitat (ESH) and assess impacts to the four mapped sites located within 200 feet of the project.

2.3.2 Wetlands and Other Waters

Regulatory Setting. In the third complete paragraph on Page 355, the discussion of wetlands at the state level should include reference to the fact that the Department of Fish and Game and California Coastal Commission, as well as local agencies, rely on single parameters in determining the presence or absence of wetlands versus the three-parameter test used at the federal level.

Affected Environment. Page 356. The second paragraph under this section references a map depicting the locations of the various wetlands within the project site being included in the Natural Environment Study. The location of this study (i.e. where it can be reviewed) should be provided. Moreover, the referenced map (as well as other key biological resource maps) should be incorporated into the body of the Draft EIR to aid in the public's review of this document, rather than relegated to a study that is not easily accessible. To this end, Figures 2-31 through 2-38 should be enhanced to provide this information.

Avoidance, Minimization, and/or Mitigation Measures – Wetlands. Page 383. Compensatory mitigation for the loss of wetlands is presented as a range from 1:1 to 3:1. The project as proposed would be inconsistent with wetland protection policies of the County's Coastal Land Use Plan, thus necessitating a LCP Amendment. Since the LCP Amendment directly involves wetland resources, it should be assumed that not less than the 3:1 replacement ratio would be acceptable to the California Coastal Commission. In either this discussion or the discussion of biological resources in Section 3.2.2, or both, it should be noted that compensatory mitigation for wetlands above these ratios could be requested or required by the California Coastal Commission in order to achieve, "on balance," greater protection for coastal resources in association of the necessary LCP Amendments for this project.

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2.4 Construction Impacts

Visual Construction Impacts. Page 397. This section of the DEIR omits any mention of visual or aesthetic impacts during construction. As noted earlier, the visual impact of the Caltrans storage yard along Santa Claus Lane during construction needs to be evaluated.

Bicycling Construction Impacts. Page 400, Environmental Consequences, Traffic and Transportation/Pedestrian and Bicycle Facilities. The extensive construction schedule has the potential of shifting traffic off U.S. 101 on to local roads. The frontage roads along U.S. 101 are the only coast route for bicyclists from Santa Barbara to Carpinteria. This section should discuss the impacts to bicyclists from increased vehicle traffic on Jameson Lane, Lillie Avenue, Via Real and Padaro Lane during construction.

Caltrans should work closely with County Public Works regarding the construction traffic management plan for neighborhood streets surrounding the Sheffield Drive interchange. Upon completion of construction, Caltrans should repair and repave the surrounding local streets to mitigate for construction impacts caused by large trucks, heavy equipment, and detours.

2.5 Cumulative Impacts

Impacts. Analysis of cumulative impacts should be provided for all issue areas with significant impacts, in addition to visual resources.

Visual/Aesthetics Cumulative Impact Analysis. Page 419, 2nd paragraph. Add Santa Claus Lane as a location outside of the Caltrans right-of-way that can be seen from frontage roads.

Table 2.43 Potential Cumulative Project List. The Santa Claus Lane Streetscape, Beach Access and Parking project should be added to the list of cumulative projects in Table 2.43.

3.2 Discussion of Significant Impacts

Noise. Page 431. In the discussion of noise impacts, only one significance threshold is identified for determination of potential noise impacts under CEQA, "a significant impact occurs when the design year noise levels (20 years after construction of the project) increase by 12 or more decibels over existing noise levels." However, the Initial Study Checklist in Appendix G of the CEQA Guidelines includes the following consideration:

Would the project result in:

- a) *Exposure of persons to the generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

Thus, under CEQA, it is important to evaluate whether the project would expose persons to noise levels in excess of adopted local standards. This discussion should be augmented with reference to the County of Santa Barbara Noise Element as well as the County of Santa Barbara's *Environmental Thresholds and Guidelines Manual*, which indicate that projects that expose

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persons to exterior noise levels in excess of 65 dBA may have a significant impact on the environment. Specifically, the County's noise threshold states: "A project will generally have a significant effect on the environment if it will increase substantially the ambient noise levels for noise-sensitive receptors in adjoining areas. Per item a., this may generally be presumed when ambient noise levels affecting sensitive receptors are increased to 65 db(A) CNEL or more."

Where noise levels would exceed 65 dBA and soundwalls are not installed because of Caltrans' determination of infeasibility, noise impacts may remain significant and unavoidable (Class I). The analysis in this section of the document needs to be revised to address this issue.

To provide for the long-term reduction of noise impacts resulting from the project, Caltrans should commit to using state of the art sound attenuating pavement during the initial construction of the project and during future pavement maintenance throughout the project corridor.

In addition, please clarify what authority the County has over the approval of soundwalls in the event the affected residents vote to have a soundwall constructed or vice versa.

3.2.2 Significant Effects of the Proposed Project

Cultural Resources. Page 431. The DEIR indicates that a draft memorandum of agreement, which would stipulate mitigation measures that must be carried out as part of the current project, will be available for review and comment when the DEIR is in public circulation. Please provide the County with a copy of the draft memorandum so that our archeologist can evaluate how cultural resource impacts will be addressed.

The Summerland WW I Monument is Santa Barbara County Historic Landmark #35 and adjacent to the northbound Lillie Avenue exit. Although the monument is no longer eligible for the National Register of Historic Places due to its relocation, it has been "identified as a historic resource for the purposes of the California Environmental Quality Act" and warrants measures to protect it. In particular, the concrete monument itself is cracked and susceptible to further damage. Noise impacts warrant the construction of a soundwall adjacent to the masonry structure but it is unclear whether this section of soundwall will be erected. The DEIR identifies adjacent sections of soundwall to have severe visual impacts and notes that if they are not built the remaining portion of wall "will not be financially reasonable."

Because it is immediately adjacent to the Lillie Avenue off-ramp, vibration or any other disturbance from the construction project potentially poses a serious threat to the structural integrity of the Landmark. This should be identified as a potentially significant impact and mitigation measures should be identified to reduce the impact to less than significant levels. This could include measures to protect the Landmark, such as structural reinforcement and conservation of the monument itself, and possibly relocation of the monument to a suitable public site further from the project limits.

Biological Resources. Page 432. This discussion should identify the mitigation measures that would be implemented to reduce impacts to biological resources to less than significant levels. This discussion should also note that the project is currently inconsistent with County wetland

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protection policies. As such, a LCP Amendment will be required. Compensatory mitigation for wetlands alone may not be sufficient to resolve the policy conflict at the Coastal Act level, and other benefits of the project may need to be demonstrated in order to achieve, "on balance," greater protection for coastal resources in association with the California Coastal Commission's consideration of the LCP Amendment for this project.

3.2.3 Unavoidable Significant Environmental Effects

See the comments above related to the evaluation of noise impacts under CEQA and the potential for significant and unavoidable noise impacts in the event soundwalls required for noise attenuation are not constructed as part of the project.

3.2.4 Climate Change under the California Environmental Quality Act

California Environmental Quality Act Conclusion. Page 445. The impact analysis concludes that it is too speculative to make a determination as to the significance of the project's impacts on climate change and greenhouse gas emissions, but notes that Caltrans is committed to implementing measures to help reduce the potential effects of the project. On the following pages, Caltrans discusses various strategies that would be pursued in furtherance of this commitment. The County strongly encourages Caltrans to consider opportunities for improving non-vehicular modes of transportation throughout the project corridor as a means of offsetting the increases in greenhouse gas emissions resulting from the project. This letter has identified at least two specific areas where a bike/pedestrian path could be established to improve non-vehicular transportation along the coast, including connecting Santa Claus Lane with Carpinteria Avenue and Carpinteria Avenue at Highway 150 to Rincon Beach County Park with Class I bike paths/pedestrian paths.

Thank you again for the opportunity to comment on this environmental document. We look forward to continuing to work with you and the other affected jurisdictions on this important project to address regional traffic congestion through the South Coast area of Santa Barbara County.

Sincerely,



Glenn Russell, PhD.
Director, Planning & Development

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Joint County Planning Commission/Montecito Planning Commission

Briefing on Draft EIR/EA for Caltrans South Coast HOV Lanes Project

June 6, 2012

Commissioner Comments

Commissioner Brooks

- Anything that can be done to mitigate the visual impacts of the soundwalls and medians should be considered, including landscaping at a minimum
- Have the traffic numbers and studies used in the analysis changed?
- Mitigation should include litter cleanup and ongoing maintenance associated with the soundwalls and medians in order to reduce long-term visual impacts

Commissioner Brown

- Concerned about the increase in pavement occurring along the corridor, bringing a sense of Los Angeles to Santa Barbara
- Hopes that Caltrans will consider the local context of Santa Barbara in designing the project
- It is mostly local drivers who use the left-hand on and off-ramps at Cabrillo/Hot Springs Road and Sheffield Drive and not visitors to the area, so there is not the concern of having an interchange that does not meet driver expectations if these left hand ramps are maintained
- The project should be targeting local drivers and not visitors to the area
- All of these comments are about the extent of the visual impact to the community
- Caltrans should make every effort to deviate from the standards to accommodate the local context

Commissioner Valencia

- Would like to see the Sheffield Drive interchange protected
- The project needs good landscaping and relief for the soundwalls, but it is too early to evaluate that now

Commissioner Cooney

- Concerns have to do with the project and not the environmental review
- Questions the need to close or replace the left off ramps
- Statewide standards are being applied to this project and he is concerned that this corridor will look like Highway 210 after the project is completed
- The view over Ortega Ridge is special and needs to be considered
- The EIR is not the problem, it is with the project itself
- The Montecito Association has identified inadequacies in the EIR, so there is room for revisions and improvements to the document, with the changes potentially sufficient to require recirculation

- Caltrans' position is for safety over aesthetics and there is room for significant improvement

Commissioner Burrows

- Primarily concerned with visual and historic impacts of the project
- There must be a way to save the cypress trees at Sheffield Drive and the Memorial Oaks between Carpinteria and Summerland
- Supports Hermosillo Road not being the only exit to the western end of Coast Village Road; need to have an exit at Cabrillo/Hot Springs
- The project should incorporate improvements to the San Ysidro Road interchange as well as the Posolipo on-ramp.
- Concerned about the impacts of the soundwalls on property owners, but is happy that Caltrans has a process in place for the neighbors to provide input on the treatment and location of soundwalls

Commissioner Gottsdanker

- There is a lack of information in the Draft EIR regarding the Sheffield Drive interchange and no alternatives, especially as compared to the Cabrillo/Hot Springs Road interchange
- The Sheffield Drive interchange is barely used by the public, so it should be able to retain the existing configuration
- That interchange represents the gateway to the community coming from the south
- That segment needs to be redesigned to reduce the pavement width
- The visual impacts of the changes to that interchange need to be evaluated from the beach at Fernald Point; need a visual simulation from the beach

Commissioner Eidelson

- The project needs to protect the entrance to the community coming from Summerland
- Landscaping is important
- Property values are important too, and the potential negative impact to property values in the area is of concern
- Caltrans should give special consideration to the Montecito Association and Bob Short and consult with them through this process to develop a workable solution

Commissioner Overall

- There is a need for flexibility and special consideration through the corridor to maintain the local character
- The format of the document does not serve the public well as an informational document; it is difficult to understand and the necessary reference materials were not readily available for review
- There is a need to look at the underlying assumptions for this project

- A lack of funding has led Caltrans to not consider the purchase of ROW despite the potential to improve the project with additional ROW; this should be re-examined
- Recent information has come out indicating that HOV lanes do not encourage carpooling and actually reduce the total capacity of the highway; this assumption should be re-examined
- The anytime in and out HOV lane is a significant flaw in the project because it encourages more weaving through the travel lanes
- The HOV lanes will require a fourth lane in Montecito
- Major impacts to the Montecito community include impacts to visual resources and the protracted construction schedule
- Visual simulations distort views and are misleading and minimize depiction of vegetation removal and retaining walls
- Sheffield interchange is a gateway to Santa Barbara. There should be a project alternative that evaluates alternatives to the Sheffield Drive interchange, including closing the ramps completely, closing the southbound on and off ramps, or retaining the left-hand ramps
- Need to consider who is using that interchange in designing it
- The fact that improvements to Olive Mill Road and San Ysidro Road interchanges were not included as part of this project is a major oversight
- There is a lack of traffic data incorporated into the EIR
- Traffic data related to Cabrillo and Milpas areas over the last few years is likely distorted due to construction activities and should not be relied upon in the traffic analysis
- It is inefficient use of funding to completely reconstruct the Cabrillo/Hot Springs Road interchange simply because of the left-hand ramps; that money could be better used elsewhere
- Alternatives to this interchange including the purchase of ROW to enlarge the roundabout should be considered
- It is difficult to read the document and make judgments regarding tradeoffs between road widths and median landscaping due to a lack of information regarding lane and shoulder widths. This information should be provided and made clear with accurate visual representations
- Pockets of median landscaping should be worked into the Montecito portion of the corridor in order to soften visual impacts
- Construction impacts are not adequately evaluated in the EIR
- Would like to see more alternatives and design exceptions considered and the document recirculated for further review and comment

Santa Barbara County Planning Commission Briefing and Attached Comments

In addition to submitting its comment letter along with attachments from the Historic Landmarks Advisory Commission and Fire Department, the County of Santa Barbara submitted a summary of minutes from a Joint County Planning Commission/Montecito Planning Commission Briefing held June 6, 2012. As one of the agenda items at that meeting, the South Coast 101 HOV Lanes project was discussed by the commissioners. Public comments were also provided to the County of Santa Barbara Planning Commissioners and were attached to the County's letter.

These comment letters were sent to the County Planning Commissioners in anticipation of the hearing. They were sent to the County Planning Commission to facilitate any decision process and provide content for the preparation of the County's comments to Caltrans. During the briefing, the Planning Commissioners and/or Santa Barbara County staff announced that comments submitted orally or written would not be accepted and any comments should be directed to Caltrans. As a result, many of the attached comment letters are very similar or duplicates of those received by Caltrans. Of the following attached letters, only those that weren't sent directly to Caltrans are responded to.

The following individuals or groups provided a letter to the County:

Planning Commissioner's Verbal Comments (no response needed)

Las Aves Business Complex (refer to page 228)

Montecito Association - May 30, 2012 (refer to page 230)

South Coast 101 HOV Lanes Project Frequently Asked Questions for the County-Montecito Planning Commission Joint Meeting, June 6, 2012

Randall and Shelley Badat - May 7, 2012 (refer to page 306)

Karla Bonoff - April 29, 2012 (refer to page 582)

J'Amy Brown - April 30, 2012 9 - (refer to page 325)

Serena Carroll - April 28, 2012 (refer to page 583)

Mark and Barbara Hacken - April 29, 2012 (refer to page 593)

Lynda Hickman - April 30, 2012 (refer to page 597)

Darryl Hickman - April 30, 2012 (refer to page 596)

Doralee S. Jacobson - May 8, 2012 (refer to page 410)

Jeffrey MacCorkle - April 24, 2012 (refer to page 605)

John S. Handloser - April 26, 2012 (refer to page 393)

Diane Handloser - April 26, 2012 (refer to page 390)

Sybil Rosen - April 26, 2012 (refer to page 612)

Carla Tomson - April 26, 2012 (refer to page 619)

Thorn Robertson - May 10, 2012 - (refer to page 619)

Justin Ruhge - May 8, 2012 (refer to page 521)

Save Our Village (Pujo and Associates) - April 30, 2012 (refer to page 270)

Martha Siegel - April 25, 2012 - (refer to page 539)

Bruce Russell/Andrew Oakley - May 16, 2012 (refer to page 523)

Nina Warner - April 26, 2012 (refer to page 568)

Caren and Erwin, Sokol - April 23, 2012 (refer to page 617)

Mike Zoradi and Susan Malde - April 29, 2012 (refer to page 578)

Chandra L. Wallar, Executive Officer County of Santa Barbara

General Response

Throughout its project development process, Caltrans seeks to be consistent with the California Coastal Act and local coastal plans. Caltrans recognizes and appreciates the need for a Coastal Development Permit and Local Coastal Plan Amendments so that this project gains the necessary approvals. In fact, amendments to the Local Coastal Plans for the City of Carpinteria and Santa Barbara County are currently in process.

Through careful consideration of the current environment and thoughtful design, Caltrans has worked to tailor the project to avoid or minimize coastal impacts as much as possible. This has been achieved by extensive study of the project area, obtaining many exceptions to its standard design process, adjusting the freeway design in consideration of resources, and removing soundwalls from the project where they are not reasonable or feasible. Further along in this project's process, as Caltrans refines its details, Caltrans staff will work with Santa Barbara County and the Cities of Carpinteria and Santa Barbara to address the requirements of the California Coastal Act.

Some local agencies combine their CEQA and coastal permitting processes. This is appropriate for agencies with a Local Coastal Plan and lead agency status under the California Environmental Quality Act. In the case of this project, Caltrans is lead under the California Environmental Quality Act and, as a state agency, adheres to an established state process in which the California Environmental Quality Act and the California Coastal Act are addressed separately. In general, the California Coastal Commission staff comments on the Draft Environmental Impact Report/Environmental Assessment make a number of recommendations and reference information that are not necessarily required during the California Environmental Quality Act process and are beyond the scope of the process for which this document was written. The Local Coastal Plans and any needed amendments are related but

distinctly different and stand-alone actions. Caltrans appreciates the comments and will work with Coastal Commission staff to address them during the coastal permitting process.

The South Coast 101 HOV lanes proposal is one project in a larger consensus-approved package of improvements that came out of the SBCAG-sponsored *101 In Motion* process. This larger package, which has since been further funded through the Measure A local transportation sales tax measure and included as planned improvements in the 2008 Regional Transportation Plan, provides a multimodal approach to long-term congestion relief in this corridor. In relation to the South Coast 101 HOV Lanes project alternatives, the No-Build Alternative would result in decreased coastal access due to increased delays on U.S. 101, the main travel artery in the region. Pedestrians and bicycle traffic are prohibited on U.S. 101 in the project area. However, the project would maintain any bicycle or pedestrian facilities on the local street system that would otherwise be directly impacted by the project. Caltrans will coordinate with the City of Santa Barbara and SBCAG in the endeavor to replace the existing railroad structure that is a deterrent to bicycle and pedestrian connectivity. Additionally, Caltrans will work with local partners and Coastal Commission staff during the Coastal Development Permit process to address any needed Local Coastal Plan Amendments.

County of Santa Barbara

Comment 1 Pedestrian and Bike Paths

Because the project is an HOV lanes project and most work will occur on the highway, added benefits with regard to coastal access will be realized. Improvements would primarily come as a result of an added lane for each direction on the highway. The added lanes would help decrease congestion, and the reconstructed interchanges would improve circulation for local traffic and recreational drivers trying to reach the water. There are no significant upgrades proposed to pedestrian or bicycle facilities as part of this project. Any existing facilities would be retained in their present configuration or replaced in kind. Separate from the HOV lanes project is a coordinated effort led by the Santa Barbara County Association of Governments to build the Coastal Route Bike path connection between Santa Claus Lane and Carpinteria Avenue and the Rincon Coastal Trail. Each of these trails/paths would provide critical links in the local and regional trail system.

County of Santa Barbara

Comment 2 Santa Claus Lane Streetscape Improvements

Because the preferred alternative (Alternative 1) allows for flexibility at this location, the Caltrans design team was able to make changes in response to the County's request to widen toward the median at this area. The South Coast 101 HOV Lanes project design team will continue to consider the Santa Claus Lane conceptual plan during the upcoming design phase. We agree that careful coordination between Caltrans and the County of Santa Barbara is necessary to prevent conflicts between the proposed project and the County's improvement plan for Santa Claus Lane.

County of Santa Barbara

Comment 3 Santa Claus Lane Streetscape Improvements

The South Coast 101 HOV Lanes project does not include plans to improve the southbound Santa Claus Lane on-ramp as these improvements are not

essential to providing the added lane within the project limits. Nor does the South Coast 101 HOV Lanes project preclude County-proposed improvements such as traffic calming measures to slow down vehicles along Santa Claus Lane. Caltrans will continue to coordinate with the County as the Santa Claus Lane plans continue to evolve. It is likely most effective for the County if easements, right-of-way exchange, and other arrangements associated with the Santa Claus Lane improvements were to occur separate from the HOV project. Mitigation is added to a project as a means to reduce significant impacts that the project is having to the environment. The project is not resulting in a significant impact that would require mitigation of this nature.

County of Santa Barbara

Comment 4 Santa Claus Lane Streetscape Improvements

Please refer to response to comment 3 above.

County of Santa Barbara

Comment 5 Beach Access

As indicated in the draft environmental document, the only resource with significant impacts that cannot be mitigated is visual/aesthetic resources both individually and cumulatively. The draft environmental document already included minimization measures for the project, designed to reduce visual and other anticipated project impacts. While there are no current plans to contribute funds toward the Santa Claus Lane Streetscape Beach Access and Parking project, Caltrans and County of Santa Barbara staff will continue to work together on a plan that works best for both parties. This action is separate from the California Environmental Quality Act/National Environmental Policy Act process. The discussion will continue as the project makes its way through the Local Coastal Plan Amendment and Coastal Development process. As now discussed in Section 1.3 of the final environmental document, the preferred alternative was modified to accommodate the Santa Claus Lane parking plan.

Regarding the Memorial Oaks, they were determined not to be eligible as a Historic Resource. They are analyzed strictly for their potential scenic value along with other corridor vegetation on pages 135-137 of the Draft Environmental Impact Report/Environmental Assessment. Applicable mitigation measures associated with the Memorial Oaks' visual condition are identified in Section 2.1.6, Chapter 3, and Appendix F of the draft environmental document. All landscaping and aesthetic design elements will be developed in collaboration with representatives of each affected community, in addition to a thorough review by the permitting jurisdiction. The Memorial Oaks Focus Review Group has contributed ideas for Memorial Oaks-related design treatments that will be given additional consideration in the design phase of the project.

County of Santa Barbara

Comment 6 Community Plan Policies – Toro Canyon Plan (TCP)

This project is an HOV lanes project, and most work would occur on the highway within the State right-of-way. These actions and policies related to Santa Claus Lane are outside the scope of the HOV lanes project. However, Caltrans will continue to coordinate with the County's implementation of pedestrian and bicycle facility improvements as an ongoing practice. These goals cannot be met through this project alone. South Coast 101 HOV Lanes project improvements within the Toro Canyon Plan area are proposed to primarily occur within the State Highway right-of-way. In areas where HOV project features, including soundwalls, are proposed adjacent to existing County-owned and pedestrian facilities, widths are preserved and/or improved. In regard to the Memorial Oaks and Santa Claus Lane Streetscape improvements, please see the response to comment 5 above.

County of Santa Barbara

Comment 7 Summerland Community Plan (SCP)

A freeway overpass or underpass in the vicinity of Greenwell Avenue is outside the scope of the proposed project. A separate planning and/or project study is needed to identify specific needs and related goals to be achieved by the crossing(s) and then identify and study-related alternative alignments. Once this work is completed, environmental studies are performed, and a preferred alignment is selected, Caltrans can consider the alignment in the context of the South Coast 101 HOV Lanes project.

County of Santa Barbara

Comment 8 Summerland Community Plan (SCP)

The Draft Environmental Impact Report/Environmental Assessment identifies significant visual impacts through Summerland and along the entire project corridor. Mitigation measures are included to address aesthetic treatment to new and modified structures, walls and barriers. Refinement of aesthetic design details, though not required to meet the intent of mitigation, will be developed in collaboration with representatives of each affected community. In addition, each local coastal permit may include permit conditions that are beyond the California Environmental Quality Act-required mitigation. The environmental document recommends against constructing three soundwalls in Summerland to avoid blocking prime ocean views.

County of Santa Barbara

Comment 9 Montecito Community Plan - Circulation

Caltrans supports City and County planning efforts to improve these intersections and will coordinate with City and County staff to study appropriate improvement options. However, Caltrans has no plans to improve these intersections as part of the South Coast 101 HOV Lanes project.

Three Olive Mill intersections were analyzed as part of the traffic studies conducted for the project: Northbound off-ramp/Olive Mill (#39), North Jameson Lane/Olive Mill (#39a) and SB on-ramp/Olive Mill (#40). The table below shows levels of service (LOS) and the seconds of delay for configurations F and F Modified as reported in the Cabrillo/Hot Springs Interchange Configuration Analysis Technical Memorandums (March 21, 2011 and July 19, 2011). This information supersedes the values shown in the Forecast Operations report as the superseding reports provide outputs related to specific Hot Springs/Cabrillo configurations.

ID		Existing Condition	2040 No-Build	2040 Build
39	NB off-ramp/ Olive Mill	D/31.3s -AM C/16.6s -PM	E/37.9s -AM E/47.9s -PM	E/37.9s -AM E/47.9s -PM
39a	North Jameson Lane/ Olive Mill	C/15.4s -AM B/11.4s -PM	C/20.1s -AM C/16.7s -PM	C/20.1s -AM C/16.7s -PM
40	SB on-ramp/ Olive Mill	B/14.7s -AM B/14.4s -PM	C/17.1s -AM F/66.6s -PM	C/15.1s -AM E/38.1s -PM

Level of Service (LOS) identified by Letter grades; "s" = seconds

As noted in the table above, 2040 build conditions are projected to be the same or better than 2040 no-build conditions at these intersections. Impacts were identified in the traffic studies at this location since the LOS values were lower than "C" in the forecast year. Having an impact does not automatically make the impact significant under Caltrans criteria or CEQA criteria and the project traffic studies did not identify changes as significant environmental impacts under CEQA. Although local agencies may set their own thresholds for determining CEQA significance for local projects, when determining significance under CEQA, the State considers the type of project proposed—a congestion relief project in this case—and the degree of increased delay at spot locations relative to the overall congestion relief benefits of the project.

As identified in Section 2.1.5 of the draft environmental document and the California Environmental Quality Act checklist in Appendix A, these impacts were considered to be less than significant per the California Environmental Quality Act. Improvement of those intersections is outside the scope of this project and should be addressed separately.

County of Santa Barbara

Comment 10 Summerland Community Plan (SCP) Update

Opportunities for meeting the intent of the future Summerland Community Plan will continue during the Coastal Development Permit process. Ongoing collaboration efforts between the County of Santa Barbara and Caltrans can help both agencies find creative solutions toward reunifying the community with the ocean and further enhancing coastal and multimodal connections.

County of Santa Barbara

Comment 11 Traffic Operations

The Forecast Operations Report (originally prepared October 19, 2009, and amended December 9, 2011) and the Cabrillo/Hot Springs Interchange Configuration Analysis Technical Memorandums (March 21, 2011 and July 19, 2011) were prepared as part of the traffic technical studies to support the environmental document. The studies were made available to the public on the Caltrans District 5 website during the public review period. They were also available in the form of a CD contained in several area libraries and could be requested as part of the records request process. Because the traffic studies are lengthy and are incorporated by reference, only significant traffic impacts resulting from the project were included in the draft environmental document. This is in keeping with CEQA Guidelines that encourage agencies to disclose key environmental issues only and to eliminate unneeded bulk in an Environmental Impact Report [Section 15140-15151].

The Forecast Operations Report (amended December 9, 2011) did not characterize traffic impacts as being significant environmental impacts under the California Environmental Quality Act (CEQA) or the National Environmental Policy Act (NEPA). Project-level impacts and cumulative-plus-project impacts were identified, however having an impact does not automatically make the impact significant under Caltrans or CEQA criteria or under NEPA.

Although local agencies may set their own thresholds for determining CEQA significance for local projects, when determining significance under CEQA, the State considers the type of project proposed—a congestion relief project in this case—and the degree of increased delay at spot locations relative to the overall congestion relief benefits of the project.

The purpose behind this project is to improve poor travel conditions that exist and are projected to worsen under a no-build scenario on U.S. 101 in the South Coast while also encouraging a mode shift to carpooling and transit. The delay changes at the above-referenced locations are largely the result of travelers having the ability to travel at times under the build condition that they would find problematic under no-build conditions. Based on the traffic analysis, this change in travel patterns provides for delay reduction at some intersections while adding delay in others.

The final determination by Caltrans was that the impacts identified in the traffic studies do not reach a level of significance that requires mitigation. This determination is rooted in the fact that the purpose and need for the HOV project is to provide significant daily congestion relief in the larger corridor and the traffic studies demonstrate that this overall congestion relief is achieved by the project (the project is anticipated to result in nearly 14,000 person hours of delay savings daily in 2040). Intersections outside the project limits where some increases in delay are projected to occur under a build

scenario are tradeoffs associated with the project and are not significant in comparison to the overall level of congestion relief achieved by the project.

Because several traffic-related questions were raised by local jurisdictions during the comment period, additional information has been added to Section 2.1.5 (Traffic) and Section 2.5 (Cumulative Impacts).

County of Santa Barbara

Comment 12 Project Need – Figure 1-13, page 11

Text was added to Section 1.2 (Project Need) of the final environmental document to explain Figure 1-3.

County of Santa Barbara

Comment 13 Build Alternatives

The sentence containing the word “mainly” was intended to convey the fact that the project would be constructed within the right-of-way, but there are a few minor exceptions where a subsurface easement or temporary construction easement may be needed to construct a retaining wall or soundwall.

County of Santa Barbara

Comment 14 Cabrillo Boulevard Interchange

Background

For this project, only two interchanges along the 10-mile length need to be reconstructed because of the addition of lanes. The Cabrillo Boulevard and the Sheffield Drive interchanges, both in the vicinity of Montecito, must be reconstructed to accommodate the final configuration of six lanes. The locations of the existing left-side ramps at Sheffield Drive do not allow for the lane improvements to be constructed through the interchange without ramp reconstruction or excessively costly avoidance of the ramps. The off-ramps present at Cabrillo Boulevard have significant operational limitations,

including limited stopping sight distance and collision rates above statewide averages. Since the left-side ramps at both locations need to be reconstructed and/or relocated, they must be constructed to address current engineering standards.

To provide further clarification of highway design issues for left-side ramps, a fact sheet was prepared and added to the final environmental document as Appendix J. The fact sheet explains the operational problems associated with left-side ramps, including the fact that left-side ramps are increasingly rare on freeways because they do not meet driver expectations.

Additional details related to the Sheffield Drive interchange have been added to Section 1.3.6 of the final environmental document and Appendix I (Presentation at SBCAG Meeting of May 2013) and Appendix J (Left-side Ramps Fact Sheet). The information includes other interchange options that were considered for this location but not selected. Similarly, additional details were added for the Cabrillo Boulevard/Hot Springs Road Interchange in the same sections of the final environmental document.

County of Santa Barbara

Comment 15 Sheffield Interchange

As mentioned in the response above, additional explanation was added to the final environmental document in Section 1.3.6, Appendix I, and Appendix J.

The project design team considered several configurations for the Sheffield interchange, which has limited flexibility for reconstructing due to extremely restrictive right-of-way and topography. Options that were considered included retention of existing left-side ramps, removal of one or more southbound ramps, or a full closure of this interchange (closing all ramps). Upon consideration of these options, only a tight diamond interchange (the option proposed) was determined to be viable. Reasons for dismissal of those

preliminarily considered options include: required retention of left-side ramps to prevent creation of a partial interchange, removal of existing access for adjacent landowners, traffic volume diversion onto adjacent local streets such as North Jameson, and impacts related to improvements that would be required at adjacent interchanges to accommodate diverted volumes.

Caltrans assessed the impacts to adjacent interchanges to accommodate the diverted traffic volumes if partial or full ramp closures were to occur at the Sheffield interchange. These assessments concluded that significant changes would be required at the San Ysidro Interchange, including right-of-way acquisitions from two listed historical properties at the North Jameson/San Ysidro intersection. As these impacts could be avoided through reconstruction of the Sheffield Interchange as proposed, full or partial ramp closure options at the Sheffield Interchange (to avoid reconstruction) were not pursued.

County of Santa Barbara

Comment 16 Utility Undergrounding

Currently, there is no proposal to underground any of the utilities that exist aboveground. As currently proposed, the project does not require relocation of any existing power poles. However, this situation could change during the final design phase when details are solidified and final soundwall locations are determined. This issue would be addressed during the final design phase and Coastal Development Permit process.

County of Santa Barbara

Comment 17 Comparison of Alternatives with Similarities

Table 1.2 was replaced by Figure 1.7 in the final environmental document to provide a format that best shows the locations where the build alternatives overlap. Note that there were a few modifications, including the area adjacent to Santa Claus Lane where the lane widening will now occur toward the median to avoid conflicts with the County's plans for Santa Claus Lane.

County of Santa Barbara

Comment 18 Permits and Approvals Needed

Table 1.4 was revised in the final environmental document to reflect the fact that a Local Coastal Plan Amendment, in addition to the Coastal Development Permit, is required by the County of Santa Barbara.

County of Santa Barbara

Comment 19 Existing and Future Land Use

The acreages for Montecito were corrected in Section 2.1 of the final environmental document.

County of Santa Barbara

Comment 20 Proposed Development

Table 2.1 has been revised to show the City of Santa Barbara has jurisdiction over the Milpas Street to Hot Springs Road project and the City of Carpinteria has jurisdiction over Linden Avenue to Casitas Pass Road.

County of Santa Barbara

Comment 21 Consistency with State, Regional and Local Plans

Revisions were made to Section 2.1.1.2 of the final environmental document to correct the title of the Highway 101 Corridor Design Guidelines and provide an explanation of the purpose of the guidelines.

County of Santa Barbara

Comment 22 Consistency with State, Regional and Local Plans

Revisions were made to Section 2.1.1.2 of the final environmental document to capture the fact that both the Montecito Community Plan and the Summerland Community Plan contain language relating to highway widening.

County of Santa Barbara

Comment 23 Consistency with State, Regional and Local Plans

Corrections were made to Volume I, Section 2.1.1.2 of the final environmental document to reflect the correct buffer limits for rural and urban areas as well as adding the Toro Canyon Plan to the list of plans that contains buffer limits.

County of Santa Barbara

Comment 24 Montecito Community Plan Tree Protection Policies

The project proposes to preserve specimen trees—trees with unusual scenic or aesthetic quality, historic value, and biological value—to the greatest extent feasible and therefore is consistent with the Montecito Community Plan policies as identified: BIO-M-1.15 and BIO-M-1.16, and development standards BIO-M-1.15.1 and BIO-M-1.16.1.

County of Santa Barbara

Comment 25 Design Guidelines References

The text was corrected in the final environmental document as follows: "The project would be potentially inconsistent with the Summerland Community Plan, City of Santa Barbara Conservation Element and Coastal Parkway Design Guidelines, and Santa Barbara County Highway 101 Corridor Design Guidelines."

The text in the final environmental document was corrected in two sentences as follows: The project would also potentially conflict with the City of Santa Barbara Coastal Parkway Design Guidelines that identify The project would also potentially conflict with the City of Santa Barbara Coastal Parkway Design Guidelines that list the

The text was corrected in the final environmental document for Table 2.2 (fifth line of second column) to read: Santa Barbara County Highway 101

Corridor Design Guidelines. Additional guidelines have been included in Table 2.2.

County of Santa Barbara

Comment 26 Specimen Tree Protection

The project proposes to preserve specimen trees, trees with unusual scenic or aesthetic quality, historic value, and biological value to the greatest extent feasible and therefore is consistent with Montecito Community Plan policy BIO-M-1.15 and SCP policy BIO-S-6. No known raptor nests or monarch butterfly roosts occur in trees within the project footprint. Measures are now in place to avoid eucalyptus trees south of U.S. 101 at post mile 8.7 that were found to support double-crested cormorants' nests. The draft and final environmental document show via project mapping, photo-simulations and discussion the extent of vegetation removal associated with the project. The draft and final environmental document identify significant impacts related in part to the removal of vegetation throughout the corridor. This finding is based on the existing visual character and quantity of existing vegetation and not on the specific number of existing or affected trees and shrubs. In addition, visual mitigation for impacts related to vegetation loss is viewer based rather than ratio based.

County of Santa Barbara

Comment 27 Avoidance, Minimization, and/or Mitigation Measures

The list of local coastal policies immediately following Table 2.2 was corrected in the final environmental document to include biological resources. This omission was an oversight.

County of Santa Barbara

Comment 28 Coastal Zone

A Local Coastal Plan Amendment and Coastal Development Permit are required for the project. This information is noted in Section 2.1.1.3 and Table

2.2 in the final environmental document. The requirement for a Final Development Plan was not added to the document.

County of Santa Barbara

Comment 29 Parks and Recreation

Table 2.3 has been modified along with the text in the final environmental document to include Loon Point, which contains public parking and a trail that provides public access to the beach and is overseen by the Santa Barbara County Park Commission. The Santa Claus Lane location will be included in Table 2.3, but the text will indicate that it is a plan that includes proposed public access along with beach parking, but has not yet been constructed.

County of Santa Barbara

Comment 30 Growth

This paragraph was rewritten in the final environmental document as follows: Eight residential locations, shown in Figure 2-4, were selected for testing the growth-related effects of the project. These residential locations include the communities of Goleta, Hope Ranch, Montecito, Summerland/Toro Canyon, City of Santa Barbara/Mission Canyon (Mission Canyon is not part of the City of Santa Barbara), City of Carpinteria, Ojai (City of Ojai and Ojai Valley), and City of Ventura. These communities are planning for up to a 4 percent growth in population by 2040 (this information was updated from the draft environmental document, which incorrectly stated there could be up to 55 percent growth in Hope Ranch).

County of Santa Barbara

Comment 31 Community Impacts

Demographic data for the draft environmental document was taken from the Community Impact Assessment (CIA) study that had been prepared for the project prior to the 2010 census. Since releasing the draft environmental document, an addendum to the CIA was prepared using 2010 census

information. As a result, Section 2.1.3 (Community Impacts) of the final environmental document was updated with 2010 census data where available. Although the population for Santa Barbara County has increased (in the north part of the county), much of the population in the project limits has decreased by approximately 6.1 percent.

County of Santa Barbara

Comment 32 Intersection Safety

Safety is paramount in the development of standards. Standards are revised over time as new information becomes available. Also the application of standards for a given roadway can change as conditions evolve, such as right-of-way access being controlled, higher speed limits and heavier traffic usage.

For any state roadway, if spot locations develop a collision history of significance to satisfy safety program criteria, a safety project would be proposed. The Montecito freeway section has not experienced correctable collision patterns of that magnitude. Safety program criteria evaluate the benefit of collisions that would be reduced and cost of the proposed safety projects.

The southbound on-ramp at Posilipo Lane has not experienced accident rates higher than the statewide average. For the three-year period of October 1, 2006 to September 30, 2009, there were no recorded accidents for this ramp. Work on this ramp is not planned as part of the South Coast 101 HOV Lanes project.

For the South Coast 101 HOV Lanes project, the Cabrillo Boulevard interchange and the Sheffield Drive interchange must both be reconstructed to accommodate the final configuration of six lanes. The existing locations of the left-side ramps do not allow for construction of the lane improvements. Since the ramps need to be relocated, they must be constructed to address

current-day engineering standards. For more information refer to Appendix J (Left-side Ramps Fact Sheet).

County of Santa Barbara

Comment 33 Sheffield Interchange

In response to public comments received on the draft environmental document and at the request of the County of Santa Barbara, the interchange design for Sheffield Drive has been modified to incorporate two separate bridge structures to provide a narrow median between them. This was accommodated without the need to widen the outside construction area of the proposed ramps. Refer to Section 1.3 in the final environmental document for a description of the preferred alternative (a modified version of Alternative 1). Please also see the response to the County of Santa Barbara comment 15.

County of Santa Barbara

Comment 34 Existing Traffic Baseline in Forecast Operations Report

The auxiliary lane (or merging lane) proposed at the Sheffield Interchange is required as a companion feature to the reconstructed interchange (southbound ramps and southbound lanes reconstructed in new locations.) Because the interchange is going to be a new configuration and the distance between the Sheffield Interchange and the Evans Interchange is nonstandard, an auxiliary lane is being added in compliance with standards of the Highway Design Manual (HDM). Since this auxiliary lane is being placed as a HDM design requirement, this specific auxiliary location did not need to be studied in the Forecast Operations Report. No update of the report is required.

County of Santa Barbara

Comment 35 LOS Intersection Thresholds

The traffic studies prepared for the South Coast 101 HOV Lanes project were quite comprehensive despite the fact that Caltrans is not required to meet or

evaluate traffic conditions using local thresholds. Refer to the response to the County's comment 11 for further explanation.

County of Santa Barbara

Comment 36 Traffic Environmental Consequences

The freeway traffic analysis shows that the existing bottleneck downstream of the Las Positas Interchange is the cause of the slight increase in person hours (25 person hours) of delay. When the other upstream bottlenecks are cleared up by this project, more vehicles will be able to reach their destination quicker except for those vehicles with a destination located downstream of the Las Positas Interchange. At that point, vehicles will still queue up to try to make their way through the existing bottleneck. Based on the fundamentals of traffic flow, this slight increase in total person hours of delay is minor in the context of the overall 27.5-mile-long corridor. When comparing the No-Build Alternative with existing conditions, there is a volume increase of 1332.8%; but, when comparing the Build Alternative to the No-Build Alternative, there is a mere 0.4% volume increase. So, the impact at this one specific location is inconsequential.

County of Santa Barbara

Comment 37 Traffic Redistribution

The draft environmental document disclosed that some delay increases are expected at a number of intersections associated with this project within and outside of the project limits. Some of these intersections are under local jurisdiction; others are under state jurisdiction. Specific information about the locations where these changes occurred and the extent of added delays were provided in the traffic studies, which were available for review throughout the public comment period for the draft environmental document. See the response to comment 11 for additional information.

County of Santa Barbara

Comment 38 Olive Mill and Coast Village Road Intersection

Refer to response for comment 9.

County of Santa Barbara

Comment 39 Primary and Secondary Intersections and LOS

The definitions provided for primary and secondary intersections consider the context of the Cabrillo Boulevard/Hot Springs Road Interchange improvements. It should be noted that the five configurations considered for the proposed interchange vary in how they each distribute traffic. Primary locations are defined as intersections that would be physically altered by an interchange configuration. Secondary locations are defined as intersections that would not be physically altered by a configuration design, but could be potentially affected by diverted traffic. Refer to Volume I, Section 2.1.5 below the Cabrillo Boulevard/Hot Springs Interchange heading. Refer to Figure 2.8 for level of service details for various intersections.

County of Santa Barbara

Comment 40 Traffic Safety

Additional information was added to Section 2.1.5 of the final environmental document to better clarify the collision situation.

The Forecast Operations Report evaluated these locations to determine if proposing auxiliary lanes would enhance operational performance. The locations were selected based on field conditions that provided a shorter weaving length than is standard per the Highway Design Manual. The analysis indicated that auxiliary lanes at these locations could provide improved operations in 2040. These improvements, however are not essential to the purpose and need of the HOV project, are not precluded by the HOV project, and could be constructed separately with another project in the future. Furthermore, safety conditions in both directions between Olive Mill Road

and San Ysidro Road, as well as other segments throughout the corridor, have been analyzed. Most (96 percent) of the accident types can be attributed to unstable traffic flow caused by congestion. Since the project purpose is to reduce congestion by adding part-time HOV lanes, the rate of freeway accidents is expected to drop.

County of Santa Barbara

Comment 41 Bicycle and Pedestrian Improvements

As indicated in the response to Santa Barbara County's comment 3, a change in the project design for Alternative 1 (preferred alternative) occurred in the vicinity of Santa Claus Lane so that a retaining wall is no longer needed. Any plans for improvements within the County right-of-way and outside of the State access-controlled right-of-way near Santa Claus Lane will not be impacted by the South Coast 101 HOV Lanes project.

Where bicycle and pedestrian improvements are desired by local agency policy to cross over or under the freeway, there will be continued coordination between the agencies. However, although not part of the current project, the project would not preclude those facilities from being undertaken as planned by the City of Santa Barbara and the Santa Barbara County Association of Governments (SBCAG).

The project is not anticipated to permanently affect parking, bicycle facilities or pedestrian facilities, including the Pacific Coast Trail. All pedestrian facilities within the project limits that are modified as part of this project would comply with the Americans with Disabilities Act (ADA). During construction, consideration would be given to bicycles, pedestrians, and persons with disabilities for continued access through construction areas. Any improvements installed with the future City of Santa Barbara project for a bicycle and pedestrian sidewalk through the Cabrillo Boulevard Interchange

will also be modified, including ADA-compliant ramps, as necessary with the construction of the new on- and off-ramps.

County of Santa Barbara

Comment 42 Summerland Community Plan-- Park, Recreation, Trail (PRT) Corridors

The proposed project is consistent with Section 35-191 (Summerland) and Section 35-215 (Montecito) of the Santa Barbara County Coastal Zoning Ordinance. The project would not adversely impact recreational facilities and users. This statement is further explained for each of the locations cited in your comment:

- Via Real: The proposed retaining walls are within the State access-controlled right-of-way and should not conflict with any improvements proposed within the County right-of-way. Selection of Alternative 1 as the preferred alternative eliminates any further concern.
- Evans Avenue and Padaro Lane: The bridge widening proposals at Evans Avenue and the S. Padaro undercrossings would accommodate lane widening in the median. All modes of travel, including pedestrians, will be allowed through the construction area. There is no proposed bridge widening at the N. Padaro Lane overcrossing.
- Wallace Avenue Bike Path: There is no planned pavement widening south of the southbound freeway lanes from Wallace to the North Padaro southbound off-ramp. There is planned slope protection work within the Greenwell Creek channel. Neither of these features appear to preclude a future Class I path area.
- North and South Jameson Lane: The proposed soundwalls are to be constructed within the State access-controlled right-of-way. So, this should not conflict with any existing or proposed improvements within the County right-of-way.

County of Santa Barbara

Comment 43 Bicycle and Pedestrian Access

Construction of a bike/pedestrian pathway under the Union Pacific Railroad bridge is an outstanding coastal development permit requirement for the U.S. 101 Operational Improvement project (from Milpas Street to Hot Springs Road). The City of Santa Barbara, in coordination with SBCAG, has taken the lead on the preliminary design of the project that would replace the railroad bridge and provide improved bicycle and pedestrian access within the Union Pacific and City of Santa Barbara rights-of-way. SBCAG will provide funding for the preliminary design work and will continue seeking additional funds. This project is being handled separately from the South Coast 101 HOV project and will have its own environmental document.

County of Santa Barbara

Comment 44 Bicycle and Pedestrian Routes

Following release of the draft environmental document, the Santa Barbara County Association of Governments (SBCAG) committed to taking the lead on two separate projects that will be considered as part of the Local Coastal Plan Amendment package for the City of Carpinteria. Refer to Section 2.1.5 of the final environmental document under Pedestrian and Bicycle Facilities. The amendment is moving forward for both the South Coast 101 HOV Lanes project and the Linden and Casitas Interchanges Improvement project. The first of these projects is the Coastal Route Bike Path that will extend from Santa Claus Lane to Carpinteria Avenue. This Class I path will close the coastal trail gap. The second project is the Rincon Coastal Trail that will extend from Carpinteria Avenue to Rincon County Park and will close the coastal trail gap between Carpinteria Avenue and the new Class I trail along U.S. 101 at Rincon. Caltrans is not aware of any current plans that would connect Class I bike paths and/or pedestrian paths from the areas of Evans Avenue to Padaro Lane on the south side of the highway.

County of Santa Barbara

Comment 45 County Comprehensive Plan Visual Impacts

Section 2.1.6 (Visual/Aesthetics) of the final environmental document was revised to discuss the potential visual impacts related to the Evans Avenue bridge expansion as follows: All three project alternatives required the widening of the Evans Avenue. Although the profile of the structure would not appreciably change, the wider bridge deck would result in a somewhat longer “tunnel-effect” while traveling on Evans Avenue. Views to surrounding coastal resources would not be greatly affected; however, the larger mass of the bridge would contribute to a more urbanized visual character.

The draft environmental document acknowledged a high degree of viewer sensitivity throughout the project’s length based in large part on review and understanding of the applicable community visual policies. The high degree of sensitivity indicated in these local policies is included in the Federal Highway Administration visual assessment process, which resulted in a finding of increased visual impact in the Summerland, Montecito, Padaro, Carpinteria and Santa Barbara assessment units. The draft environmental document made the finding and fully disclosed that significant adverse visual impacts on scenic vistas, substantial damage to scenic resources, and substantial degradation of visual character would occur as a result of the project. The draft environmental document also made the finding that these adverse impacts, although lessened through specific mitigation measures listed in the document, would not reduce the impacts to a less than significant level. Section 2.1.6 (Visual/Aesthetics) of the draft environmental document included 27 Observer Viewpoints both from on the highway and from the surrounding communities. Observer Viewpoints include three within the Padaro assessment unit, seven within the Summerland unit, and three within the Ortega Hill area.

The draft environmental document considered the visual condition of the entire project and does not limit its findings or mitigation measures to only those specific views shown in the Observer Viewpoint locations. The total number of potential viewpoints associated with the project is infinite, and the Federal Highway Administration process recognizes that it is not possible to show every possible viewing scenario for a project. Applicable visual policies are cited and included in the analysis, existing visual conditions are discussed, and the proposed project is thoroughly presented and disclosed in map form, text narrative, illustrations and simulations. The extent of potential impacts and mitigation measures are presented for the entire project, not just what might be seen from the Observer Viewpoints. Refinement of aesthetic design details, although not required to meet the intent of mitigation, will be developed in collaboration with representatives of each affected community. In addition, each permitting jurisdiction may require additional measures beyond what is identified in the final environmental document.

County of Santa Barbara

Comment 46 Montecito Community Plan View Corridors

Section 2.1.6 (Visual/Aesthetics) of the draft environmental document included seven Observer Viewpoints through Montecito, from the highway and from the surrounding community. The related analysis documents disclosed the type and extent of visual impacts to Montecito's scenic vistas, visual resources and community character. The draft environmental document acknowledged a high degree of viewer sensitivity through Montecito based in large part on review and understanding of Montecito Community Plan policies. Applicable visual policies are cited and included in the analysis, existing visual conditions are discussed, and the proposed project is thoroughly presented and disclosed in map form, text narrative, illustrations and simulations.

County of Santa Barbara

Comment 47 Toro Canyon Reference

Toro Canyon was added to the list of unincorporated communities in the affected environment of Section 2.1.6 in the final environmental document.

County of Santa Barbara

Comment 48 Santa Claus Lane

The existing visual setting in Section 2.1.6 of the final environmental document was updated to include the commercial development along Santa Claus Lane and the highway commercial projects at the eastern Padaro Lane/U.S. 101 Interchange.

County of Santa Barbara

Comment 49 View Corridor Overlay District

Although this section simply provides a brief overview of the project's physical environment, references to the View Corridor Overlay Districts have been included in the more detailed Landscape Assessment Unit sections. For more information please refer to Volume I of the final environmental document, Section 2.1.6 (Visual/Aesthetics) and Table 2.21.

County of Santa Barbara

Comment 50 Community Plan References

The Padaro Unit has been corrected in the final environmental document to reflect the wording contained in your comment.

County of Santa Barbara

Comment 51 Memorial Oaks

Caltrans convened a Memorial Oaks Focus Review Group to help identify important community values represented by the trees and to advise Caltrans, and the Project Development Team in general, on ways to minimize project impacts on the Memorial Oaks, and to potentially revive the commemorative

aspects of the Memorial Oaks. Participants met five times between April 7, 2009, and May 5, 2010, and assisted in the development of recommendations for the Project Development Team.

Recommendations made by the Memorial Oaks Focus Review Group that were adopted by the Project Development Team are included in the list of Avoidance, Minimization, and/or Mitigation Measures in Section 2.1.6 of both the draft and final environmental documents.

County of Santa Barbara

Comment 52 Additional Observer Viewpoints

The draft environmental document acknowledged a high degree of viewer sensitivity throughout the project's length based in large part on review and understanding of the applicable community visual policies. The high degree of sensitivity indicated in these local policies is included in the Federal Highway Administration visual assessment process, which resulted in a finding of increased visual impact in the Summerland, Montecito, Padaro, Carpinteria and Santa Barbara assessment units. Section 2.1.6 (Visual/Aesthetics) of the draft environmental document included 27 Observer Viewpoints both from on the highway and from the surrounding communities. Observer Viewpoints include the Padaro Lane overcrossing, six viewpoints throughout Summerland, and three viewpoints within the Ortega Hill area.

The draft environmental document considered the visual condition of the entire project and did not limit its findings or mitigation measures to only those specific views shown in the Observer Viewpoint locations. The total number of potential viewpoints associated with the project is infinite, and the Federal Highway Administration process recognizes that it is not possible to show every possible viewing scenario for a project. Applicable visual policies are cited and included in the analysis, existing visual conditions are discussed, and the proposed project is thoroughly presented and disclosed in map form,

text narrative, illustrations and simulations. The extent of potential impacts and mitigation measures are presented for the entire project, not just what might be seen from the Observer Viewpoints. All landscaping and aesthetic design details will be developed in collaboration with representatives of each affected community, in addition to a thorough review by the permitting jurisdiction.

County of Santa Barbara

Comment 53 Santa Claus Lane

Section 2.16 of the final environmental document was revised to include discussion of the beach at Santa Claus Lane, the Caltrans storage yard, and the potential effect of median planting through the area.

County of Santa Barbara

Comment 54 Padaro Lane Soundwall Views

Section 2.16 of the final environmental document was revised to include discussion of the views from Padaro Lane to the soundwall.

County of Santa Barbara

Comment 55 Santa Claus Lane Construction Impacts

A discussion was added to Section 2.1.6 of the final environmental document that includes the Caltrans storage area as an existing condition.

The Caltrans maintenance area along Santa Claus Lane is critical for Caltrans' ongoing obligation to operate and maintain Routes 101, 192, and 150 in Southern Santa Barbara County. There are few areas in this vicinity that Caltrans can use to meet the needs for periodic storage of materials and/or other maintenance-related functions. If the County or another entity can provide Caltrans with a comparable facility in terms of size, storage capacity, access, and permits for ongoing use, Caltrans is willing to relocate from this specific location. This facility is not related directly to the South Coast 101

HOV Lanes project and therefore is not associated with any mitigation measures for this project.

County of Santa Barbara

Comment 56 Avoidance, Minimization, and/or Mitigation Measures

The draft environmental document (and now the final environmental document) fully disclosed the potential impacts to existing landscaping through the project area (refer to Section 2.1.6). The analysis and photo-simulations appropriately show proposed landscaping, landscape removal, wall locations, wall aesthetics and other features based on Caltrans and Federal Highway Administration standards. The Visual/Aesthetics discussion found in the draft environmental document (Sections 2.1.6 and 2.5 as well as Chapter 3) analyzes and discloses specific impacts based on a reasonable worst-case scenario relative to vegetation removal and replanting. The list of mitigation measures are specifically related to these identified impacts. The draft environmental document also determined that these adverse impacts, although lessened through specific mitigation measures contained in the document, would not reduce the impacts to a less than significant level.

Mitigation measures are extensive and specifically address all new and modified structures, walls, barriers, railings, landscaping, lighting, signage and other listed features as it relates to scenic views and community character. Although not required in order to meet the intent of mitigation, refinement of aesthetic design details will be developed in collaboration with representatives of each affected community. Furthermore, each permitting jurisdiction may require additional measures beyond what is identified in the final environmental document.

For information regarding the stockpiles on Santa Claus Lane, refer to response to comment 55 above.

County of Santa Barbara

Comment 57 Cultural Resources

The Archaeological Site Report for the Via Real Redeposited Midden (CA-SBA-3943) was included in the Archaeological Survey Report for the South Coast 101 HOV Lanes project. The Archaeological Survey Report was Attachment B of the three-volume Historic Property Survey Report (HPSR) prepared for the project and submitted to the State Historic Preservation Officer on November 4, 2010. A copy of the entire three-volume HPSR, including the Archaeological Survey Report and the site report for CA-SB-3943 (Attachment B of the HPSR), the Supplemental Archaeological Survey Report (Attachment C of the HPSR), and the Extended Phase I Archaeological Investigations report (Attachment E of the HPSR), was provided to the Santa Barbara County Planning and Development Historical Landmarks Advisory Commission on March 3, 2011. For your convenience, an additional copy of the HPSR and all of its attachments was sent to the Santa Barbara County Planning and Development Department on October 15, 2012.

County of Santa Barbara

Comment 58 Memorial Oaks

Although Table 13 of the December 2004 Toro Canyon Plan refers to the freeway segment between Nidever Road and Toro Canyon Road as “Eligible as a County Place of Historic Merit,” neither the highway segment nor the Memorial Oaks have been so designated by the Santa Barbara County Planning and Development Historical Landmarks Advisory Commission, which is charged with evaluating “structures of historical significance in the Toro Canyon area” (Action HA-TC-2.1).

The draft environmental document stated the following in Section 2.1.6 (p. 114) and Chapter 4: “As part of gathering information about historic-period resources in the project Area of Potential Effects, Caltrans formed a Memorial Oaks Focus Review group to learn community opinions and hear community

concerns about the oak trees. Caltrans recognized that, although the Memorial Oaks are not officially designated as a local historical resource, the trees are mentioned in the *101 in Motion* Final Report (2006) and the Toro Canyon Plan (Santa Barbara County 2004), and they continue to be of local interest and will be directly affected by the project.”

The draft environmental document further states, on page 114, that the Memorial Oaks Focus Group met five times between April 7, 2009, and May 5, 2010, and included six citizen members, an appointed representative from the Santa Barbara County Historic Landmarks Advisory Commission, and staff from Santa Barbara County Planning, among others. During the course of these meetings, the Caltrans consultants who evaluated the Memorial Oaks presented the results of their studies and their conclusion that, given that the trees in their present setting lack sufficient integrity to be able to convey their significance as a World War I memorial, they are not eligible for listing in the National Register of Historic Places and do not constitute historical resources for the purposes of the California Environmental Quality Act.

In making the determination that the Memorial Oaks are not historical resources, Caltrans duly considered that, under the California Environmental Quality Act, resources locally designated may constitute historical resources for the purposes of the act. The California Environmental Quality Act guidance, however, states that “resources which are listed in a local historic register or deemed significant in a historical resource survey as provided under Section 5024.1(g) are to be presumed historically or culturally significant unless ‘the preponderance of evidence’ demonstrates they are not. The next step is to consult the pertinent existing local register and survey. Because a local register or survey may not employ the same criteria as the California Register, listing or identification in a local survey does not necessarily establish if the property is eligible for listing on the Register. The Lead Agency will need to evaluate the resource in light of the Register’s listing

criteria. . . . The Lead Agency may determine that the preponderance of evidence demonstrates that the property in question is not historically or culturally significant despite being listed on a local register or identified in a local historic survey. When making this determination, OPR [the California Office of Planning and Research] strongly recommends that the agency cite for the record the specific, concrete evidence which supports that determination.” Caltrans provided this specific, concrete evidence in its evaluation of the resource, as documented in the Historical Resources Evaluation Report prepared for the proposed South Coast 101 HOV Lanes project (Attachment H of the HPSR). The State Historic Preservation Officer concurred with Caltrans’ eligibility determinations on January 26, 2011.

Because it has been demonstrated that the Memorial Oaks are not historical resources, project impacts to the Memorial Oaks have been appropriately addressed in the Visual and Aesthetic section of the draft environmental document.

County of Santa Barbara

Comment 59 Local Historical Significance

To meet its responsibilities under Section 106 of the National Historic Preservation Act, Caltrans conducts archaeological and built-environment (architectural) studies in accordance with the January 2004 Programmatic Agreement Among the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer and the California Department of Transportation Regarding Compliance with Section 106 of the National Historic Preservation Act, As It Pertains to the Administration of the Federal-Aid Highway Program in California. To meet its responsibilities under the California Environmental Quality Act, Caltrans conducts its archaeological and built-environment (architectural) studies in accordance with Section 15064.5(a)(2)-(3) of the California Environmental

Quality Act , using the criteria outlined in Section 5024.1 of the California Public Resources Code.

In evaluating a specific built-environment property, Caltrans will consider whether the property meets any of the criteria (Criterion A, B, C, or D) for eligibility to the National Register of Historic Places. If a property is determined to be eligible, Caltrans will determine whether it is eligible at the local, state, or national level, depending on the geographical range of the importance of a property and its associations. In this context, properties determined significant at the local level are those that meet National Register criteria, not those that meet local criteria. Caltrans does not evaluate properties for their eligibility to local listings of any kind, although if properties are locally listed this information will be noted in the Historical Resources Evaluation Report and in the Historic Property Survey Report. In some instances, resources that have been listed under local criteria are determined by Caltrans to be historic resources for the purposes of the California Environmental Quality Act if they would, in Caltrans' opinion (as Lead Agency under CEQA), meet the criteria for listing in the California Register of Historical Resources. The Summerland World War I Monument, designated Santa Barbara County Landmark No. 35, is a case in point. Although Caltrans determined, and the State Historic Preservation Officer concurred, that the monument is not eligible for the National Register, its status as an officially designated County landmark was considered in regarding it as a historical resource for the purposes of the California Environmental Quality Act.

For the purposes of determining project impacts on historic properties within the area of potential effects, only those resources either listed in or eligible for listing in the National Register of Historic Places or those resources considered historical resources for the purposes of the California Environmental Quality Act are included in the analysis.

The draft environmental document, on page 225, documents that the project would cause direct adverse effects to the Via Real Redeposited Midden, but would not have any direct or indirect effects on the National Register-eligible built-environment resources (which include the Ortega-Masini Adobe, Santa Barbara County Landmark No. 31) or on the Summerland World War I Monument (Santa Barbara County Landmark No. 35), which is not a National Register-eligible built-environment resource but is a historical resource for the purposes of the California Environmental Quality Act.

County of Santa Barbara

Comment 60 Area of Potential Effects Buffer

The 2008 Historic Property Survey Report (Kirkish, 2008) to which you refer was prepared by Department of Transportation District 7 in connection with a different project (the 6-mile Ventura/Santa Barbara Highway 101 HOV Widening project, located between the Mobil Pier in Ventura County and Carpinteria Creek in Santa Barbara County). The description of the area of potential effects given in the Historic Property Survey Report (Joslin, 2010) prepared by Department of Transportation District 5 in connection with the proposed South Coast 101 HOV Lanes project is, in fact, consistent with the description of the area of potential effects appearing in the draft environmental document. As stated on page 215 of the draft environmental document, the width of the area of potential effects varies between about 170 and 385 feet, except for a maximum of about 570 and 670 feet at Sheffield Drive and Cabrillo Boulevard, respectively. The vertical area of potential effects varies between the existing ground surface and a depth of 30 feet where structures will be replaced.

County of Santa Barbara

Comment 61 Historic Properties in the Architectural Area of Potential Effects

The Historical Resources Evaluation Report (HRER) is the appropriate technical study for documenting the historical resources located within the project area of potential effects. The State Historic Preservation Officer has concurred with the sufficiency of Caltrans' efforts to identify historic properties located within the area of potential effects and has also concurred that the only historic property that has the potential to be affected by the project is a prehistoric site, the Via Real Redeposited Midden. The location of archaeological sites is confidential and may not be mapped or divulged in an environmental document. Caltrans discusses historic properties in the draft and final environmental documents but does not see any utility in including maps of resources that will not be affected by the project in the environmental document. The HRER contains mapping of the historic properties and is available upon request.

County of Santa Barbara

Comment 62 County Comprehensive Plan and Cultural Resources

As documented in Section 2.1.7 (Cultural Resources) of the draft environmental document on pages 216-217, elements of the Via Real Redeposited Midden were moved onsite from their original location in connection with an early highway project. Recent design revisions were able to shift the preferred alternative (Alternative 1) toward the median in an effort to minimize potential impacts to the site. Comprehensive studies conducted by Caltrans suggest that the National Register-eligible portion of the site is not only located below the level of proposed U.S. 101 construction but is also located outside the State right-of-way—and therefore outside the Area of Direct Impact. An Environmentally Sensitive Area (ESA) and exclusionary fencing will be established and enforced around the known site limits. Although we do not anticipate that there will be any impacts to the

redeposited midden, or that significant portions of the site extend into the State right-of-way, or that any other significant archaeological resources are present, Caltrans has deemed it prudent to consider the remote possibility that discoveries during construction may still occur.

As a result, Caltrans is acting in conformity with both Santa Barbara County Comprehensive Plan Land Use Element Historical and Archaeological Sites Policy 3 and Coastal Land Use Policy 10-3: "When sufficient planning flexibility does not permit avoiding construction on archaeological or other types of cultural sites, adequate mitigation shall be required. Mitigation shall be designed in accord with guidelines of the State Office of Historic Preservation and the State of California Native American Heritage Commission."

Caltrans takes its stewardship of Native American resources seriously and has continued to consult with local Chumash individuals and groups since the inception of this project. Caltrans' approach is therefore in conformity with both Santa Barbara County Comprehensive Plan Land Use Element Historical and Archaeological Sites Policy 5 and Coastal Land Use Policy 10-5: "Native Americans shall be consulted when development proposals are submitted which impact significant archaeological or cultural sites."

Specifically, Caltrans has consulted with the State Historic Preservation Officer and local Chumash representatives identified by the Native American Heritage Commission to develop a systematic approach to addressing not only any adverse effects to the Via Real Redeposited Midden but also effects to any similar as yet unidentified archaeological resources discovered during construction, in the unlikely event that such discoveries are made. Adverse effects to this property were initially proposed to be resolved by a Memorandum of Agreement prepared in consultation with the State Historic Preservation Officer and the Chumash representatives. As part of our ongoing consultation, however, the resolution document was restructured. Adverse

effects will now be resolved in conformity with the June 20, 2013 *Programmatic Agreement between the California Department of Transportation and the California State Historic Preservation Officer Regarding the South Coast 101 HOV Lanes Project, U.S. Route 101, Santa Barbara County, California*. Both the Programmatic Agreement and its appended Treatment and Data Recovery Plan are included in Appendix D of this final environmental document, *State Historic Preservation Officer Correspondence*.

County of Santa Barbara

Comment 63 Data Recovery Plan

As explained in Section 2.1.7 of the final environmental document, the signed Programmatic Agreement and the Treatment and Data Recovery Plan, developed by Caltrans in consultation with the State Historic Preservation Officer and the local Chumash community, is an advance plan that allows Caltrans to proceed on a pre-approved course of action, providing direction for any contingency involving buried archaeological resources encountered during construction. It includes a decision matrix to accommodate the appropriate handling of discoveries during construction, in the unlikely event that such discoveries occur.

Both the Programmatic Agreement and its appended Treatment and Data Recovery Plan are included in Appendix D, State Historic Preservation Officer Correspondence, of this final environmental document. Also, refer to the above response to the County's comment 62.

County of Santa Barbara

Comment 64 Hydrology and Floodplain – Toro Community Plan

Additional information was added to Section 2.2.1 of the final environmental document. Additional runoff created by the project will be retained or detained where possible given the physical constraints in the project limits. The project goal is to match pre-construction runoff rates. Caltrans will

coordinate with the County when developing the final drainage design to avoid exacerbating existing drainage problems in the Toro Canyon Planning Area.

County of Santa Barbara

Comment 65 Bluff Development

All work will be confined to the Caltrans right-of-way. Fencing to protect environmentally sensitive areas will be installed around sensitive habitats. Measures will be included to avoid impacts, and a landscaping plan will be prepared. A landscaping and grading plan will be submitted during the Coastal Development Permit process. Temporary impacts to water quality from increased erosion on new cut and fill slopes will be avoided by implementing best management practices (BMPs) from Caltrans' National Pollution Discharge Elimination System statewide permit. Caltrans will use erosion control methods, which include hydroseeding of disturbed areas with native seed where practicable to benefit water quality by decreasing runoff and sedimentation into waterways.

County of Santa Barbara

Comment 66 Arroyo Paredon Creek

The proposed work at the Arroyo Paredon Creek Bridge has changed since the draft environmental document was released as a result of recent correspondence with the Santa Barbara County Flood Control District. The agency provided documentation discussing flooding concerns on Arroyo Paredon downstream of U.S. 101. The updated description of the Arroyo Paredon Creek Bridge was added to Sections 2.2.1 (Hydrology and Floodplain) and 2.3.4 (Threatened and Endangered Species) of the final environmental document.

County of Santa Barbara

Comment 67 Soundwalls and Montecito Creek

Your comment appears to relate to discussions regarding both Montecito Creek and the bridges at Romero, San Ysidro, and Oak creeks. As for flow escaping from Montecito Creek, the amount of flow escaping the main channel upstream of U.S. 101 would be approximately 2,500 cubic feet per second (cfs) during the 100-year flow of 5,700 cfs (estimated by FEMA). Relative to passing flood flows through the soundwalls in the floodplains for Romero, San Ysidro, Oak and Montecito creeks, where flood flows are high, they would be passed through the soundwalls with floodgates similar to those near Salinas Street in Santa Barbara. Where flows are shallow, they would pass through smaller openings. Details of the openings will be developed in coordination with the Santa Barbara County Flood Control District during final design of the project. Approval from the flood control district and FEMA will be obtained for all work that could impact floodplains.

County of Santa Barbara

Comment 68 Drainage Design

Floodgates or low-flow openings will be added to soundwalls in floodplains to minimize impacts. Several changes were made to the hydraulic section as a result of additional soundwalls being considered for the project. This includes a portion of a wall that was reconsidered for feasibility after there was a revision made to the floodway at Romero Creek (per a revision to the FEMA Flood Insurance Rate Map on December 4, 2012). Therefore, the following measures have been added to Section 2.2.1 of the final environmental document to minimize impacts to flooding:

- A newly proposed soundwall within the limits of the floodplain at Cravens Lane would be staggered to convey flood flows.
- The newly extended portion of the wall in the vicinity of the floodway at Romero Creek (based on recently revised floodway limit) would

incorporate floodgates to convey flood flows and would not raise base flood elevations.

- The extended portions of the soundwalls located between the frontage road and U.S. 101 at Montecito Creek encroach into the floodplain. However, the walls would be designed to pass flood flows and not raise base flood elevations.

County of Santa Barbara

Comment 69 Arroyo Paredon Creek and Flooding

The discussion on page 242 of the draft environmental document pertains to water quality issues and mentions flooding only as background. The floodplain section of the draft environmental document is intended to demonstrate compliance with 23 Code of Federal Regulation 650 Subpart A, which pertains to only the FEMA 100-year floodplain. The FEMA FIRM doesn't show 100-year flooding where Arroyo Paredon Creek discharges to the ocean. It does show a Zone X on the east side of the creek between the ocean and the railroad, indicating either 500-year or shallow flooding. Shallow flooding and 500-year flooding aren't regulatory issues and consequently aren't addressed in the document.

County of Santa Barbara

Comment 70 Geology/Soils/Seismic/Topography – Retaining Walls

The final environmental document has been modified to include additional information for the two proposed retaining walls along the bluff at the Sheffield Interchange. Refer to Section 1.3.1 in the final environmental document for the updated design of the Sheffield Interchange that includes eliminating the other retaining walls.

County of Santa Barbara

Comment 71 Geology/Soils/Seismic/Topography

A site-specific geotechnical report prepared by a registered or certified geologist will be provided during the design phase of the project. This report will provide documentation that attests to the stability of the proposed improvements, including any implications to bluff retreat. Recommendations in that report will be implemented in the grading and drainage plans that will be submitted during the Coastal Development Permit process.

County of Santa Barbara

Comment 72 Coastal Bluff

Detailed grading and drainage plans along with landscaping irrigation plans will be developed consistent with County coastal development regulations for the top of the bluff area near Ortega Hill. These plans will be submitted with the Coastal Development Permit application. Currently, all freeway drainage in this area is captured within the existing freeway drainage system. That system is expected to be continued for use and modified if necessary to accommodate all additional runoff generated from the freeway improvements in the bluff top area. Landscaping in this area will be developed with a focus on minimal irrigation to reduce unintentional runoff. Guidance from the geotechnical report mentioned in response to comment 71 will be critical to determining final design information for the Sheffield Interchange to be consistent with the policies specified in your comment.

County of Santa Barbara

Comment 73 Hazardous Waste

As indicated in Section 2.2.5 (Hazardous Waste or Materials), if the aerially deposited lead-contaminated soil is reused, it would be in accordance with the terms of the Department of Toxic Substances Control Variance. Typically, aerially deposited lead-contaminated material is disposed of at a Class 1 landfill. To further address your comment, the following wording was added

to Section 2.2.5 to explain possible uses of the soil: The aerially deposited lead contaminated soil may be used in the construction of new on-ramps and off-ramps or for the widening of fill sections.

County of Santa Barbara

Comment 74 Hazardous Waste - Oil Wells

Per your comment, the following minimization measure consistent with Policy HAZ-S-1 was added to Section 2.2.5 (Hazardous Waste or Materials): If any abandoned oil wells are discovered, State Department of Conservation Division of Oil and Gas abandonment removal procedures shall be followed.

County of Santa Barbara

Comment 75 Hazardous Waste – Former Iron Horse Gas Station

The tank at the former Iron Horse gasoline service station was removed in September 2012 and is no longer an issue. The tank removal was completed separate from the proposed project. In response to this action, Section 2.2.5 (Hazardous Wastes) was updated in the final environmental document.

County of Santa Barbara

Comment 76 Hazardous Waste – Asbestos Mitigation

The following sentence was added to the Avoidance, Minimization, and/or Mitigation Measures section of Section 2.2.5 and Appendix F of the final environmental document: The asbestos removal would be conducted in accordance with all applicable laws and regulations.

County of Santa Barbara

Comment 77 Air Quality

This correction was made to the paragraph in Section 2.2.6 (Air Quality) of the final environmental document to include the Sheffield Drive interchange as part of the project.

County of Santa Barbara

Comment 78 Air Quality - Pedestrian/Bike Trails

As stated in the response to comment 1 of the County's comments, the two pedestrian/bicycle trails your comment refers to are being considered by the Santa Barbara County Association of Governments. It should be noted however, that the work proposed for these trails is separate from the South Coast 101 HOV Lanes project.

County of Santa Barbara

Comment 79 Short-term Construction Noise Impacts

Construction noise impacts are currently addressed in Volume I, Section 2.4. Caltrans follows the Federal Highway Administration Noise Standards and the Caltrans Noise Protocol to minimize noise levels during construction. Caltrans understands that local standards may differ from state and federal standards and tries to abide by them when possible. However, as a state agency, Caltrans is obligated to maintain consistency in applying state and federal standards equally across the state. When there is an inconsistency between state and local standards, state standards must be followed.

A measure was added to Section 2.4 of the final environmental document to minimize construction activities in areas adjacent to residential areas during evening, nighttime, weekend, and holiday periods where possible.

County of Santa Barbara

Comment 80 Noise

As indicated in Section 3.2 of the draft environmental document, when determining whether a noise impact is significant under the California Environmental Quality Act, a comparison is made between the baseline noise level and the build noise level. The California Environmental Quality Act noise analysis is completely independent of the National Environmental Policy Act analysis discussed in Section 2.2.7, which focuses on noise abatement criteria.

Under the California Environmental Quality Act evaluation of an impact is based on context and intensity. The noise assessment entails establishing the existing noise environment and then determining how large or perceptible project-related noise increases would be in the given area. As a result of the small increases in noise levels, the California Environmental Quality Act determination concludes that the noise impacts associated with the proposed build alternatives are less than significant and do not require mitigation. Noise abatement such as soundwalls is not considered mitigation by the Federal Highway Administration. It should be noted that four responses categorized under noise in the CEQA checklist (see Volume II, Appendix A, XII. Noise) were mistakenly identified as “significant impact without mitigation.” However, this error has been corrected along with an explanation within the CEQA checklist. The responses XII (a-d) now reflect “less than significant.”

Noise measurements are presented in Table 2.3.2 of the environmental document. The proposed build alternatives would in general increase noise levels by around 3-decibels by 2040. Noise increases under 3 decibels are considered barely audible to the human ear. However, because existing noise volumes are already high in certain areas, soundwalls are recommended in a variety of locations to abate highway traffic noise levels based on Caltrans protocol. The protocol allows for affected residences to vote for or against the construction of soundwalls. Currently, a total of 28 soundwalls are recommended, but soundwall voting has not yet occurred. The voting is scheduled to take place during the project's design phase. Recommended soundwalls may not all be approved by the affected residents. In addition, the proposed walls will be evaluated during the Coastal Development Permit process for each jurisdiction. Evaluations will consider potential visual concerns associated with any of the recommended soundwalls.

County of Santa Barbara

Comment 81 Noise

Noise abatement is not considered reasonable for commercial establishments as set forth in both the Federal Highway Administration and Caltrans noise protocol.

County of Santa Barbara

Comment 82 Noise

Second-story residential units are analyzed only when outdoor noise levels are measured on second levels such as above a garage or the land topography exposes the second story to additional traffic noise. Second-story levels are not used as receivers because exterior uses are negligible and the additional cost of attenuation is high. The public meeting room, if built, would constitute future development and receptors R52 and R53 would be the closest receptors to that proposed meeting room location. The Noise Study Report indicates that R52 was measured at a higher outdoor noise level of 74 decibels, which also approximates the outdoor noise level for the prospective location of the public meeting room. With properly closed insulated windows, the outdoor/indoor noise level difference of 25 decibels yields a 47-decibel interior noise level for the public meeting room, which is below the Nuisance Abatement Criteria for interior noise levels.

The Summerland Church was included in both the Noise Study Report and the draft environmental document. Both reports documented that the church was affected by noise and recommended that a soundwall be considered (Soundwall S392). However, due to severe visual impacts that would occur as a result of blocking prime ocean views, the wall was not recommended for construction by the Project Development Team. Furthermore, It should be noted that because Soundwall S392 and Soundwall S414 were both dropped for significant visual concerns (blocking prime ocean views), the remaining

portions of both soundwalls (not blocking prime views) were not found to be financially reasonable and therefore not recommended for construction.

County of Santa Barbara

Comment 83 Noise

Under the Caltrans noise protocol, unusual and extraordinary abatement considerations are given to receptors affected by extraordinary noise levels such as 75 decibels or noise levels with an increase of 30 decibels over the existing noise levels. Furthermore, interior noise levels are considered for places where noise is not allowed, such as schools and libraries. Under the Caltrans noise protocol, interior noise levels would need to fall below 52 decibels, not the 45 decibels level stipulated in the Summerland Community Plan Noise Policy.

County of Santa Barbara

Comment 84 Biology - Wildlife Corridors

Volume I, Section 2.3.3 of the final environmental document was updated to include that several creeks in the project area are used by urban wildlife, including raccoons, skunks, tree frogs and various fish species, as well as introduced species such as feral cats and red-eared slider turtles. Proposed new bridges will not affect the function of these creeks as movement corridors for local wildlife. California, along with other states and nations, is becoming more aware of the importance of connected habitats to ensure the persistence of wildlife and biodiversity. In 2009, Caltrans and the Department of Fish and Wildlife sponsored the creation of a statewide wildlife habitat connectivity map as part of the California Essential Habitat Connectivity Project to identify high-priority wildlife corridors and landscape linkages for use in transportation planning. This project does not occur within a linear linkage or least-cost corridor modeled by the Essential Habitat Connectivity Database (2011). The nearest identified landscape linkage begins 4 miles

north of the project limits in the Sulfur Mountain-Sierra Madre Mountains Essential Connectivity Area.

County of Santa Barbara

Comment 85 Biology - Natural Communities

The currently proposed planting ratio of 3:1 is consistent with what Caltrans typically plants for these situations and is considered to be adequate to meet the needs of this project. Caltrans acknowledges that during the subsequent Coastal Development Permit process, higher ratios may be requested by the permitting agency.

County of Santa Barbara

Comment 86 Biology - Animal Species

An expanded discussion of raptor nest surveys methodology has been included in Section 2.3.3 of the final environmental document as follows: Raptor nests are often used from year to year, and remain as established structures. Focused surveys for raptor nests were conducted in January and February 2010 prior to the leafing out of trees to ensure maximum visibility. Several raptor species found in the study area exhibit courtship and nesting behavior in late January or early February, so the biological study area was also surveyed for raptor presence and for courting or pair bonding behavior at this time. No raptors were seen using the highway corridor in the biological study area. At additional site visits during the nesting season (April and May) in 2009 and 2010, the biological study area was reviewed for raptor presence and nesting behavior and none was observed.

County of Santa Barbara

Comment 87 Biology - Animal Species

Based on your comment, the following information was added to Section 2.3.3 (Animal Species) of the final environmental document: Based on records from local community plans for Montecito, Summerland and Toro Canyon,

eight mapped butterfly roosts occur within ¼-mile of the project area: Music Academy of the West in Santa Barbara; Butterfly Lane and High Road in Montecito; Crane Country Day School in Montecito; Ortega Hill in Montecito; Via Real and Padaro Road in Summerland; Lambert Road in Summerland; and two locations along Padaro Road in Toro Canyon. Three Environmentally Sensitive Habitat sites for the monarch butterfly occur within 200 feet of the work limits; one at Ortega Hill between U.S. 101, Sheffield Drive and Ortega Hill Road, and two along Padaro Lane, outside the western boundary of the biological study area. No roost locations were observed within the project limits. No work is planned within 50 feet of Environmentally Sensitive Habitat for monarch butterflies. This project is not expected to affect monarch butterfly roosting sites.

County of Santa Barbara

Comment 88 Wetlands and Other Waters

Section 2.3.2 was updated in the final environmental document as follows: The California Department of Fish and Wildlife and the California Coastal Commission use a one-parameter wetland definition, which requires evidence of only a single parameter (e.g., hydrology, hydric soils, or hydrophytic vegetation) to establish wetland conditions.

County of Santa Barbara

Comment 89 Wetlands

As indicated in your comment, the wetland mapping referenced in the comment is found in the Natural Environment Study; this study along with the other technical studies was made available to the public upon request, placed in the libraries, and viewable on the internet alongside the Draft Environmental Impact Report/Environmental Assessment. The decision was made not to include the mapping in the environmental document due to its size and the fact that the Natural Environment Study and associated wetland mapping could easily be requested or found for the project on the Caltrans

District 5 or SBCAG websites. A notation has been added to explain the map's availability.

County of Santa Barbara

Comment 90 Wetland Mitigation

Caltrans assumes that less than a 3:1 replacement ratio would not be acceptable to the City of Carpinteria, County of Santa Barbara and the Coastal Commission based on coordination relative to the required Local Coastal Plan Amendments. The compensation ratio required for impacts is based on resource agency recommendations as well as the function and quality of wetland habitat that needs to be replaced. It should be noted that the coastal wetlands to be affected by the project are low quality wetlands that are constructed roadside drainage ditches next to U.S. 101.

County of Santa Barbara

Comment 91 Construction Impacts

- a) The draft environmental document contained a discussion of the visual impacts associated with construction, but the text was located on page 210 in Section 2.1.6. To be more consistent and respond to your concern, this discussion has been moved to Section 2.4 of the final environmental document.
- b) In terms of construction impacts to Traffic and Transportation/ Pedestrian and Bike Facilities, there was a sentence added to Section 2.1.5 of the final environmental document to clarify potential temporary shifts of vehicle traffic onto local streets during construction.
- c) Caltrans plans to work closely with County Public Works regarding the construction traffic management plan for neighborhood streets surrounding the Sheffield Drive Interchange. At the design stage of the project, Caltrans would evaluate local streets to determine to what extent

repair or repaving is required to ensure that the project meets Americans with Disabilities Act requirements.

County of Santa Barbara

Comment 92 Cumulative Impacts

The Cumulative Impacts section (Section 2.5) was updated to include an evaluation of potential cumulative impacts for the following resources in addition to the evaluation of Visual/Aesthetics resources that was in the draft environmental document: Traffic and Transportation/Pedestrian and Bicycle Facilities; Water Quality and Stormwater Runoff; and Biological Resources (Wetlands and Threatened and Endangered Species).

County of Santa Barbara

Comment 93 Visual/Aesthetics Cumulative Impact Analysis

The draft environmental document does not specifically mention visibility of Santa Claus Lane in the Cumulative Impacts analysis. Santa Claus Lane is considered a part of the overall visual character in conjunction with all of the other development along frontage roads and throughout the adjacent communities of this 10-mile-long project corridor.

County of Santa Barbara

Comment 94 Cumulative Impacts

The project has been added to the list of projects considered for Cumulative Impacts in Section 2.5.

County of Santa Barbara

Comment 95 Cumulative Impacts - Noise

As stated in Section 3.2, the project generally does not increase noise levels greater than 3-decibels over the no-build condition in 2040. There are currently high noise levels along the U.S. 101 corridor and the noise situation has been that way for many years. To reduce noise levels, Caltrans is also

proposing the use of noise-attenuating pavement surfacing on the main travel lanes along U.S. 101 where the HOV lane is proposed. In regard to following local noise standards, Caltrans follows state and federal standards and recognizes that local standards may differ from state and federal standards. Caltrans maintains consistency in applying state and federal standards equally across the state. When there is an inconsistency between state and local standards, state standards must be followed.

A Soundwall Process information sheet has been added to the final environmental document (see Appendix K) that explains the soundwall approval process that must occur. The process includes voting by property owners of affected residences along with the caveat that the soundwalls must also be approved as part of the Coastal Development Permit process.

County of Santa Barbara

Comment 96 Significant Impacts -Cultural Resources

As documented in Section 2.1.7 of the draft environmental document on pages 216-217, elements of the Via Real Redeposited Midden were moved onsite from their original location in connection with an early highway project. Recent design revisions were able to shift the preferred alternative (Alternative 1) toward the median in an effort to minimize potential impacts to the site. Comprehensive studies conducted by Caltrans suggest that the National Register-eligible portion of the site is not only located below the level of proposed U.S. 101 construction but is also located outside the State right-of-way—and therefore outside the Area of Direct Impact. An Environmentally Sensitive Area (ESA) and exclusionary fencing will be established and enforced around the known site limits. Although we do not anticipate that there will be any impacts to the redeposited midden, or that significant portions of the site extend into the State right-of-way, or that any other significant archaeological resources are present, Caltrans has deemed it prudent to consider the remote possibility that discoveries during construction may still occur.

Caltrans has consulted with the State Historic Preservation Officer and local Chumash representatives identified by the Native American Heritage Commission to develop a systematic approach to addressing not only any adverse effects to the Via Real Redeposited Midden but also effects to any similar as yet unidentified archaeological resources discovered during construction, in the unlikely event that such discoveries are made. Adverse effects to this property were initially proposed to be resolved by a Memorandum of Agreement prepared in consultation with the State Historic Preservation Officer and the Chumash representatives. As part of our ongoing consultation, however, the resolution document was restructured. Adverse effects will now be resolved in conformity with the June 20, 2013 Programmatic Agreement between the California Department of Transportation and the California State Historic Preservation Officer Regarding the South Coast 101 HOV Lanes Project, U.S. Route 101, Santa Barbara County, California. Both the Programmatic Agreement and its appended Treatment and Data Recovery Plan are included in Appendix D, State Historic Preservation Officer Correspondence, of this final environmental document.

The Summerland World War I Monument, designated Santa Barbara County Landmark No. 35 in 1994, is a historic resource for the purposes of the California Environmental Quality Act. In 1991, while it was still at its original location on Wallace Avenue, south of Highway 101, it was determined to be ineligible for listing in the National Register of Historic Places; the State Historic Preservation Officer concurred in this finding. Moving the monument in 1998 to its current location on Lillie Avenue appears to have impaired the structural integrity of the concrete pedestal. A photograph taken during the installation clearly shows that the pedestal was already cracked. The re-installation of the flagpole on top of the pedestal appears to have worsened the concrete cracking, probably due to the downward transference of wind-induced movement of the flag to the flagpole, and from the flagpole to the

pedestal. Caltrans will be using alternate construction methods in the vicinity of the Monument to avoid impacts from vibration. There is no potential for significant impacts to the historical resource due to the proposed South Coast 101 HOV Lanes project, and no mitigation measures are warranted. It is, therefore, within the purview of the County to repair the pre-existing damage to the Summerland World War I Monument.

County of Santa Barbara

Comment 97 Significant Impacts - Biological Resources

In response to your comment, the information in Section 3.2.2 of the final environmental document has been updated to reflect the County's concerns that this section did not clearly state that the project is inconsistent with the wetland protection policies that are part of the local coastal plans for both Santa Barbara County and the City of Carpinteria. In addition, a brief discussion of mitigation measures to be implemented was added and a reference made to Appendix F where all of the avoidance, minimization and mitigation measures are provided.

County of Santa Barbara

Comment 98 Unavoidable Significant Impacts

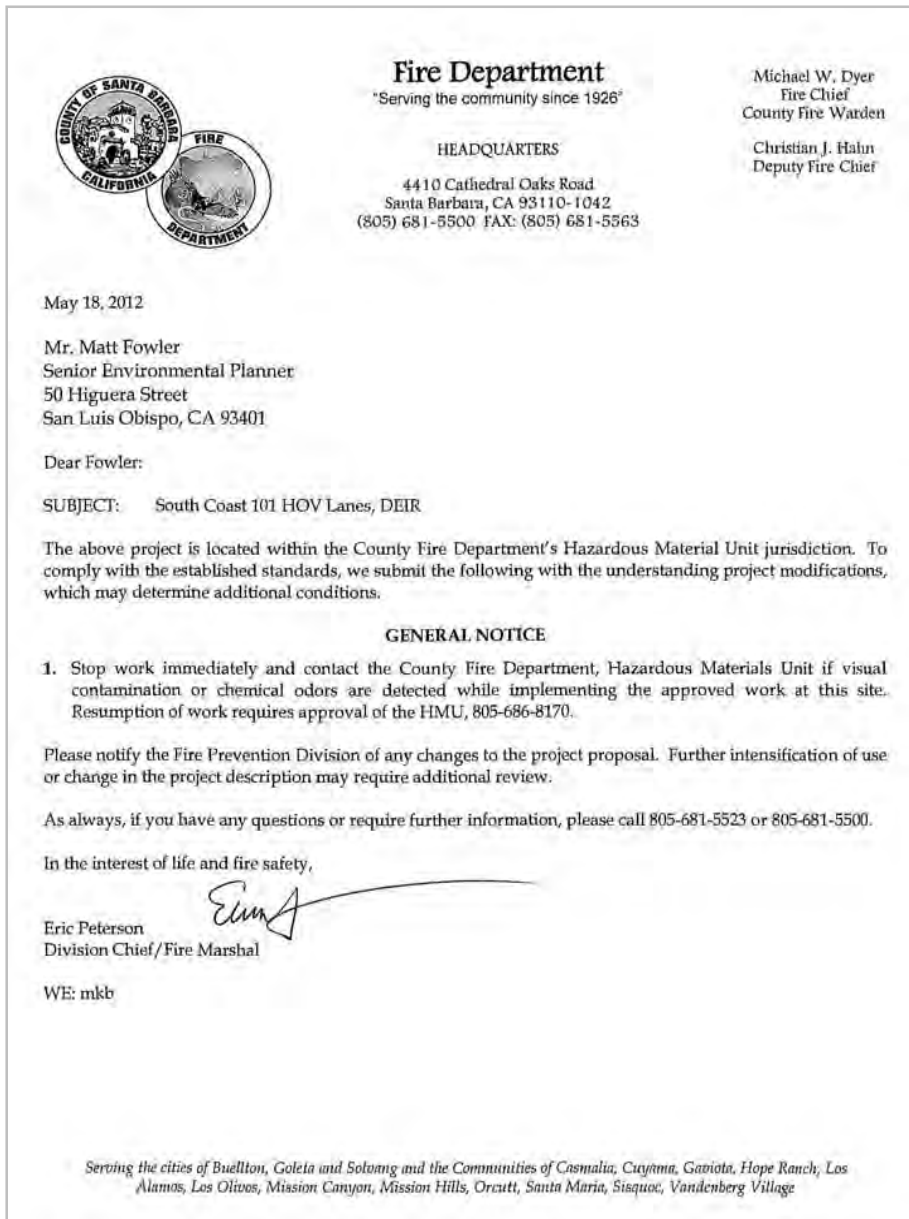
See response to comment 95 from the County of Santa Barbara.

County of Santa Barbara

Comment 99 Cumulative Impacts

Separate from the South Coast 101 HOV Lanes project is a coordinated effort led by the Santa Barbara County Association of Governments (the applicant) and City of Carpinteria to build two trails deemed necessary as part of the local coastal amendment process—the Santa Claus Lane Class I Bike Path is linked with the South Coast 101 HOV Lanes project and the Rincon Coastal Trail is linked with the Linden Avenue and Casitas Interchange project. This information was updated in Section 2.1.5 of the final environmental

document. Each of these paths would fill critical gaps in the overall trail system. The combination of the two trails, the proposed project, and the remaining elements of *101 in Motion* would move Santa Barbara County closer to meeting the goals necessary to decrease the overall production of greenhouse gas emissions.



Santa Barbara County Fire Department

Comment 1 Hazardous Material—Advisory

This is a Caltrans standard operating procedure and will be followed.



May 16, 2012

Matt Fowler
Senior Environmental Planner
California Department of Transportation District 5
50 Higuera Street
San Luis Obispo, CA 93401

Re: **APCD Comments on the Draft Environmental Impact Report South Coast 101 HOV Lanes Project, 05-SB-101_PM 1.4 to 12.3, 05-ON700, Project ID# 0500000225, SCH# 2009051018**

Dear Mr. Fowler:

The Air Pollution Control District (APCD) has reviewed Draft Environmental Impact Report (EIR) for the referenced project, which consists of a Caltrans proposal to modify U.S. 101 in order to provide a part-time, continuous access high occupancy vehicle (HOV) lane in each direction on U.S. 101 extending from Carpinteria Creek in the City of Carpinteria to Cabrillo Boulevard in the City of Santa Barbara. The project begins 0.22 mile south of the Baillard Avenue overcrossing (post mile 1.4) in the City of Carpinteria and extends to the southern portion of the City of Santa Barbara (post mile 12.3) near Sycamore Creek. Three build alternatives and a No-Build Alternative are being considered for this project. Each build alternative would add a single HOV lane in both the northbound and southbound directions and rebuild interchanges at Sheffield Drive and Cabrillo Boulevard. The HOV lanes would be reserved for vehicles containing two or more people during morning and afternoon peak hours of operation each weekday. Outside of the specified hours, the HOV lanes would be open to any vehicles.

Air Pollution Control District staff offers the following comments on the Draft EIR:

1. **Inconsistent Terminology for Vehicle Idling Restriction:** There is inconsistency in the language used for the idling restriction listed under the "Ozone Precursor (nitrous oxides and reactive organic compounds) Measures" that appears in various locations in the document. On page 286 the bulleted item reads, "Idling of heavy-duty diesel trucks during loading and unloading **must** (emphasis added) be limited to five minutes; auxiliary power units would be used whenever possible." However, on page 413 the bolded term appears as "should", page 444 uses "should", and page F-25 uses the term "shall". We recommend revising the document to use consistent language and employing either the "must" or "shall" term since the idling restriction is a state requirement under Title 13 Section 2485 of the California Code of Regulations.

Air Pollution Control District staff has identified the following regulatory requirements that will apply to the project:

1. APCD Rule 345, *Control of Fugitive Dust from Construction and Demolition Activities* establishes limits on the generation of visible fugitive dust emissions at demolition and construction sites. The rule includes measures for minimizing fugitive dust from on-site activities and from trucks moving on- and off-site. The text of the rule can be viewed on the APCD website at www.sbcpd.org/rules/download/rule345.pdf.

Louis D. Van Mullem, Jr. • Air Pollution Control Officer
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APCD Comments on the Draft EIR for the South Coast 101 HOV Lanes Project, Project ID# 0500000225, SCH# 2009051018
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Page 2

2. All portable diesel-fired construction engines rated at 50 brake-horsepower or greater must have either statewide Portable Equipment Registration Program (PERP) certificates or APCD permits prior to operation. Construction engines with PERP certificates are exempt from APCD permit, provided they will be on-site for less than 12 months.
3. The applicant is required to complete and submit an Asbestos Demolition/Renovation Notification (APCD Form ENF-28 which can be downloaded at www.sbcpd.org/eng/dl/dl08.htm) for each regulated structure to be demolished or renovated. Demolition notifications are required regardless of whether asbestos is present or not. The completed notification should be presented or mailed to the Santa Barbara County Air Pollution Control District with a minimum of 10 working days advance notice prior to disturbing asbestos in a renovation or starting work on a demolition. For additional information regarding asbestos notification requirements, please visit our website at www.sbcpd.org/biz/asbestos.htm or contact APCD's Engineering and Compliance Division at (805) 961-8800.
4. If contaminated soils are found at the project site, the APCD must be contacted to determine if Authority to Construct and/or Permit to Operate permits will be required.
5. Asphalt paving activities shall comply with APCD Rule 329, *Cutback and Emulsified Asphalt Paving Materials*.

If you or the project applicant have any questions regarding these comments, please feel free to contact me at (805) 961-8890 or via email at cwv@sbcpd.org.

Sincerely,

Carly Wilburton

Carly Wilburton,
Air Quality Specialist
Technology and Environmental Assessment Division

cc: Project File
TEA Chron File

Santa Barbara Air Resources Control District

Comment 1 Vehicle Idling Restriction

In response to your comment, wording was changed for air quality measures related to idling in section 2.1.6. The measures now reflect use of the word “shall” to be consistent with what is typically used by your agency.

Santa Barbara Air Resources Control District

Comment 2 APCD Rule 345

Caltrans standard dust control measures fulfill the requirements of APCD Rule 345 by limiting the generation of visible fugitive dust emissions during demolition and construction activities.



**Santa Barbara County
Historic Landmarks Advisory Commission**

June 18, 2012

Matt Fowler, Senior Environmental Planner
Environmental Analysis
California Department of Transportation
50 Higuera Street
San Luis Obispo, CA 93401

Re: DEIR, South Coast 101 HOV Lanes Project, Cultural Resources Comments

Dear Mr. Fowler,

Thank you for providing the Santa Barbara County Historic Landmarks Commission (HLAC) with the Draft Environmental Impact Report (DEIR) for the South Coast 101 HOV Lanes Project. Our previous letter of August 8, 2011 to Ms. Paula Carr expressed the HLAC's concern regarding the 101 HOV Project's impacts on Historic Resources. Our comments regarding the Cultural Resources section are as follows:

The HLAC understands that the analysis of impacts in the DEIR is based upon the earlier technical studies. The 3-volume Historic Property Survey Report (HPSR) previously provided speaks to the historic value of the resources potentially affected. Although the DEIR concludes there is no significant impact on historic architectural resources the HLAC remains concerned that the project will affect the County's historic resources and certain Santa Barbara County Historic Landmarks.

1

The Ortega-Masini Adobe on Sheffield Drive is Santa Barbara County Historic Landmark #31 and sited in close proximity to Hwy. 101. Although noise impacts with the project will rise to a level warranting the construction of soundwalls, none will presumably be constructed because it is determined to be "Not Financially Reasonable". If a wall were to be constructed however, mitigation measures to preclude vibration impacts to the historic adobe must be incorporated.

2

The Summerland WW I Monument is Santa Barbara County Historic Landmark #35 and adjacent to the northbound Lillie Avenue exit. Noise impacts warrant the construction of a soundwall right next to the masonry structure but it is unclear whether this section of soundwall will be erected. The DEIR identifies adjacent sections of soundwall to have severe visual impacts and notes that if they are not built the remaining portion of wall "will not be financially reasonable." If a soundwall is erected next to the monument mitigation measures must be incorporated to avoid vibration impacts.

3

Planning and Development, 123 East Anapamu St., Santa Barbara, CA 93101
Phone (805) 568-2000

Although the monument is no longer eligible for the National Register of Historic Places due to its relocation, it has been “identified as a historic resource for the purposes of the California Environmental Quality Act” and warrants measures to protect it. In particular, the concrete monument itself is cracked and in an extremely fragile condition. Because it is immediately adjacent to the Lillie Avenue offramp, HLAC is deeply concerned that vibration or any other disturbance from the construction project poses a serious threat to the structural integrity of the Landmark and its very survival. The Commission asks that Caltrans incorporate in the 101 HOV Project mitigation measures to protect the Landmark, such as structural reinforcement and conservation of the monument itself, and possibly relocation of the monument to a suitable public site farther away from the project.

3

As the HPSR previously noted there are many structures of historic value along the proposed route of the project. The DEIR concludes that the project will not have “any direct or indirect effects on the National Register-eligible built-environment resources” because “it would not alter any of the characteristics that make the historic-period built environment resources eligible.” This statement however, relies upon a technical definition of “direct or indirect” effect that ignores certain realities. Increased development, increased noise and increased visual impacts will affect these structures and their use and appreciation by human beings.

Although the 1955 freeway revisions to the Montecito Parkway (1937-1948) substantially altered the historic integrity of the original roadway, numerous vestiges of the landmark parkway remain. Most notable are the layout of the primary and frontage roadways and the dramatic Cypress plantings still found in the median and shoulder plantings. The Montecito Parkway in its current state may not be eligible for the National Register of Historic Places but its development was of great importance, locally and regionally. The elimination of the median and /or shoulder landscaping in the 101 HOV Project will eliminate almost all vestiges of this early example of holistic highway planning.

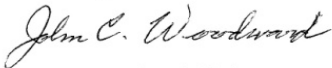
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Similarly the remnants of the Memorial Oaks originally planted in 1928 to memorialize Santa Barbara County soldiers who died during World War I will be dramatically impacted by this project. Although fewer than half of the trees remain and they are not eligible for the National Register of Historic Places, they represent a vanishing historic resource of local interest. We understand Caltrans has convened a Memorial Oaks Focus Review Group to consider ways to mitigate the project’s impacts. As noted in our previous letter, the HLAC would appreciate a copy of the recommendations and a statement of how Caltrans proposes to carry them out.

5

Thank you for your consideration.

Sincerely,



John C. Woodward, Chair
Historic Landmarks Advisory Commission

Planning and Development, 123 East Anapamu St., Santa Barbara, CA 93101
Phone (805) 568-2000

cc: Summerland Citizens Association, P.O. Box 508, Summerland CA 93067
Carpinteria Valley Association, P.O. Box 27 Carpinteria CA 93104
David Griggs, Carpinteria Valley Historical Society, 956 Maple Ave, Carpinteria CA 93013
Montecito Association, 1469 East Valley Road, Santa Barbara CA 93108
Salude Carbajal, 1st District Supervisor County of Santa Barbara
Alex Tuttle, Planner, Santa Barbara County Planning and Development
Dianne Black, Assistant Director of Santa Barbara County Planning and Development
Glenn Russell, Director of Santa Barbara County Planning and Development

Planning and Development, 123 East Anapamu St., Santa Barbara, CA 93101
Phone (805) 568-2000

Santa Barbara County Historic Landmarks Advisory Commission

Comment 1 Cultural Resources—General

In 2011 Caltrans determined that the proposed project would have an adverse effect on a portion of the Via Real Redeposited Midden. As documented in Section 2.1.7 of the draft environmental document, elements of the Via Real Redeposited Midden were moved onsite from their original location in connection with an early highway project. Recent design revisions were able to shift the preferred alternative (Alternative 1) toward the median in an effort to minimize potential impacts to the site. Comprehensive studies conducted by Caltrans suggest that the National Register-eligible portion of the site is not only located below the level of proposed Highway 101 construction but is also located outside the State right-of-way—and therefore outside the Area of Direct Impact. An Environmentally Sensitive Area (ESA) and exclusionary fencing will be established and enforced around the known site limits. Although we do not anticipate that there will be any impacts to the redeposited midden, or that significant portions of the site extend into the State right-of-way, or that any other significant archaeological resources are present, Caltrans has deemed it prudent to consider the remote possibility that discoveries during construction may still occur.

Caltrans consulted with the State Historic Preservation Officer and local Chumash representatives identified by the Native American Heritage Commission to develop a systematic approach to addressing not only any adverse effects to the Via Real Redeposited Midden but also effects to any similar as yet unidentified archaeological resources discovered during construction, in the unlikely event that such discoveries are made. Adverse effects to this property were initially proposed to be resolved by a Memorandum of Agreement prepared in consultation with the State Historic Preservation Officer and the Chumash representatives. As part of our ongoing consultation, however, the resolution document was restructured. Adverse effects will now be resolved in conformity with the June 20, 2013

Programmatic Agreement between the California Department of Transportation and the California State Historic Preservation Officer Regarding the South Coast 101 HOV Lanes Project, U.S. Route 101, Santa Barbara County, California. Both the Programmatic Agreement and its appended Treatment and Data Recovery Plan are included in Appendix D, *State Historic Preservation Officer Correspondence*, of this final environmental document.

Santa Barbara County Historic Landmarks Advisory Commission

Comment 2 Ortega-Masini Adobe—Vibration

No soundwall is recommended for installation within the 179-foot “minimum safe from damage” threshold identified for the Ortega-Masini Adobe (Santa Barbara County Historic Landmark #31) by the June 2011 Vibration Report and the September 2012 Revised Vibration Report. The Revised Finding of Adverse Effect document makes it clear that the resources would not be affected by either the presence or absence of soundwalls, or by the construction of such a soundwall.

Santa Barbara County Historic Landmarks Advisory Commission

Comment 3 Summerland WWI Monument

The Summerland World War I Monument was originally located on Wallace Avenue south of the current Highway 101 alignment. At that location, the concrete pedestal supported a flagpole and a short cross-bar carrying two smaller banners. In the 1950s, during construction of the four-lane highway through Summerland, a reinforced concrete retaining wall was built around the monument to protect it from being buried in road fill placed for the Wallace Avenue on-ramp. In the 1990s the monument (which, by this time, consisted of the pedestal surmounted by a short wooden cross) was designated Santa Barbara County Historic Landmark #35. On September 24, 1998, the concrete pedestal was moved to its current location in the Veterans Memorial Park on Lillie Avenue, on the north side of Highway 101.

A soundwall is currently proposed next to the flagpole location. Because the monument is located within the 64-foot “minimum safe from damage” threshold identified for the Summerland World War I Monument by the June 2011 Vibration Report and the September 2012 Revised Vibration Report, Caltrans will be using alternate construction methods in the vicinity of the Monument to avoid impacts from vibration. There is no potential for significant impacts to the historical resource due to the proposed South Coast 101 HOV Lanes project, and no mitigation measures are warranted.

Moving the monument in 1998 to its current location on Lillie Avenue appears to have impaired the structural integrity of the concrete pedestal. A photograph taken during the installation clearly shows that the pedestal was already cracked. The re-installation of the flagpole on top of the pedestal appears to have worsened the concrete cracking, probably due to the downward transference of wind-induced movement of the flag to the flagpole, and from the flagpole to the pedestal. It is, therefore, within the purview of the County to repair the pre-existing damage to the Summerland World War I Monument. No effects on the Summerland World War I Monument are expected from the project.

Santa Barbara County Historic Landmarks Advisory Commission

Comment 4 Montecito Parkway (1937-1948)

The Old Coast Highway that preceded the Montecito Parkway had a 60-foot right-of-way through the residential section of Montecito. Local traffic entering or crossing the highway suffered from poor visibility, and trees and shrubs were encroaching in the right-of-way. The first phase of the Montecito Parkway, as designed by Tilton and completed in late 1937, extended on Highway 101 from 500 feet south of San Ysidro Road to the intersection of Olive Mill Road at Coast Village Road.

As designed and constructed, the Montecito Parkway tripled the road width from 60 feet to 180 feet, creating a four-lane state highway with a median strip, a two-lane frontage road on either side of the highway, and access to the state highway at fixed intervals. The plan provided for a distinct separation between the side roads and the main thoroughfare by parkway areas of varying widths. Alignment and grades on the service roads were not planned to conform with the central four-lane pavement, but were designed to blend more closely with the natural topography of the area and at the same time preserve to the greatest extent possible the existing trees and shrubbery. Side roads were 18 feet wide. The center highway had 20-foot-wide traffic lanes with a concrete curb-lined median, generally 4 feet wide, except at a provided intersection with the side roads at San Ysidro Lane, where the median width was gradually increased to 25 feet just before reaching the intersection to allow access from the side roads. The curbs bordering the median were 4 inches high, and the median was filled with topsoil, which was planted with ice plant.

In the summer of 1938, following completion of the first phase of the Montecito Parkway, the average daily traffic count in the area between San Ysidro Road and Sheffield Drive was measured at 8,000 to 9,000 vehicles (including about 700 heavy trucks) on the weekdays, and 11,000 to 14,000 vehicles (including about 250 heavy trucks) on the weekend. The advent of World War II stalled further construction on the Montecito Parkway for a decade. By the summer of 1945, the average daily traffic count, measured at Olive Mill Road, had increased to about 22,000 vehicles, with trucks representing about 9% of the total.

The second phase of construction of the Montecito Parkway, beginning in 1947 and ending in 1948, followed Tilton’s plan, extending the parkway from San Ysidro Road to the project’s end at Sheffield Drive. As before, the second phase of construction removed trees and shrubs only if they fell within the

limits of the traffic lanes and shoulders or were in such close proximity to the traffic lanes as to constitute a potential hazard to traffic.

The fully completed Montecito Parkway was in use barely six years when it was decided to convert U.S. 101 to a full freeway through Montecito. Plans for the conversion were drawn in 1954, and by 1955 the new freeway was completed. To accommodate the freeway, the intersections at San Ysidro and Olive Mill Roads were eliminated, the rolled curbs were removed, the facility was widened to incorporate new exit and entrance ramps, and bridges were built to carry the cross traffic. Also, the western end was relocated to the south as a bypass around Coast Village Road. A new landscaping plan was implemented: some trees were saved, and many more new trees and shrubs were planted. Median strips and shoulders were altered to make way for the wider traffic lanes that were increased from 20 to 24 feet in each direction. In more recent years, metal guardrails have been installed. The median, shoulders and strips of land between the freeway facility and the frontage roads are landscaped with a variety of plants, including oleanders, pyracantha, ivy, pittosporum, acacia, sycamores, and palms. Most of the landscaping dates from the mid-1950s when the divided highway was converted to its current configuration as a limited-access freeway. Because the Montecito Parkway has lost so much of its original integrity, most important of which was its innovative design integrity, due to the magnitude of the incremental alterations, it is not a historic property under Section 106 of the National Historic Preservation Act or a historical resource for the purposes of the California Environmental Quality Act, and cannot be further considered for impacts to historic properties under these laws. Any project-related impacts on the landscaping, however, will be considered under Visual and Aesthetics impacts.

Santa Barbara County Historic Landmarks Advisory Commission

Comment 5 Memorial Oaks

The Memorial Oaks have lost their integrity through significant loss of trees and alteration of their original setting. They have been determined ineligible for listing in the National Register of Historic Places, and they do not constitute either a historic property under Section 106 of the National Historic Preservation Act or a historical resource for the purposes of the California Environmental Quality Act. They cannot be further considered for impacts to historic properties or historical resources under these laws. Recognizing, however, that the Memorial Oaks are of continuing interest to the local community, Caltrans convened a Memorial Oaks Focus Review Group to identify important community values represented by the trees and to advise us, and the Project Development Team in general, on ways to minimize project impacts on the Memorial Oaks, and to potentially revive the commemorative aspects of the Memorial Oaks. Robert Duncan, your appointed representative, attended all five of the Focus Review Group meetings, held between April 7, 2009, and May 5, 2010, and assisted in the development of recommendations for the Project Development Team. According to the Focus Review Group charter, participants were responsible for keeping colleagues, staff, or managers of their respective organizations informed of the groups' activities and recommendations.

Recommendations made by the Memorial Oaks Focus Review Group and adopted by the Project Development Team are included in the list of Avoidance, Minimization, and/or Mitigation Measures in section of 2.1.6 of the final environmental document and Appendix F. They are included below:

- Existing Memorial Oaks would be preserved to the greatest extent feasible, respective of the selected project alternative.
- All new oak trees planted as part of the Memorial Oak tree mitigation measure would be propagated from the existing Memorial Oak trees.

- All new non-oak planting near the Memorial Oaks would be species that are easily differentiated from the Memorial Oaks, in terms of their visual character (form, size, color and or texture).
- Concrete median barrier and new soundwalls in the immediate vicinity of the Memorial Oaks would include aesthetic treatment unique to the Memorial Oaks area.

Non-Profit Organizations and Businesses

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ARCHBOLD & SPRAY^{LLP}
ATTORNEYS AT LAW

May 17, 2012

Sent by E-mail and US Mail

Caltrans District 5
Environmental Branch
Attention: Matt Fowler
50 Higuera Street
San Luis Obispo, CA 93401
south.coast.101.HOV@dot.ca.gov

Re: South Coast HOV Lanes, Highway 101

Dear Mr. Fowler:

I am writing for myself and on behalf of neighbors of mine in the Montecito Oaks residential neighborhood. That neighborhood is bordered by Olive Mill Road on the west and North Jameson road on the south, with our southern-most homes virtually adjacent to Highway 101 ("101"). I and my neighbors have sent you three prior letters petitioning for a "neighborhood" sound wall. Attached as Exhibit A to this letter is the last of such letters, dated November 9, 2011, signed on behalf of 102 Montecito Oaks residents. My understanding is that such a sound wall has now been approved. It is identified as wall S520 and should provide *some* much needed protection to the Montecito Oaks neighborhood.

Unfortunately, Caltrans' decision to shorten the length of wall S520 is inconsistent with the intent of sound wall utilization, which I believe is to protect the maximum number of affected homes in a cost effective manner. As currently planned, wall S520 ends right at the southern entry to the Montecito Oaks neighborhood, at Santa Isabel Lane. Sound travels easily and constantly up into the neighborhood via Santa Isabel Lane, adversely impacting many more homes than were evaluated in the Caltrans noise study in this area. The failure to consider the adverse impact of the increasing traffic noise on many of the homes in the interior of Montecito Oaks is unfair, contrary to my understanding of state and federal guidelines and will fail to effectively protect the maximum number of homes.

Therefore, I and my neighbors are requesting that the acoustical condition of uphill (or northerly) homes on and around Santa Isabel Lane be investigated with supplemental noise studies or modeling. That investigation will prove that some of these homes on/around Santa Isabel Lane are also "severe receptors" of the constant din of 101 -- a condition that will only increase with 101 construction and the addition of more lanes which will accommodate faster and noisier vehicle speeds.

There is, however, a reasonable, cost effective solution to this problem. By extending wall S520 as little as 300 feet northbound (towards Olive Mill Road), not only will two more homes adjacent to 101 benefit from the protection of the extended wall, but many more uphill homes on or around Santa Isabel Lane will also receive much needed noise protection. It is

$$f(x) = \frac{1}{x^2} - \frac{1}{(x+1)^2}$$

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Caltrans District 5
May 17, 2012
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important to note that this requested extension will still result in a wall shorter than the one originally planned by Caltrans.

In conclusion, it appears that by failing to consider the likelihood that at least some uphill homes on/around Santa Isabel Lane would qualify as "severe receptors" of unacceptable noise from the 101 expansion project, Caltrans has declared the longer, original length of S520 to be financially unreasonable. Given the high density of potentially benefited residents of this neighborhood, particularly those uphill on or around Santa Isabel Lane, a sound wall segment of a slightly longer length is more appropriate to balance the construction cost against the benefited value of protecting the maximum number of homes in a cost effective manner.

Thank you for your consideration of this request to extend sound wall S520 at least 300 more feet northbound to fulfill both the federal and state mandated goals of protecting residential neighborhoods along the 101 corridor.

Sincerely,

Douglas B. Large
dlarge@archbald.com

Enclosure

c: Salud Carbajal, First District Supervisor
Richard Krumholz, District Director
Scott Eades, Project Management
Marcia Vierra, Caltrans Transportation Engineer

ARCHBALD & SPRAY, INC.



ARCHIBALD & SPRAY
INCORPORATED

November 9, 2011

Caltrans District 5
50 Higuera Street
San Luis Obispo, CA 93401
Attn.: Richard Krumholz, District Director
Jim Shivers, Public Information Officer

Caltrans District 5
1150 Laurel Lane
San Luis Obispo, CA 93401
Attn.: Scott Eades, Project Management

Re: 101 Freeway Widening: Sound/safety wall

Gentlemen:

The substance of this letter is identical to the two I previously sent you dated September 26 and October 19, 2011. I am resending it because forty (40) additional neighbors have endorsed its content and its objective, bringing the total number of Montecito Oaks neighbors petitioning for a sound/safety wall between Highway 101 and our neighborhood to one hundred-two (102).

We, the undersigned, are concerned residents of the Montecito neighborhood known as Montecito Oaks. Our neighborhood is bordered by Olive Mill Road on the west and North Jameson Road on the south, with our southernmost homes virtually adjacent to Highway 101 ("101" or "freeway"). Many of us have waited for years for a sound/safety wall to be built between 101 and our neighborhood. The purpose of this letter is to petition Caltrans to include such a wall when 101 is widened between San Ysidro Road and Olive Mill Road.

The proximity of 101 to Montecito Oaks presents several issues of public health, welfare and safety, as well as environmental and quality-of-life concerns. These issues and concerns will become even more severe with the planned widening of the freeway. In order to mitigate these unacceptable impacts of the freeway widening, a permanent sound/safety wall must be constructed on the north side of 101.

The continuous din of road traffic along 101 is detrimental to the health and welfare of the residents who live close to the freeway. Although the volume of noise varies, it is frequently extremely loud. This noise will increase substantially during and after the widening of the freeway. As you no doubt know, the adverse health and

EXHIBIT A



welfare impacts of prolonged exposure to noise have been documented in numerous studies. Freeway widening will increase the need for a permanent freeway wall to alleviate the impact of the often deafening noise.

Emissions from vehicles traveling on 101 present another health and welfare concern. Vehicle emissions and soot travel from the freeway to bordering neighborhoods and waterways. A permanent wall would also significantly mitigate this problem by hindering the migration of emissions and soot from the freeway to neighboring residences and to the environmentally sensitive Montecito Creek, which intersects the freeway just to the east of the Montecito Oaks neighborhood.

Public safety is also compromised by the proximity of 101 to North Jameson Road. North Jameson is a primary east-west artery located on the north side of the freeway and is used heavily by motor vehicles. In addition, pedestrians and bike riders use the Class II bike path located between North Jameson and 101. At present, only a chain-link fence separates the freeway from North Jameson. From time to time, motor vehicles from the freeway have crashed into or through the chain-link fence onto North Jameson. Also, motor vehicles traveling on North Jameson have crashed into or through the chain-link fence onto the ribbon of the freeway. The current situation is extremely dangerous to motorists, pedestrians and cyclists, and is no longer acceptable. The risks to life and property will become even more severe with the freeway widening and the faster vehicle travel. A permanent barrier would substantially reduce these safety concerns.

Finally, the proximity of the freeway to the Montecito Oaks neighborhood presents quality of life and aesthetic issues. The freeway is visually unattractive and stands in sharp contrast to the greenery and semi-rural atmosphere that it bisects. The freeway is now plainly visible at several points between San Ysidro Road and Olive Mill Road. A freeway wall would block the freeway from view. The visual impact of the wall can be mitigated by planting suitable vegetation near and on the wall itself.

These arguments for construction of a freeway wall are compelling. We support the construction of such a wall and request the opportunity to comment on how the wall should be constructed, screened by vegetation and maintained at the appropriate time.

Respectfully submitted,

M/M Douglas B. Large, 1383 Santa Clara Way
M/M James R. Haslem, 144 Santo Tomas Lane
M/M Glen H. Mitchel, 180 Santo Tomas Lane
M/M Brian Scarminach, 166 Santa Elena Lane
M/M Phillip Kyle, 173 Santa Isabel Lane

ARCHIBALD & SPRAY
INCORPORATED

Archbald & Spray, LLC (Douglas B. Large)

Comment 1 Soundwall

As a result of public comments on the draft environmental document, Caltrans staff reevaluated soundwalls located in high-density residential areas to identify short sections of soundwalls that might be financially reasonable. Since the current estimated cost of the western section of soundwall is less than the cost allowance, a wall to extend S520 northward to protect the densely populated area between Santa Isabel and Olive Mill Road is now being recommended for construction. Please refer to section 2.2.7 of the final environmental document for more discussion of Soundwall S520. Please note that proposed walls will be evaluated as part of the Coastal Development Permit process, which will consider visual concerns associated with any of the potential soundwalls.



Matt Fowler, Senior Environmental Planner
Environmental Analysis
California Department of Transportation
50 Higuera Street
San Luis Obispo, CA 93401

10 May 2012

Dear Mr Fowler,

Please consider my comments about the DEIR for the South Coast 101 HOV Lanes Project. As an avid bicyclist and a 30-year concerned resident of Santa Barbara, I have been following infrastructure projects with interest.

I favor **Alternative 1** because it has the most flexibility.

I favor the Cabrillo interchange **Configuration F Mod** because it:

- Closes the tight and rarely-used Los Patos exit.
- It saves \$40+ million by not elevating the railroad.
- It sends Cabrillo traffic directly to Cabrillo and doesn't clog Coast Village Road with motorists seeking beachfront amenities.
- It avoids unneeded changes to seldom-used Hermosillo.

On page 92 of the DEIR, the text states "Despite the overall decline in bike commuters nationally, Santa Barbara County still ranks high in the number of bicycle commuters." This is only half true.

Data from the US Census Bureau on commute trip to work show that from 1990 to 2010, bicycle commute mode share has increased from 0.41% to 0.53%. It may not seem like much, but it represents 642,000 more bicyclists. Of relevancy to this project of course is Census Bureau data for the County of Santa Barbara—bicycle commuting from 1990-2010 has increased from 3.35% to 4.13%; indeed, that's now eight times the national average.

Contact me any time. Thank you.

Ralph Fertig
Bike Santa Barbara County

Bike Santa Barbara County

1569 Sycamore Canyon Road, Santa Barbara, CA 93108
805.962.1479 • www.bike-santabarbara.org • bikesbcounty@gmail.com

Bike Santa Barbara County (Ralph Fertig)

Comment 1 Alternative and Configuration Selection

After consideration of public input and on the basis of many of the reasons your organization cited, Caltrans has selected Alternative 1 as the preferred alternative and F Modified as the recommended configuration for the Cabrillo Boulevard/Hot Springs Road Interchange.

Bike Santa Barbara County (Ralph Fertig)

Comment 2 Alternative and Configuration Selection

Section 2.1.5 of the final environmental document has been updated according to more recent statistics.

Brownstein Hyatt
Farber Schreck

July 9, 2012

VIA E-MAIL TO SOUTH.COAST.101.HOV@DOT.CA.GOV

Mr. Matt Fowler, Senior Environmental Planner
Environmental Analysis
California Department of Transportation
50 Higuera Street
San Luis Obispo, CA 93401

RE: Public Comments re South Coast 101 HOV Lanes Project Draft Environmental Impact
Report/Environmental Assessment

Dear Mr. Fowler:

Brownstein Hyatt Farber Schreck represents property owners on Fernald Point Lane and Padaro Lane. We submit these comments on the South Coast 101 HOV Lanes Project (Project) Draft Environmental Impact Report/Environmental Assessment (DEIR/EA).

For the reasons set forth below, the DEIR/EA does not meet the minimum requirements mandated by the California Environmental Quality Act (CEQA).

I. Global Comments

The DEIR/EA refers to various technical studies and reports completed in association with the Project. Most of these appear to be available only under separate cover and the references in the document fail to indicate where these studies are located. CEQA, and the case law interpreting it, requires that where an environmental document cross-references studies and reports not included in the document, the document must provide information as to where the cross-referenced documents are available for public review and inspection and shall make those documents readily available to the public at such locations as the Internet, in public libraries, and elsewhere throughout the Project area. Caltrans does not have an office (where it could make the documents available) in the Project area so the cross-referenced documents should have been provided at the offices of the County and City Clerks at a minimum, and the information as to the location of the cross-referenced documents should have been published in the DEIR/EA. As it is, the public has had no access to those documents to determine their relevance and to analyze whether or not they support the statements made in the DEIR/EA. These documents are not posted online with the DEIR/EA and the DEIR/EA fails to disclose where the public can access them for review.

As further discussed below, the summaries of many of the technical studies referred to in Chapter 2 and elsewhere in the DEIR/EA do not adequately explain the methodology and assumptions used. As such, the conclusions drawn regarding potential impacts and their significance are not adequately supported by facts set forth in the DEIR/EA. Conclusions without factual support do not satisfy the requirements of full disclosure and, therefore, render the DEIR/EA inadequate.

CEQA Guidelines § 15123(b) requires an EIR to contain a summary identifying "each significant effect with proposed mitigation measures and alternatives that would reduce or avoid that effect." While the summary (DEIR/EA pp. i-xi) includes a table titled "Summary of Major Potential Impacts from

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Page 2

Alternatives" (Table S.1), it does not specify whether the listed impacts are impacts under NEPA, CEQA or both, nor does it specify the level of impact under CEQA (e.g., significant but mitigable, significant and unmitigable). In fact, it is unclear from the document whether the term "major" refers to significant impacts. Finally, the table does not include a list of proposed mitigation measures to reduce or avoid the effects. A comprehensive list of clearly defined mitigation measures pursuant to this CEQA requirement is not included anywhere else in the document either. Neither the Avoidance, Minimization, and/or Mitigation Measures sections of Chapter 2 nor the Minimization and/or Mitigation Summary in Appendix F indicate which measures are avoidance or minimization versus those that are required mitigation pursuant to CEQA. This defect results not only in a failure to comply with the CEQA requirement, but makes it extremely difficult for the reader to gain a full understanding of the proposed Project and to conclude whether or not the proposed mitigation measures adequately address the Project's impacts. Proposed mitigation measures in compliance with all CEQA and NEPA requirements should be clearly stated, compiled into a comprehensive list, numbered and cross-referenced throughout the analysis. Without a clear identification of impacts that are significant but mitigable and impacts that significant but not capable of being fully mitigated, along with proposed mitigation measures and an explanation as to why the impacts are not fully mitigable, the DEIR/EA fails to satisfy basic CEQA requirements for disclosure and analysis. The document also fails to explain what mitigation measures were deemed to be infeasible and upon what grounds infeasibility was determined.

As further discussed below, in numerous instances the analyses in Chapter 2 and Chapter 3 and the CEQA Checklist (Appendix A) contradict one another. In other instances, the document fails to clearly state the level of impact pursuant to CEQA.

II. Proposed Project and Alternatives

The DEIR/EA fails to adequately analyze the appropriateness of the additional lanes being designated for HOV use through the Carpinteria, Summerland, and Montecito areas where highway exits are located within short distances of one another. Current studies, not included in the DEIR/EA, demonstrate that HOV designation of lanes reduces their vehicle capacity. Of more immediate concern are the public safety implications of HOV lanes in areas of multiple off-ramps because of the turbulence that results when drivers of vehicles in the HOV lane suddenly realize that they must cross traffic lanes to reach their exit while other drivers are entering the highway and crossing the same traffic lanes to enter the HOV lane, all in a very short distance because of the close spacing of onramps and exit ramps. The failure to analyze this safety issue and to propose mitigation measures or project alternatives, including adding the lanes without designating them for HOV use, constitutes non-compliance with CEQA requirements.

The DEIR/EA acknowledges that the project will have a substantial adverse impact upon existing scenic resources. We concur. This portion of Highway 101 has been designated as a scenic highway, yet the proposal includes removal of vast stretches of existing landscaping, both in the existing median and on both sides of the highway. This will not just substantially impact scenic resources, it will significantly degrade the existing visual character and quality of the communities impacted by the project. The neighborhoods bordering Highway 101 in the Summerland and Montecito area represent some of the most beautiful and valuable real estate in the nation. The highway itself creates a gateway to the cities of Santa Barbara and Carpinteria.

The failure to include any meaningful landscaping in the median and alongside the newly widened highway and the proposal to exclude addition of vital sound walls under the guise of economic feasibility render the DEIR/EA inadequate under CEQA. The DEIR/EA simply concludes that some of these aesthetic impacts are unavoidable, but fails to explore options for avoiding or minimizing the impacts.

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As to the sound walls, the DEIR/EA discloses potentially significant impacts upon a large number of ocean-front homes, but dismisses mitigation of the significant noise impacts with an arbitrary and capricious formula that compares the assumed value of abating the noise impacts on these homes against the cost of constructing the sound walls. The DEIR/EA fails to disclose the basis for the assumed "abatement valuation" and uses the same base figure (modified upward when additional factors are considered) for houses worth several hundred thousand dollars as it uses for houses worth several million dollars. Abatement valuation must be based upon the value of the home because the avoidance of a decrease in that value by buffering the home from the increased noise levels is the very definition of "abatement value." The DEIR/EA doesn't even explain how the same base value – \$31,000 – rationally can be applied to homes of radically differing fair market value. In short, the DEIR/EA attempt to rationalize its recommendation that the most obvious and feasible mitigation measures – sound walls – fails to comply with CEQA requirements because it fails to provide a factual basis for a finding of economic infeasibility.

Section 1.4 (Permits and Approvals Needed) fails to identify the requirement for a federal Coastal Zone Management Act consistency determination.

III. Environmental Analysis

Land Use

The Environmental Consequences subsection of Section 2.1.1.2 Consistency with State, Regional and Local Plans (pp. 47-51) states there may be numerous inconsistencies with adopted policies of local jurisdictions including scenic and visual resource, wetland and creek protection, and historical resource policies. However, the analysis fails to provide adequate information to allow the reader to understand the scope of the policy inconsistencies. CEQA requires specific explanations of how the Project conflicts with the identified policies. For example, Table 2.2 indicates that the proposed Project would not achieve the minimum buffer distance from wetlands, streams, and riparian areas, but does not specify what the proposed buffer distance is or what buffer distance each of the policies require.

In addition, while the Environmental Consequences subsection of Section 2.1.1.2 suggests that policy amendments are required, the Avoidance, Minimization and/or Mitigation Measures subsection does not propose any policy amendments as mitigation. Instead, this section suggests that conditions of the required coastal development permits from the various local jurisdictions can minimize impacts to visual resources, wetlands and landscaping (p. 51). Minimizing impacts does not eliminate a policy inconsistency, nor does delayed, undisclosed, and unanalyzed mitigation satisfy CEQA requirements. As proposed, the Project would require amendments to various policies with which it is inconsistent in order to obtain the required coastal development permits because all jurisdictions require a finding that a proposed Project is consistent with all policies of their certified local coastal programs. These amendments must be approved by the local agencies and certified by the Coastal Commission. Since many of the policies applicable to visual resource, wetland, and creek protection are taken directly from the Coastal Act, amendments to such policies would also be inconsistent with state law. Either the environmental document must be revised to provide adequate mitigation to disclose, analyze, and propose adequate mitigation to address the policy inconsistency issues or the Project must be revised to comply with the applicable policies. If amendments are proposed, the analysis must include an evaluation of the impacts of such amendments on future development. For example, amending County creek and wetland setbacks would likely have significant and unavoidable impacts because it could allow extensive new development in areas where development presently is prohibited by the existing policies.

The DEIR/EA states that the "proposed build alternatives for the Project are consistent with the associated federal, state, and local plans, but could potentially conflict with wetland setbacks identified

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in the Santa Barbara County Coastal Land Use Plan, City of Santa Barbara General Plan, and the City of Carpinteria General Plan/Local Coastal Land Use Plan" (p. 52). This statement is internally contradictory and contradicts other information provided in the document. If the Project conflicts with policies in these plans, it is not consistent with them. This statement must be revised to accurately reflect consistency or inconsistency and to explain the revision. In short, just changing the words is not sufficient – the Project either is or is not consistent with applicable policies so a change in wording must explain how the Project has been brought into consistency or how inconsistencies have been overcome through policy amendment.

While the analysis in Section 2.1.1.3 Coastal Zone identifies a potential inconsistency with Coastal Act section 30251 (Scenic and visual qualities), it fails to analyze other potential inconsistencies. In particular, the Project appears to conflict with Coastal Act section 30240 which states in part, "environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas." There are several environmentally sensitive habitat areas, primarily in and around creeks within the Project area which would be impacted as part of the Project. The analysis must also evaluate consistency with all applicable Coastal Act provisions, including but not limited to section 30231 (Biological productivity; water quality), section 30236 (Water supply and flood control), and section 30253 (Minimization of adverse impacts).

The CEQA Evaluation (Chapter 3) fails to address land use and planning impacts and the CEQA Checklist (Appendix A, Item X.b) indicates that conflicts with applicable land use plans, policies and regulations would be a less than significant effect. This is contradictory to the analysis in Chapter 2 and must be revised.

As stated in section II above, the DEIR/EA fails to identify the requirement for a federal Coastal Zone Management Act (CZMA) consistency determination. The federal government certified the California Coastal Management Program (CCMP) in 1977. The enforceable policies of that document are Chapter 3 of the California Coastal Act of 1976. All consistency documents are reviewed for consistency with these policies. The DEIR/EA notes that the CZMA applies to the Project (p. 51) but fails to evaluate the Project's consistency with the CZMA.

Traffic and Transportation/Pedestrian and Bicycle Facilities

The ramp collision analysis concludes that accident rates for the ramps proposed to be modified as part of the Project are higher than statewide averages. However, a closer look at the data shows that, with the exception of the southbound Los Patos off-ramp, accident rates are close to the statewide average. In fact, the statewide average rates for fatal plus injury accidents for similar facilities is higher in three of seven cases and only three percent higher in two other cases. The statewide average rates for total accidents is also higher in three of seven cases and there have been no fatal accidents on any of the off-ramps. This analysis should be revised to more accurately reflect the data. Further, conclusions regarding costly and, in some cases, environmentally damaging proposed changes to these ramps should be reevaluated.

The Intersection Analysis (pp. 99-105) states that the analysis was completed "to ensure that the proposed project would not result in substantial changes to traffic levels at ramp junctions and local intersections." However, the analysis fails to consider numerous intersections which are likely to be affected by the proposed Project. Specifically, all of the intersections in the Coast Village Road commercial area have the potential to be impacted by changes to the Cabrillo Boulevard/Hot Springs Interchange. Depending on the configuration selected, a significant amount of traffic could be diverted onto Coast Village Road, decreasing its level of service and increasing safety hazards in what is intended to be a pedestrian-oriented area. The intersections of Coast Village Road and Olive Mill

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Road, Coast Village Circle, Middle Road, and Butterfly Lane should be evaluated to determine both the Project's impact on level of service and the potential for reduced pedestrian and bicycle safety.

The Intersection Analysis for secondary intersections (pp. 102-103) states that level of service thresholds would be exceeded for four of the 11 intersections evaluated but fails to provide information on the current versus estimated future level of service. (Table 2.19 provides a level of service summary for primary intersections, but no information is provided regarding for secondary intersections.) Instead, the analysis simply concludes that the increases in traffic due to the Project would be "relatively minor" and no work to address these impacts would occur at these locations. The DEIR/EA does not provide adequate data or analysis to support such a conclusion so it is inadequate under CEQA.

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Regarding traffic impacts at the intersection of Los Patos Way and Cabrillo Boulevard, the analysis indicates that while the intersection is projected to operate at LOS F during peak hours in 2020 and 2040, no changes are being proposed to address this impact as part of the Project because the City of Santa Barbara has already included an intersection improvement project in its 2011-2016 Capital Improvement Program. CEQA Guidelines § 15123.4(a)(2) requires that mitigation measures "must be fully enforceable through permit conditions, agreements, or other legally binding instruments." The City of Santa Barbara's contemplated project is in no way tied to the Highway 101 HOV Project and there is no guarantee as to when and if it will be completed. As such, this is not adequate mitigation for the Project's impacts to the Los Patos Way and Cabrillo Boulevard intersection.

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The Collisions analysis (p. 107) states that "[e]ach ramp that has a higher than expected accident level would either be closed or rebuilt with standard geometry to eliminate short deceleration lanes, and curves with limited stopping sight distances would be corrected to standard distances." As stated above, the analysis of data regarding ramp accident rates is flawed and in fact, only some of the ramps proposed to be closed or rebuilt have higher than average accident rates as compared to statewide averages and many others have only slightly higher rates. This analysis should be revised to accurately reflect the data. Additionally, alternatives such as more minor improvements to the existing ramps rather than complete relocation and reconstruction should be considered.

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The CEQA Evaluation (Chapter 3) fails to address transportation and traffic impacts and is inadequate under CEQA.

Visual/Aesthetics

The description of the existing visual setting (pp. 109-110) focuses on views of the surrounding area from the highway. It fails to adequately address the visual characteristics of median landscaping within the Project area which significantly affects the viewing experience. Since the choice of whether to maintain or eliminate median landscaping is the main premise for the various build alternatives, the view impact analysis must thoroughly analyze these existing conditions.

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The discussion of Memorial Oaks in the Visual/Aesthetics analysis (pp. 112-115) focuses on the determination that the trees are not eligible as a historic resource. This issue is not relevant to the visual analysis and only confuses the issue, which is whether removal of a significant amount of large oak trees has a visual impact regardless of their history or origin. The analysis fails to adequately address this issue.

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Additionally, the Memorial Oaks discussion concludes with the statement that the efforts of the Memorial Oaks Focus Review Group "resulted in several formal recommendations being made to the project development team" (p. 115). However, the document does not identify what these recommendations were, whether they were incorporated into the Project and to what extent, if any, they

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mitigate the impacts of the proposed tree removals. There does not appear to be any documentation of the efforts of this group other than the brief and incomplete summary on pages 114-115.

The explanation of the methodology utilized by the Visual Impact Assessment is poorly written and incomplete (pp. 123-124). For example, the description does not explain what scale is used for the Visual Quality Evaluation and View Response rating. The use of terms like "moderately high," "above average," "above moderate," etc. is arbitrary and includes no scale or definitions. Further, summaries of the analysis for specific Observation Viewpoints reference "three criteria identified by the Visual Quality Rating," however the explanation of the methodology never mention criteria.

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The analysis of views in the Summerland Assessment Unit does not include any Observation Viewpoints from Highway 101 toward the Summerland/Lillie Avenue commercial area. Changes to the highway, and in particular the contemplated construction of soundwalls (even though these are not recommended for this area) would significantly impact the economy of this commercial area which is dependent on pass-by traffic on the highway seeing commercial businesses and stopping to patronize these businesses. The statement at the end of p. 207 recognizes that proposed soundwalls would limit much of the view to the Summerland community, but still fails to analyze this impact. The analysis should include an assessment of the impact of soundwalls as well as other Project changes on the businesses along Lillie Avenue.

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The reference to "configuration M" in the last sentence at the end of p. 201 appears to be incorrect. This statement should reference configuration F Modified.

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While the CEQA Evaluation (Chapter 3) addresses cumulative visual/aesthetic impacts, it fails to address the Project level visual/aesthetic impacts. This analysis is required by CEQA and must describe the significant, unavoidable impacts, as identified in Chapter 2 and the CEQA Checklist (Appendix A), and propose mitigation measures to reduce the impacts to the maximum extent feasible.

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Cultural Resources

DEIR/EA Section 2.1.7 (Cultural Resources) states that Caltrans prepared a Finding of Adverse Effect, concluding that all three of the proposed Project's build alternatives would cause direct adverse effects to the National Register-eligible archaeological site, the Via Real Redeposited Midden (pp. 224-225). The CEQA analysis also refers to the "unavoidable adverse effects to the Via Real Redeposited Midden" (p. 431). However, the CEQA checklist (Appendix A, Item V.b) contradicts this information by identifying the impact as less than significant with the proposed mitigation. The CEQA checklist should be revised to accurately identify the impact to cultural resources as significant and unavoidable.

23

While there are no known buried cultural resources or human remains within the Project area, there is still the potential for discovery of previously unknown cultural resources and/or human remains. As such, the ground disturbance proposed by the Project has the potential for an impact under CEQA. The CEQA analysis and checklist (Item V.d) should be revised to acknowledge this possibility, identify the potential impact and propose adequate minimization and/or mitigation measures that will be taken should previously undiscovered cultural resources or human remains be discovered in the course of Project construction.

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Hydrology and Floodplain

The references to Appendix F for Floodplain Mapping on pp. 229-230 are incorrect. References should be to Appendix E. | 25

The DEIR/EA states that the Location Hydraulic Study and Water Quality Report prepared for the Project assumes the bridge work proposed as part of the Linden Avenue and Casitas Pass Road Interchange project would be completed prior to the Highway 101 HOV Project (p. 229). Pursuant to CEQA § 15125(a), the Project baseline is the existing condition at the time the environmental impact report is prepared. Completion of another project sometime in the future cannot be assumed as part of the baseline. Therefore, the analysis uses an inappropriate baseline assumption. This is a fatal flaw and the DEIR/EA must be revised to bring it into compliance with CEQA. Under existing conditions, the Project does have the potential to result in significant impacts by placing structures within the 100-year flood hazard area which would impede or redirect flows and adequate mitigation must be included for this Project. | 26

Water Quality and Stormwater Runoff

The DEIR/EA Water Quality Analysis should be updated to reflect the final 2008-2010 List of Impaired Waterbodies approved by the U.S. EPA on November 12, 2011. Romero, Toro Canyon, Arroyo Paredon, Santa Monica, and Franklin creeks are all listed for various pollutants. | 27

The discussion of environmental consequences states that "[n]ot all treatment is planned to be incorporated where new impervious areas are being created due to available treatment areas," (p. 247) but fails to describe where proposed treatment would occur. Would all treatment be within the Project area or is off-site mitigation proposed? What are the residual impacts if 100 percent of the water quality volume in a particular area is not treated? | 28

Increased trash (i.e., litter) is identified as a permanent impact of the Project (p. 248), but the DEIR/EA fails to quantify this impact. Is it a significant impact under CEQA? Permanent design measures proposed to avoid, minimize and/or mitigate impacts state that "[l]itter on the highway would be removed periodically as part of regular maintenance procedures" (p. 251). Would regular maintenance need to be increased due to the increased litter resulting from the Project? How would that maintenance be provided? Trash along the highway in the Project area not only is a visual impact, but it poses a threat to creeks and to marine life because of the proximity of the Project to creeks and to the ocean. As one who drives the highway from Carpinteria to the City of Santa Barbara on a regular basis, I can state that trash along the highway already poses a noticeable problem and citizen volunteers are the only people that I have observed cleaning up the trash when clean-up occurs. The Project should include a clear statement as to how future clean-up will be scheduled and a responsible party who is charged with ensuring that the clean-up occurs as scheduled, as well as a contact number available to the public (and preferably posted on signs along the highway) to complain when trash becomes an eyesore and a potential stream and ocean pollutant. | 29

Permanent design measures for Water Quality and Stormwater Runoff impacts indicate that "where impacts to riparian areas are unavoidable, mitigation onsite or offsite will be proposed" (p. 251). CEQA Guidelines § 15126.4(a)(1)(B) requires that formulation of mitigation measures may not be deferred until some future time. Where it is not possible to specifically define mitigation, performance standards which would mitigate the impact may be established. The statement that mitigation for riparian areas will be proposed at some unknown location at some point in the future is not adequate mitigation under CEQA. The proposed mitigation must specify standards by which the mitigation area(s) will be | 30

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identified and set specific standards for how and when the mitigation will occur. Only in this way can the public and the decision makers assess the adequacy of the proposed mitigation.

The analysis in Chapter 2 and 3 indicate that the Project would result in significant impacts pursuant to CEQA. However, the CEQA Checklist (Appendix A) contradicts the analysis, identifying all potential water quality related impacts as being less than significant or no impact. The CEQA Checklist must be revised to accurately reflect the DEIR/EA analysis and proposed mitigation measures must be more specifically identified. | 31

Geology/Soils/Seismic/Topography

The Geology/Soils/Seismic/Topography analysis states that preliminary geotechnical studies associated with various structures proposed for the Project were completed, but fails to indicate where these studies are available for public review as required by CEQA.

The description of liquefaction risks under the Affected Environment section (p. 253) defines the term but fails to indicate to what extent liquefaction is a hazard in the Project area.

The description of corrosion risks under the Affected Environment section (p. 254) states that soil and groundwater samples will be tested for corrosion potential. When will this occur? What was assumed for the purposes of environmental analysis if this testing is being delayed? | 32

Proposed Avoidance, Minimization and/or Mitigation Measures for erosion impacts include a statement that "[a]ll new cut slopes would be excavated with slopes of 2:1 or flatter whenever possible" and "[p]aved top-of-cut ditches would be provided to the greatest extent possible" (p. 254). What will occur if these measures are determined infeasible?

The analysis of geology, soils, and topography in this document is fatally flawed and requires significant revision in order to comply with CEQA requirements.

Paleontology

The paleontological analysis indicates that "[s]ince the Rincon Formation is next to proposed excavation sites, mitigation in the form of monitoring, salvage, and data recovery may also be necessary in this formation" (p. 258, emphasis added). However, the CEQA analysis (p. 432) indicates that mitigation measures, "specifically monitoring, salvage of fossil specimens, and data recovery" would be implemented to reduce the impact to less than significant. These analyses should be revised to be consistent with one another. The inconsistency renders the analyses inadequate under CEQA. | 33

Hazardous Waste or Materials

The Hazardous Waste analysis, Environmental Consequences subsection indicates that a newly discovered underground storage tank was identified in Summerland (p. 265-266). This site is identified as "Site # 27" in the text but appears to be Site # 12 in Table 2.24. The site numbering should be clarified.

Removal of the tank and clean up of Site # 27 requires a permit and oversight from Santa Barbara County Fire Protection Services Division. If this tank is located in the Coastal Zone, it will also require a coastal development permit. The analysis should specify all of the approvals required. The analysis states that "removal would be performed as part of a separate project, which has already been initiated." At what stage in the process is this removal now? How long will site clean up take? Have | 34

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the required permits already been obtained for the steps taken to date? While the analysis indicates that the removal would occur prior to the Project, there is no indication as to the basis for ensuring that this actually will occur. CEQA Guidelines § 15126.4(a)(2) requires mitigation measures either be incorporated into the design of the Project or be fully enforceable through conditions, agreements, or other means. Therefore, removal and clean up of this site prior to construction of the Project must either be incorporated as part of the Project or be a mitigation measure in order for the DEIR/EA to validly conclude that the underground tank would not pose any further risk to the Project.

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The CEQA Evaluation (Chapter 3) fails to address hazards and hazardous materials impacts. In addition to the baseline issue identified above, Site #27 is located across Lillie Avenue from an elementary school and thus results in a potentially significant impact under CEQA (CEQA Checklist Item VIII.c) which must be mitigated.

The property located at 2285 Lillie Avenue in Summerland appears to be within the Project area and is identified on the California EPA's Cortese List (<http://www.calepa.ca.gov/sitecleanup/corteselist/>) as having a leaking underground storage tank. The EPA's database indicates the cleanup status of this site is "Open-Site Assessment." However, this site was not identified or analyzed in the hazardous waste analysis.

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The DEIR/EA states that the Department of Toxic Substances Control issued a variance which allows Caltrans to reuse lead-contaminated soil within the state highway corridor in accordance with conditions of the variance (pp. 266-267). This variance does not obviate the CEQA requirement to analyze potential environmental impacts of such use as part of a specific project, unless these potential impacts were previously analyzed. Since the DEIR/EA does not state that any previous analysis considered these particular impacts, it must be assumed that such an analysis has not occurred and as such, is required for this Project. Without the analysis, this section fails to comply with CEQA.

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Air Quality

In the Naturally Occurring Asbestos subsection (p. 282), the statement regarding the nearest ultramafic rock occurrence is missing a unit of measure. It states that "the nearest ultramafic rock occurrence is about 7 northeast of the project area." Seven what? This failing makes it impossible for the reader to ascertain the location and its implications for the Project.

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The CEQA Evaluation (Chapter 3) fails to address air quality impacts.

The mitigation proposed to minimize operational air emissions include "the consideration of maximizing vegetative plantings," incorporation of recycling techniques "to the extent feasible," and measures to conserve energy and nonrenewable resources "whenever possible." (p. 283). In order to mitigate an identified significant impact, mitigation measures must be enforceable. Mere "consideration" or incorporation "to the extent feasible" does not guarantee that a significant impact will be mitigated to a less than significant level. The DEIR/EA must provide measurable and enforceable mitigation and must analyze the extent to which the proposed mitigation reduces the identified impact(s).

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Noise

The attached letter from acoustical engineer Tom Corbishley of Behrens and Associates, Inc. describes in detail specific defects in the noise analysis performed for the Project DEIR/EA. These defects result in an artificial reduction in the noise readings for ocean front parcels, particularly those in the Fernald Point area. Because the study upon which the noise impact analysis in the DEIR/EA is based upon a model that was "corrected" to reduce its projected noise impacts by 3 dB, the entire analysis is fatally

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flawed. The defect arises primarily from two factors. First, the calibration between the field readings and the model was performed during non-peak hour. CEQA requires a reasonable worst case analysis and it is widely acknowledged that peak hour, not non-peak hour, is the appropriate standard for determining reasonable worst case impact levels. Peak hour is the time when noise levels from the Project will have the most significant impact upon nearby residences and other sensitive receptors. Second, the calibration assumed that a 3.2 dB deviation between the field measurement and the model was due to complicated terrain and didn't take into account the fact that calibration site was experiencing an ocean wind of 9 MPH, blowing the sound back toward the highway. This would account for the deviation and the model's original projections should have been used rather than reduced.

It also should be noted that a majority of the short-term noise readings were taken during non-peak hour (for noise) traffic conditions. This is demonstrated by comparing the peak hour for existing traffic noise as reflected by the 24-hour readings to the time periods during which the short-term readings were taken. For the reasonable worst case analysis required by CEQA, all of the short-term noise reading should have been taken during peak hour (for noise) traffic periods. As explained in the report, the peak hour for traffic noise differs from peak hour traffic. The noise study attempts to rationalize the failure to take short-term readings entirely within the peak hours for noise by suggesting a logistical challenge ("taking short-term noise measurements at 45 locations during only the peak hours was not possible within a reasonable amount of time"), but the readings were taken on different days so there is no valid reason for not taking them entirely during the peak noise times.

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The traffic noise reading reports also are flawed because, although they have a space for inserting the wind speed and direction, the reports either state that the wind condition was "calm" or fail to insert anything in those two spaces. For the ocean-front properties in the Project area, where the prevailing wind blows off the ocean and buffers the highway noise by blowing it back to the north, sound measurements that don't reflect whether or not the wind was blowing off the ocean at the time of the reading are unreliable and cannot be used to determine accurately the degree of noise impact from the Project. Although the ocean breeze is the prevailing wind for these residences, it is not a constant. A valid noise analysis should assume a reasonable worst case – that the wind either isn't blowing at all or that it is a down-canyon wind, which occurs frequently in warmer months when occupants of the ocean-front residences are most likely to be outside and most susceptible to noise impacts from the Project.

As a consequence of the factors set forth in the attached letter from Behrens and Associates, Inc. and the factors described above, the sound analysis in the DEIR/EA is fatally flawed and doesn't meet CEQA requirements for adequacy.

The analysis also miscalculates the value and necessity of a sound wall between Fernald Point Lane residences and the Project. Existing noise levels, even with the 9 MPH ocean breeze, are quite high along Fernald Point Lane. The model was calibrated at a mid-point on Fernald Point Lane and predicted a 65.9 dBA sound level at that time and place, without the Project. Receivers along Fernald Point Lane showed existing readings of 67 dB, 69 dB, 70 dB, 71 dB, and 73 dB, with projected noise levels along Fernald Point Lane of 72-74 dB with the Project. By adding back the 3 dB "correction," these noise levels would be at and over the 75 dBA threshold that Caltrans deems to be "severely affected." The Caltrans threshold for noise abatement for residential receptors is 67 dB. The County of Santa Barbara's CEQA Guidelines use 65 dBA as a threshold of significance in residential exterior living spaces. Whichever standard is applied, it is clear that Fernald Point Lane residences already suffer from high noise impacts as a result of Highway 101 traffic. Addition of lanes as part of the Project will elevate these impacts to an undesirable and potentially "severely affected" level.

The DEIR/EA acknowledges that use of a mitigation measure, in this case, a sound wall, is mandatory when residences are "severely affected" by the Project. Although the DEIR/EA suggests that there is

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"heavy vegetation" that provides adequate noise buffering between the highway and Fernald Point Lane residences, this is false and misleading. There is no heavy vegetation in this area. A single row of hedge with scattered tall trees lies between Fernald Point Lane and the highway. It has no dense understory. The highway traffic is visible from Fernald Point Lane, so any sound buffering is minimal or zero.

The noise analysis acknowledges that a sound wall between Fernald Point Lane and the Project will reduce noise levels by at least 5 dB for the residences. Under CEQA, this is a justified mitigation measure and is required, barring infeasibility.

The DEIR/EA doesn't state that construction of this sound wall is infeasible. Instead, it concludes that construction of the sound wall is "unreasonable." A finding of "unreasonable" is not adequate under CEQA.

Even assuming that the DEIR/EA were on the right track, its method of calculating unreasonableness is to assume a base value for the sound wall abatement of \$31,000 per residence. Adding factors such as age of homes and achievable noise reduction, the total "reasonable allowance per residence" for each Fernald Point Lane home is \$49,000. Although we do not agree with the use of a base figure of \$31,000 is appropriate for multi-million dollar ocean front homes, as we state above, for the sake of discussion we will use that figure. The sound wall proposed, and rejected, between the Project and Fernald Point Lane, designated as S471, is estimated to cost \$1,067,940. The "calculation of reasonable allowance" for the Fernald Point Lane neighborhood that would benefit from S471 is \$784,000 because the study assumed that only 16 homes would benefit. The DEIR/EA uses the figure of 18 benefited homes without explaining why this figure differs from the calculation sheet in Appendix E. Either way, both calculations are flawed because they grossly under-count the number of benefited residences and, as a result, are incorrect. There are twenty-six (26) separate parcels on Fernald Point Lane that will be benefited by construction of S471. One of these, at the far west end of S471 would have only partial benefit because of the intersection of an existing sound wall and S471, leaving a gap at the railroad tracks, but it still will benefit. If we do not count that westerly property, 25 residences and residential building sites (there are two lots that are vacant but are buildable with one having a residence pending) will benefit from S471. Multiplying 25 residences (rather than 16 or 18) times \$49,000 equals \$1,225,000, an abatement valuation that exceeds the sound wall construction costs and makes the sound wall "reasonable" by Caltrans standards.

Even assuming that the calculations in the DEIR/EA were correct, the DEIR/EA includes no project alternative whereby the residents of Fernald Point Lane would be offered the opportunity to contribute toward the shortfall between the cost of S471 and the actual total reasonable allowance for all residences benefited by the wall. This is a fatal flaw.

The CEQA analysis for the noise impacts upon Fernald Point Lane residences not only is flawed, but improperly applies non-CEQA standards to the mitigation requirements. The Project clearly will have significant noise impacts upon Fernald Point Lane residences, impacts that feasibly can be mitigated through construction of S471. This sound wall must be constructed because there is no rational basis for a statement of overriding considerations, particularly because the author of the noise study simply mis-counted the impacted residences in this neighborhood.

The noise analysis in the DEIR/EA also concludes that the noise impacts upon residences along portions of Padaro Lane do not merit construction of a sound wall. One of these soundwalls is S257. The other is S281. This letter focuses on S257, but the same principles apply to S281. The two walls would overlap because of the intervening ramp, but together they provide overlapping benefits.

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The "calculation of reasonable allowance" in Appendix E for noise abatement for the residences benefited by S257 assumes a justifiable abatement allowance of \$45,000 per residence, with 12 residences benefited, yet the DEIR/EA states that 24 residences are impacted. Again, the document doesn't explain this discrepancy. As noted above, this abatement allowance is not justified by any rational or reasonable standard. It is arbitrary and capricious. The DEIR/EA estimates that the construction cost for S257 is \$1,438,000, with the calculated total abatement allowance being only \$540,000. If the correct total of affected residences were used – 24 – the total abatement allowance would be \$1,080,000. The difference between the noise abatement allowance total and the sound wall cost is less than \$400,000. The DEIR/EA analysis projects that existing noise levels for this neighborhood range from 54 dB to 66 dB, a range that changes to 56 dB to 67 dB with the Project. As noted above, 65 dB is the County of Santa Barbara's threshold of significance for noise impacts on residential exterior living areas and 67 dB is the Caltrans threshold of significance for these same areas. Given the reality that the calculated abatement allowance is pitifully low for these multi-million dollar ocean front homes and the disparity between the total calculated abatement allowance and the wall cost is low when compared to the enormous benefit to these homes from a sound wall, there is no justification in the DEIR/EA for not mitigating what is a significant, mitigable impact.

As noted above for Fernald Point Lane, the DEIR/EA includes no project alternative whereby the residents of Padaro Lane would be offered the opportunity to contribute toward the shortfall between the cost of S257 and the actual total reasonable allowance for all residences benefited by the wall. This is a fatal flaw.

The same analysis should be applied to S281 because the information included in the DEIR/EA demonstrates that the Project will have significant impacts upon the residences located in the portion of Padaro Lane that would be benefited by S281.

Natural Biological Communities

The Natural Communities analysis (pp. 350-354) generally describes various natural communities within and around the Project area but provides no source for this information. How and when was this information obtained? Was a qualified biologist involved in surveying the Project area? All of the information provided regarding natural communities is in text format and is very general. It is not adequate to allow the reader to understand the existing conditions or what impacts may result from the Project. A map of the communities and specific information including the location, acreage and continuity of the various communities is necessary.

The discussion of riparian areas (pp. 351-352) indicates that 10 coast live oaks and 19 arroyo willows would be removed from riparian areas during construction. However, the analysis provides no context for the proposed removals. How many trees currently exist within riparian areas and within the Project area as a whole? What are their sizes? What percent of total trees and of each tree species are proposed to be removed within each riparian area? Within the Project area as a whole? Again, a map is needed to adequately depict the potential impact of the proposed removals.

The analysis of riparian areas and coast live oaks (pp. 351-353) addresses trees proposed for removal, but does not address potential impacts to trees not proposed for removal. Are there any potential impacts to trees that are not proposed for removal? If so, what is the extent of the impacts and if applicable, how would these be mitigated.

The coast live oaks subsection of the analysis (pp. 352-353) alludes to a replanting plan being coordinated as part of a recommendation of the Memorial Oaks Focus Group, but provides no information about this replanting plan. How many Memorial Oaks are proposed for removal? Where

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would replanting occur? Would replanting be a required mitigation measure? To what extent does replanting mitigate the impact of the proposed removals?

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The Project should include a mitigation measure and/or condition requiring that riparian area tree removals may not occur between February 15 and September 1 unless a biological survey is performed to ensure the removals would not impact nesting birds. Not including such a requirement would result in potentially significant impacts to nesting birds.

The third bullet in the riparian subsection of the Avoidance, Minimization, and/or Mitigation Measures section (pp. 353-354) states that although higher replacement ratios are sometimes appropriate, a replacement ratio of 3:1 is proposed for willows, 3:1 for coast live oaks and sycamores greater than 6 inches in diameter at breast height, and 1:1 for Monterey cypress and Monterey pine. Did a qualified arborist evaluate the Project and proposed removals in coming to the conclusion that lower replacement ratios were appropriate? What size replacement trees will be required? The text includes a statement that county flood control actively manages the state right-of-way along the creeks. Will county flood control be responsible for implementing and monitoring the success of tree replacements?

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The statement, "If replacement ratios cannot be met at these locations due to flooding concerns, planting would occur at other appropriate locations within the state right-of-way" (p. 353) should be included with the third bullet rather than the fourth as it addresses tree replacement ratios which are the subject of the third bullet.

What steps will Caltrans take if riparian tree and/or shrub replacement is not successful?

The fourth bullet in the coast live oaks subsection of the Avoidance, Minimization, and/or Mitigation Measures section (p. 354) states that replacement plantings would be achieved in accordance with the Santa Barbara County Draft Guidelines for Urban Oak Trees (2006) by using a 3:1 ratio for each tree removed. These guidelines also require a minimum size of 24" boxed trees. Will this standard also be met? If so, it should be specified. If not, the minimum size proposed should be specified. Additionally, the Santa Barbara County Draft Guidelines for Urban Oak Trees were last updated in February 2007. The analysis should be updated to evaluate compliance with the most recent version of these guidelines.

The coast live oaks subsection of the Avoidance, Minimization, and/or Mitigation Measures section (p. 354) ends with the statement that "[i]t is recommended that native tree and shrub species such as western sycamore, lemonade berry, toyon, laurel sumac, and coyote brush also be included as replacement plantings." However, there is no analysis of how much of this area would be removed as part of the Project or whether the proposed removal would result in a significant impact under CEQA. If a significant impact would result, the specific amount of replacement plantings and locations must be specified in order to adequately mitigate the impact.

The analysis of Natural Communities discusses trees to be removed in riparian areas and coast live oaks to be removed outside of riparian areas. What other native trees are proposed to be removed outside of riparian areas?

Wetlands and Other Waters

While the Affected Environment section of the Wetlands and Other Waters analysis (pp. 356-360) refers to the differing definitions of wetlands in the Clean Water Act and Coastal Act and references the definitions in the Regulatory Section (pp. 355-356), the Regulatory Section only discusses the definition

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of wetlands pursuant to the Clean Water Act. The definition of wetlands pursuant to the Coastal Act should also be explained in the Regulatory Section.

The Affected Environment analysis (pp. 356-360) only describes impacts for some of the creeks and wetlands discussed. This analysis must describe and analyze the impact of the Project on all of the creeks and wetlands within the Project area.

The Environmental Consequences text describes the aggregate impacts to jurisdictional wetlands, but does not provide adequate information to explain where the impacts would occur. A map showing the impacted areas is needed so that the reader can fully understand the impacts of the proposed Project.

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The Avoidance, Minimization, and/or Mitigation Measures section (pp. 383-385) provides a "range of compensatory mitigation that may be required." As stated in comments above, CEQA Guidelines § 15126.4(a)(1)(B) requires that formulation of mitigation measures may not be deferred until some future time. Where it is not possible to specifically define mitigation, performance standards which would mitigate the impact may be established. How was this range determined? How would the actual amount of compensatory mitigation needed to mitigate the impact be determined? When would this be determined? Further, CEQA Guidelines § 15126.4(a)(2) requires mitigation measures either be incorporated into the design of the Project or be fully enforceable through conditions, agreements, or other means. Identifying mitigation that "may be required" with no clear explanation of how or when the determination of exactly what mitigation will be required will occur is not adequate mitigation pursuant to CEQA.

The first paragraph of the Avoidance, Minimization, and/or Mitigation Measures section (p. 383) states that restoration in areas of temporary impacts would be required but that these requirements are not represented in the table provided in this section. Where is the information regarding restoration of temporary impacts? What mitigation is proposed?

Animal Species

The Animal Species analysis (pp. 386-387) states that it addresses wildlife not listed or proposed for listing under the state or federal Endangered Species Act, but goes on to include steelhead trout in the list of wildlife observed within the biological study area. Steelhead trout are a federally listed endangered species.

The Environmental Consequences section (p. 387) states that the Project may impact nesting swallows, which would violate the Migratory Bird Treaty Act. Other migratory birds protected by the act which have been observed in the biological study area, pursuant to the list on p. 386, include the American kestrel, turkey vulture, mourning dove, Brewer's blackbird, American crow, mallard duck, Anna's hummingbird, house finch, red-winged blackbird, great blue heron, black phoebe, northern mockingbird, northern flicker, common yellowthroat, lesser goldfinch, brown-headed cowbird, and bushtit. Harassment or harm to any of these birds would be a violation of the Migratory Bird Treaty Act and therefore a significant Project impact which must be mitigated.

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Additionally, the CEQA analysis of significant impacts to biological resources (p. 432) fails to address impacts to migratory birds and the CEQA Checklist (Appendix A) incorrectly indicates that impacts would be less than significant (Item IV.d).

Even though the Affected Environment section (pp. 386-387) lists numerous species besides birds that have been observed in the biological study area, the Environmental Consequences section (p. 387)

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only addresses nesting swallows. Were potential impacts to other species analyzed? What, if any, impacts to other animal species could result from the Project?

The Avoidance, Minimization and/or Mitigation Measures section (p. 387) provides a procedure for inspecting all nests to ensure that no birds are using them if construction is to occur during nesting season, but does not address what will occur if nests are being used.

Threatened and Endangered Species

The Affected Environment section of the Threatened and Endangered Species analysis (pp. 388-390) identifies numerous species which have the potential to occur within the Project area. The text goes on to list several of these species which were not found within the Project limits. When were these species "not found?" Were surveys done? If so, when and by whom? Is the reader supposed to conclude that the other species identified as having the potential to occur in the Project area were found during some unidentified survey(s)?

The analysis goes on to identify potential impacts to steelhead trout and tidewater goby (pp. 389-390) but does not address many of the other species identified as potentially impacted by the Project including the western pond turtle, light footed clapper rail, Belding's savannah sparrow, southwestern willow flycatcher, least Bell's vireo, California least tern, or western snowy plover. What impacts to these species could result from the Project and if applicable, what mitigation is proposed?

Impacts to steelhead trout and tidewater goby and any other identified impacts to threatened and/or endangered species must also be addressed in the Biological Resources subsection of the CEQA significant impact analysis (p. 432).

The CEQA Checklist (Appendix A) does not accurately reflect the analysis of impacts to steelhead trout and tidewater goby. The project would result in significant impacts to these protected species and as such, must be mitigated (Item IV.a).

The Threatened and Endangered Species analysis fails to address the potential for both short-term and long-term noise impacts of the Project on the threatened and endangered species.

The analysis indicates that the Project would impact tidewater goby movement and critical habitat for steelhead trout. However, the mitigation identified in the Avoidance, Minimization and/or Mitigation Measures section does not commit Caltrans to many of the identified measures because the measures use the term "should" rather than shall (pp. 394-396). As stated above, CEQA Guidelines § 15126.4(a)(2) requires mitigation measures either be incorporated into the design of the Project or be fully enforceable through conditions, agreements, or other means. Use of the term "should" does not comply with this requirement because the mitigation would not be fully enforceable.

Additionally, substantial interference with the movement of steelhead trout and tidewater goby must be identified as a significant impact in the CEQA analysis of biological resources (p. 432) and in the CEQA Checklist (Appendix A, Item IV.d).

One of the measures proposed to mitigate impacts to steelhead trout critical habitat (third bullet, p. 394) states that "San Ysidro Creek is typically dry at the state highway crossing by May 1 each year and remains dry until November." This measure should also state that if it is not dry at the time construction is to occur, water diversions would be required.

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Construction Impacts

The description of bicycle and pedestrian routes (p. 397) provides the total length of bikeways in the entire county of Santa Barbara and the length in the South Coast. This is so broad as to be irrelevant to this specific Project. What is the extent of the bikeway within and around the Project area? What pedestrian routes exist within and around the Project area?

The Utilities/Emergency Services subsection of the Environmental Consequences section (p. 400) generally states that the Project would potentially impact emergency service providers during construction but does not provide any specifics as to the scope and extent of such impacts. Would response times be reduced? Would this be for both police and fire? If so, by how much would response times be reduced and for how long?

The CEQA analysis in Chapter 3 must also address the identified impacts to emergency services. Since the analysis on p. 400 indicates that there would be some impact to emergency services, the conclusion in the CEQA Checklist (Appendix A, Item XIV.a) that the Project would have no impacts with respect to this issue area is inaccurate and should be revised.

The Avoidance, Minimization, and/or Mitigation Measures section misplaces the proposed mitigation for impacts to emergency services under Traffic and Transportation/Pedestrian and Bicycle Facilities rather than Utilities and Emergency Services (p. 408). Additionally, the proposed mitigation for impacts to emergency services only provides "[m]easures would be taken to avoid impacts to impacts to emergency services with alternate routes made available during construction." As stated above, the analysis does not explain what impacts, such as delayed response times, would occur. The proposed mitigation does not explain the extent to which potential response time delays would be mitigated. As such this analysis and the proposed mitigation is inadequate and should be revised.

The Traffic and Transportation/Pedestrian and Bicycle Facilities subsection of the Environmental Consequences section (pp. 400-402) indicates that "consideration would be given" to address impacts to bicycles, pedestrians and persons with disabilities during construction. However, neither this section nor the Avoidance, Minimization and/or Mitigation section addresses what type of "consideration" would be given.

The second to last sentence of the Water Quality subsection of the Environmental Consequences section (p. 402) states "the following analysis assumes a very conservative amount of soil disturbance and asphalt and concrete usage," but fails to provide any such analysis.

The Shade Canopy subsection of the Environmental Consequences section (p. 403) states that removal of trees that currently provide riparian shade may temporarily cause warming of surface waters, potentially impacting wildlife using these areas and other beneficial uses. However, the explanation does not quantify how much canopy would be removed or in what locations. The analysis further does not explain why this impact would only be temporary. Are replacement trees proposed in the same locations? If so, how long would it take for the replacement trees to replace the removed canopy? Can this impact be fully mitigated within a reasonable amount of time?

Does the air quality analysis (pp. 403-405) consider the various Cabrillo Boulevard/Hot Springs interchange alternatives? These appear to require substantially different amounts of construction time which would likely affect the level of air quality impacts.

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The Environmental Consequences section (pp. 400-408) identifies construction impacts related to Erosion, Chemical Releases, Shade Canopy, Groundwater Hydrology and Other Waters but fails to provide any mitigation for these impacts.

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The Environmental Consequences section fails to address potential impacts to wetlands and sensitive species.

Cumulative Impacts

Some of the mitigation measures identified to address the significant cumulative impacts to visual resources are not adequate pursuant to CEQA. Specifically, bullet 11 on p. 465 provides that "Concrete median barriers and new soundwalls in the immediate vicinity of the Memorial Oaks should include aesthetic treatment unique to the Memorial Oaks area" (emphasis added). This mitigation measure must be enforceable, thus the word "should" must be replaced with "shall."

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Bullet 13 on p. 465 states that "[a]ll aesthetic planting would use larger-container-size plant material." Mitigation must be specific, thus, specific minimum container sizes for various types of plants must be identified. The bullet goes on to provide that "[t]rees would be planted from, at minimum, 15-gallon containers." The County of Santa Barbara's standard for replacement trees in urban areas is a minimum 24" box pursuant to its draft Urban Oak Tree Interpretive Guidelines. The mitigation should either be revised to require minimum 24" box-sized trees or the analysis should provide an explanation as to why 15-gallon containers are appropriate.

IV. CEQA Evaluation

While the CEQA Checklist (Appendix A) identifies numerous issue areas that require mitigation (and we have identified several other areas where mitigation is required in this comment letter), the only mitigation measures listed in Chapter 3 are those related to visual/aesthetic resources. Pursuant to CEQA Guidelines § 15123(b) an EIR to contain a summary identifying "each significant effect with proposed mitigation measures and alternatives that would reduce or avoid that effect."

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The CEQA Evaluation fails to address mandatory findings of significance as required by CEQA Guidelines § 15065.

The CEQA Evaluation fails to address impacts to utilities and service systems even though the CEQA Checklist (Appendix A) identifies potentially significant impacts that require mitigation.

While we agree that the project would not likely impact the population and housing issue area, CEQA requires that the document include a statement to this effect.

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V. Conclusion

Thank you for the opportunity to comment on this DEIR/EA. As set forth in abundant detail above, the DEIR/EA includes many sections that simply do not comply with CEQA requirements for an adequate disclosure document. Of particular concern to our clients is the faulty noise analysis. It has so many fundamental flaws that only a complete revision and recirculation of the document will remedy the flaws. Either that, or a revision in the conclusions such that the three (3) described sound walls **are** included in the Project and an alternative be considered that includes, where appropriate, an option for a partial financial contribution by impacted property owners who elect to make that contribution. Either way, the DEIR/EA requires significant revisions and recirculation unless our clients are satisfied that sound walls will be provided for their neighborhoods.

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Sincerely,



Susan F. Petrovich

cc: Supervisor Salud Carbajal

SB 617814 v1:030009.0117

Behrens and Associates, Inc.
Environmental Noise Control

July 9, 2012

Susan Petrovich
Brownstein Hyatt Farber Schreck, LLP
21 East Carrillo Street
Santa Barbara, California 93101-2706

Subject: Caltrans Noise Study Review

Dear Ms. Petrovich,

As requested, we have conducted a review of the noise study for the South Coast 101 HOV Lanes for the section of the freeway that passes Fernald Point Lane in Santa Barbara County.

The noise study for the project was prepared by Parsons in March 2010. The methodology used in this study followed the Caltrans Traffic Noise Analysis Protocol for New Highway Construction, Reconstruction and Retrofit Barrier Projects (2006), which was current at the time the study was prepared. The protocol has since been updated and was most recently revised in May 2011.

A sound wall was considered in the study on the south side of the freeway as a barrier between the freeway and the residences on Fernald Point Lane. This wall, designated S471, was proposed to extend from Station 461+35 to Station 481+00.

Review of South Coast 101 Traffic Noise Model

The noise modeling for the project was performed using the Federal Highway Administration's Traffic Noise Model (TNM) 2.5 software. This is a three-dimensional noise modeling package that takes into account various factors affecting the traffic noise including traffic volumes, truck mix, the speeds of vehicles, the shape and absorptive properties of the terrain and barriers between the traffic and noise-sensitive receptors.

The model was calibrated using a single noise measurement obtained at 11:04 am on March 19, 2009 at 1755 Fernald Point Lane in combination with simultaneous vehicle speed measurements and a traffic count on the freeway. The measured average noise level (L_{eq}) at this calibration point was 62.7 dBA. The noise level predicted by the TNM model was 65.9 dBA. To account for this 3.2 dB deviation, a -3.0 dB correction was applied to one or more modeled receiver points in the model (each representing a group of residences) along Fernald Point Lane.

The reason provided in the noise study for the 3.2 dB deviation is the complicated terrain between the freeway and the calibration point. The report does not mention wind effects as a possible cause of the deviation; however examination of data collected by a nearby weather station indicates a 9 mph wind was blowing from the southeast at the time the measurement was obtained. This data indicates the

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Brownstein Hyatt Farber Schreck, LLP
July 9, 2012
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measurement location was upwind of the freeway. Caltrans Technical Noise Supplement, 2009, states that 'A 6-mph cross wind can increase noise levels at 250 feet by about 3 dBA downwind and reduce noise by about the same amount upwind'. The measurement location at 1755 Fernald point Lane was approximately 200 feet from the edge of the freeway and 250 feet from the center of the freeway; therefore the wind condition during the measurement may explain the 3.2 dB deviation rather than the complicated terrain.

The Technical Noise Supplement further states that 'Present policies and standards ignore the effects of wind on noise levels. Unless winds are specifically mentioned, noise levels are always assumed to be for zero wind. Noise analyses are also always made for zero-wind conditions'. It is our opinion that the 3.2 dB deviation could have been reasonably attributed to wind conditions and that the model would have been more accurately representative of zero-wind conditions if the 3 dB correction had not been applied. The noise report's stated noise levels for receivers along Fernald Point Lane could therefore be 3 dB lower than the actual noise level.

Two of the receivers in the TNM model, designated R74B and R75, are predicted to have design year noise levels of 72 to 73 dBA, depending on the road configuration. Although it is standard practice to apply correction factors to receiver points close to the calibration point in the model, it is not known whether the -3 dB correction factor was applied to receivers R74B and R75. An increase of 3 dB to these predicted levels would cause them to exceed the 75 dBA threshold above which receivers are considered 'severely affected'. It is recommended that verification of the receivers to which the correction factor was applied and confirmation that the uncorrected predicted noise levels do not exceed the 75 dBA threshold is performed by the preparer of the noise study.

The model created for this project in the TNM software assumes a default ground absorption equivalent to grass at all locations. This ground absorption does not appear suitable for modeling the area along Fernald Point Lane due to the fact that this road is paved and is therefore more reflective than grass. Adding paved zones to the model would have increased the modeled noise levels along the road.

The TNM model adds additional noise attenuation along the road with a 'tree zone' between Fernald Point Lane and the freeway. It is our opinion that inclusion of this zone conflicts with the FHWA policy provided with the software, which states that "Such zones should consist of long, wide regions of heavy, non-deciduous woods and undergrowth, not just individual trees or several rows of trees. The vegetation also must be sufficiently dense to completely block the view along the sound propagation path. This requires dense undergrowth as well as dense tree-top foliage. "Tree zones" should not be modeled unless they have this vegetative density". Our inspection of the site revealed that the modeled tree zone appears to have been put into the model to represent only 1 or 2 rows of trees that contain many gaps, deciduous trees and does not contain dense undergrowth. The freeway is clearly visible through these tree rows along Fernald Point Lane.

Behrens and Associates, Inc.
Environmental Noise Control

July 9, 2012

Susan Petrovich
Brownstein Hyatt Farber Schreck, LLP
21 East Carrillo Street
Santa Barbara, California 93101-2706

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July 9, 2012
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Behrens and Associates, Inc.

Environmental Noise Control

Brownstein Hyatt Farber Schreck, LLP

July 9, 2012

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It is noted that the calibration measurement for the traffic model was not obtained during the peak noise hour at the calibration point on Fernald Point Lane. While the Caltrans Technical Noise Supplement permits non-peak hour measurements, Environmental Impact Reports base their analyses on reasonable worst-case conditions. Obtaining noise measurements during the noisiest hour on Fernald Point Lane would have reduced the potential for errors in the calibration of the model.

Determination of Wall Allowance

The project's noise study determined that the wall is feasible, meaning that it will reduce noise levels by at least 5 dB at impacted receivers. However, the wall was not considered reasonable, meaning that the cost to build the wall exceeds the benefit of building it. The reasonableness assessment is based on an allowance per benefited residence. The 2006 protocol uses an allowance that is calculated based on the existing and predicted design year noise levels, the noise reduction achieved by the wall and the cost of building the walls in relation to the overall cost of the project. The report identifies 16 to 18 homes that would be benefited by the noise barrier, depending on which of the alternative designs is chosen. The calculated allowance was \$49,000 per residence for an 8 to 14-foot high barrier, which gives a total allowance for the wall of \$784,000 for the configuration that benefits 16 residences and \$882,000 for the configuration that benefits 18 residences.

The environmental report for the project states an estimated cost of \$1,067,840 of the wall, which is greater than the allowance for either configuration.

The latest Caltrans Traffic Noise Analysis Protocol (dated May 2011) contains a simpler allowance calculation based on a flat rate of \$55,000 per residence. Using the latest protocol, the allowance is calculated as \$880,000 for the configuration benefiting 16 homes and \$990,000 for the configuration benefiting 18 homes. It is not known how these values compare to an updated cost estimate for the wall.

It is noted that the above allowances are calculated based on number of houses on Fernald Point Lane stated in the noise study. The study indicates that a total of 21 residences lie between San Ysidro Creek and the east end of Fernald Point Lane. These residences are associated in varying quantities with receivers R74, R74A, R74B, R75, R76, R77, R77A, R78 and R78A. Our review of the site indicates that there are at least three more properties with boundaries that lie within 500 feet of the freeway and could reasonably be included in the study. Comparison of the position of the noise model receivers with the locations of the residences indicates that the likely missing properties are:

- The vacant strip of land between 1787 and 1801 Fernald Point Lane. It is understood that this strip was recently separated from no. 1787 and will be developed into a residence.
- 1745 Fernald Point Lane, which is a second row property and has a boundary that lies within 500 feet of the freeway.

Behrens and Associates, Inc.

Environmental Noise Control

Brownstein Hyatt Farber Schreck, LLP

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- 1661 Fernald Point Lane. This house shares a driveway with 1665 and may have been missed in the noise study.

It is noted that wall S471 is unlikely to reduce the noise level at no. 1661 by 5 dB due to this property being located at the very end of the wall. However, a 5 dB reduction may be possible at the vacant site and at no. 1745. Inclusion of these two properties in the analysis would likely increase the number of benefited properties to up to 20. A recalculation of the total allowance using the 2011 value of \$55,000 per receptor gives \$1,100,000 if all 20 receptors are included.

No recent cost calculation for the wall is known to us. It is likely that inclusion of two additional benefited receptors into the allowance calculation will bring the total allowance relatively close to an updated wall cost and it is possible that the allowance may exceed this cost, meaning that the wall would be considered both feasible and reasonable according to the latest Caltrans protocol.

Please contact the undersigned with any questions or comments.

Very truly yours,



Thomas Corbishley
Acoustical Engineer

Behrens and Associates (Attachment to letter from Susan Petrovich, Brownstein Hyatt Farber Schreck, LLP)

General Response

The Noise Study Report for the project indicates that when the noise measurements were taken near 1755 Fernald Point Lane, the weather conditions were described as calm winds (see Appendix F of the Noise Study Report). The Federal Highway Administration Technical Noise Supplement recommends that highway noise measurements should not be taken at wind speeds above 12 miles per hour. Wind speeds above 12 mph will interfere with micro phone readings of the meter. The noise protocol and FHWA protocol does not allow for wind speed adjustments and noise measurements should be taken under calm winds (less than 5 m/s). If any readings are taken above this wind speed the measurements are considered contaminated.

The model calibration is applied to compensate for physical field conditions that tend to dampen noise levels from the freeway and cannot be effectively modeled as numerical variables. Calibration is sometimes necessary for locations containing extremely dense vegetation along the State right-of-way, unique topography, or structures between the freeway and a sampling location. There is uneven terrain between 1755 Fernald Point Lane and the highway itself. This physical condition could explain the variations between the modeled noise level and field noise level. For this reason, model calibration was used to compensate for that variation. To determine the calibration value, the traffic volume present at the time the field noise levels are taken is used as the traffic volume input for the model run. The difference between the theoretical noise volume and the actual noise volume determines the magnitude of the calibration (or sound attenuation) assumed to be attributed to the physical field conditions. The methodology assumes this attenuation remains constant with varying traffic loading of the freeway. If the predicted sound levels are within 2 dB of the measured sound levels,

they are considered to be in reasonable agreement and no calibration of the model is to be made.

The Noise Study Report prepared for this project states that residences near Fernald Point Lane are separated from the highway by trees and grass. Caltrans agrees that the existing vegetation is not dense enough to cause a major attenuation for noise. For that reason, the tree zone coding was removed from the model, changing the results by 0.8 dBA, an amount that wasn't enough to change the conclusion regarding the soundwall decision.

Brownstein Hyatt Farber Schreck, LLP (Susan Petrovich)

Comment 1 Availability of Draft Environmental Document

On the inside cover of the draft environmental document, there is a "General Information About This Document" heading and under that is titled "What should you do?" The first bullet notes that hard copies of the document and technical reports are available at the Caltrans District office. The third bullet provides a contact where hard copies of the information can be requested. Also included in that section are addresses of four local libraries in the project area where a hard copy of the environmental document and a compact disk of the technical studies were available for review.

A link (http://www.dot.ca.gov/dist05/projects/sb_101hov/index.html) to the environmental document was provided in the Notice of Availability, the Public Notice for the Public Hearing, and the Public Notice advising of the comment period extension; these notices appeared in several newspapers in the area: *Daily Sound*, *Coastal View News*, *Montecito Journal*, and the *Santa Barbara Independent*.

An electronic copy of the environmental document and accompanying technical reports were also easily available when searching the District 5 website or Santa Barbara County Association of Governments website. The

document and studies were uploaded March 25, 2012 and remain online today.

The link to the Environmental Impact Report/Environmental Assessment and technical reports is:

http://www.dot.ca.gov/dist05/projects/sb_101hov/index.html.

Brownstein Hyatt Farber Schreck, LLP

Comment 2 Summary Impact Table

The Summary table is a California Environmental Quality Act requirement for potentially significant impacts identified in the Environmental Impact Report, per California Environmental Quality Act Guidelines §15123. Under the National Environmental Policy Act, an Environmental Assessment does not have this requirement. Therefore, the Summary table included only the potentially significant impacts under the California Environmental Quality Act.

The Summary table has been modified in the final environmental document. Based on your comments, the Summary table is now divided into two tables. Table S.1 summarizes impacts that are less than significant; Table S.2 summarizes impacts that are significant without mitigation and also includes the impacts that cannot be mitigated. The proposed measures were also added to Table S.2. It should be noted that although these revisions make it clearer in the summary of the final environmental document, the information was contained within Chapters 2 and 3 of the draft environmental document and was therefore available for public review and consideration.

The California Environmental Quality Act checklist (Appendix A) identifies project impacts that are significant but mitigable and impacts that are significant but not capable of being fully mitigated. The full discussion of impacts in Chapter 2 follows the checklist order, allowing the reader to easily cross-check the significance level against the impacts and measures. In

addition, the California Environmental Quality Act Evaluation (Chapter 3) provides discussion of significant impacts on resources and notes that are less than significant (Section 3.2.1), significant (Section 3.2.2), or unavoidable significant impacts (Section 3.2.4). These sections provide all required information for an Environmental Impact Report. It should be noted that several areas in the checklist were revised between the draft and final environmental document. Those items have been identified as changed with a line in the margin.

Brownstein Hyatt Farber Schreck, LLP

Comment 3 HOV Lanes and Off-ramps

Traffic studies were performed as part of the initial design analysis; the proposed project meets all current AASHTO (American Association of State Highway and Transportation Officials) requirements for design and safety, which include highway exit spacing and sign placement. The project proposes a contiguous HOV lane that allows drivers to enter and exit at any point. However, drivers who are anticipating an upcoming exit are required to be in the far right lane(s) to avoid abrupt lane changes. In accordance with safe driving practices, drivers who miss their exit must proceed to a subsequent exit and backtrack to their destination.

Brownstein Hyatt Farber Schreck, LLP

Comment 4 Montecito Community Plan View Corridors

The Visual/Aesthetics section in the draft environmental document included seven Observer Viewpoints through Montecito, from the highway and from the surrounding community. The related analysis documented and disclosed the type and extent of visual impacts to Montecito's scenic vistas, visual resources and community character. The draft environmental document acknowledged a high degree of viewer sensitivity through Montecito based in large part on review and understanding of the Montecito Community Plan policies. Applicable visual policies from the Montecito Community Plan are

cited and included in the analysis; existing visual conditions are discussed, and the proposed project is thoroughly presented and disclosed in map form, text narrative, illustrations and simulations.

The analysis and photo-simulations included in the draft environmental document appropriately show proposed landscaping, landscape removal, wall locations, wall aesthetics and other features based on Caltrans and Federal Highway Administration standards. Where warranted due to potential significant visual impacts, specific mitigation measures are recommended, including increased planting, increased aesthetic treatment, and so on.

Soundwalls were studied and recommended based on the Caltrans noise protocol. Special treatment cannot be provided to properties with higher valued real estate. Furthermore, to protect quality ocean views, Soundwalls S392 and S374 were not recommended for construction due to severe visual impacts and were not recommended for construction by the Project Development Team.

Brownstein Hyatt Farber Schreck, LLP

Comment 5 Soundwalls

A Noise Abatement Decision Report was prepared for the project to estimate the construction cost for the feasible noise abatement measures identified in the Noise Study Report and determine if noise abatement is financially reasonable per Caltrans 2006 Noise Protocol. The overall reasonableness of noise abatement is determined by many factors. Main factors that affect reasonableness include the cost of noise abatement, absolute noise levels, existing noise versus design-year noise levels, achievable noise reduction, date of development along the highway, life cycle of noise abatement measures, and environmental impacts of abatement construction. Cost considerations for determining noise abatement reasonableness are evaluated by comparing reasonableness allowances and projected costs. In addition, considering the

value of the home the soundwall protects would conflict with environmental justice policies. See Volume I, Section 2.2.7, for more information on criteria for determining when an abatement measure is reasonable and feasible.

As a result of the project's small increases in noise levels, the California Environmental Quality Act determination in Section 2.2.7 concludes that the noise impacts associated with the proposed build alternatives are less than significant and do not require mitigation. Noise-attenuating measures proposed with this project—such as soundwalls—are not considered mitigation but proposed as abatement under the federal noise protocol.

Brownstein Hyatt Farber Schreck, LLP

Comment 6 Coastal Zone

The Federal Consistency Unit of the California Coastal Commission implements this action. The project will be consistent with this requirement once it obtains a Local Coastal Plan Amendment from Santa Barbara County and the City of Carpinteria and once it obtains Coastal Development Permits from the three local jurisdictions (Cities of Santa Barbara and Carpinteria, and the County of Santa Barbara).

Brownstein Hyatt Farber Schreck, LLP

Comment 7 Consistency with Local Plans

To address your comment, Table 2.2 and the *Environmental Consequences* discussion in Section 2.1.1.2 of the final environmental document have been updated to more accurately reflect the wetland buffer requirements. The minimization and mitigation measures are included for visual impacts (Section 2.1.6 and Appendix F of the Draft/final environmental document); wetland and creek impacts are shown in Sections 2.3.1 and 2.3.2. All impacts are mitigated to a level that is less than significant under the California Environmental Quality Act except for visual impacts and cumulative visual impacts, both of which are considered significant and cannot be fully

mitigated. The California Environmental Quality Act determination of significance in this document is based on the measures contained in the document. Any additional measures required under a Local Coastal Plan Amendment or Coastal Development Permit process are considered project enhancements, but are not required mitigation under the California Environmental Quality Act. Caltrans will seek amendments to the Local Coastal Plans that will apply only to activities directly associated with specific projects. The amendments would not apply to future development.

Brownstein Hyatt Farber Schreck, LLP

Comment 8 Local Coastal Plan Amendment

The draft environmental document listed policy inconsistencies in Table 2.2. The section was updated in the final environmental document. The project is inconsistent with wetland and riparian buffers required under the Local Coastal Plans for the City of Carpinteria and the County of Santa Barbara. An amendment to both Local Coastal Plans will be required before either jurisdiction can find the project consistent and consider a Coastal Development Permit. The local jurisdictions will have future opportunities to provide feedback during the Local Coastal Plan Amendment and Coastal Development Permit processes.

Brownstein Hyatt Farber Schreck, LLP

Comment 9 Local Coastal Plan Amendment

The project mitigates for permanent impacts to sensitive habitat areas, provides storm water treatment for environmentally sensitive areas, and offsets corresponding temporary impacts. Therefore, the project was found to be consistent with coastal policies relative to environmentally sensitive habitat areas. The minimization and mitigation measures to address impacts to riparian areas, wetlands, and creeks are found in Sections 2.3.1, 2.3.2 and 2.3.4 of the environmental document.

In addition, the project requires a Coastal Development Permit from three jurisdictions, which will lead to further reviews of related issues.

Brownstein Hyatt Farber Schreck, LLP

Comment 10 Land Use Consistency

The California Environmental Quality Act checklist has been revised in the final environmental document so that the box marked is “Less than significant impact with mitigation.” A brief Local Coastal Policy Consistency discussion has also been added to Chapter 3 of the final environmental document under Biological Resources.

Brownstein Hyatt Farber Schreck, LLP

Comment 11 Coastal Zone

The California Coastal Commission is charged with making a federal consistency determination for proposed development projects. The Local Coastal Plan for each community forms the basis for the Coastal Commission Consistency determination. Because the South Coast 101 HOV Lanes project is subject to the requirements of three separate local coastal plans, there will be a consistency analysis required for each during the local Coastal Development Permit process.

Brownstein Hyatt Farber Schreck, LLP

Comment 12 Traffic Impacts

The section describing collision rates has been updated in Section 2.1.5 of the final environmental document. The higher total collision rate can be attributed to unstable traffic flow caused by congestion. The northbound accident rate within the project limits was 47% higher than the statewide average for similar four-lane urban freeways. For southbound U.S. 101, the data indicates that the total actual collision rate per million vehicle miles was less than the average rate for similar highway segments.

Of the 900 accidents total, 594 collisions or 66% were rear-end collisions; 77 collisions or 9% were sideswipe collisions; and 192 collisions or 21% were hit object collisions. Most of the accidents were congestion related at 96% of all collisions, consisting of the “rear end,” “sideswipe,” and “hit object” types of accidents. Because the project purpose is to reduce congestion, these rates of accidents on the freeway mainline are expected to drop.

Accident rates for the northbound Hermosillo Road off-ramp, the northbound Cabrillo Boulevard median left off-ramp, the southbound Cabrillo Boulevard left off-ramp, and the southbound Los Patos Way off-ramp are all above the statewide averages for each ramp. Accident rates for the northbound Hermosillo Road off-ramp appear to be above the statewide average, but, due to extremely low traffic counts, the rate is too small a sample to determine if the collision rate is significant. Analysis of accidents for the other Cabrillo Boulevard Interchange ramps indicated excessive speed to be the common factors. As part of the Cabrillo Boulevard/Hot Springs Interchange reconfiguration, each of these ramps with the exception of Hermosillo Road is either being closed or relocated, which will eliminate left side exits, short deceleration lanes and crest vertical curves (those that have a tangent slope at the end of the curve that is lower than that of the beginning of the curve) with limited stopping sight distances. Based on these improvements, the rates of accidents are expected to drop for these interchange ramps.

Brownstein Hyatt Farber Schreck, LLP

Comment 13 Traffic Facilities

The Forecast Operations Report (originally prepared October 19, 2009, and amended December 9, 2011) and the Cabrillo/Hot Springs Interchange Configuration Analysis Technical Memorandums (March 21, 2011 and July 19, 2011) were prepared as part of the traffic technical studies to support the environmental document. The studies were made available to the public on the Caltrans District 5 website during the public review period. They were also

available in the form of a CD contained in several area libraries and could be requested as part of the records request process. Because the traffic studies are lengthy and are incorporated by reference, only significant traffic impacts resulting from the project were included in the draft environmental document. This is in keeping with CEQA Guidelines that encourage agencies to disclose key environmental issues only and to eliminate unneeded bulk in an Environmental Impact Report [Section 15140-15151].

Although both state and local thresholds were included in those traffic studies, Caltrans does not typically consider local traffic thresholds as part of its evaluations. When determining the scope of the project’s traffic studies, Caltrans identified traffic-related changes associated with the project in response to requests by local jurisdictions. Caltrans performed extensive traffic studies to provide full disclosure of traffic circulation changes.

All five Cabrillo Boulevard interchange configurations identified as being viable in the draft environmental document (Configurations F, J, M, F Modified, and M Modified) reinstalled a new southbound on-ramp at this interchange. The inclusion of this feature will reduce southbound traffic on Coast Village Road as travelers coming from the beach and harbor on Cabrillo Boulevard will be given an opportunity to enter the freeway southbound at the Cabrillo Boulevard Interchange. Under a no-build (existing) condition, an opportunity to enter the freeway southbound is not available until the Olive Mill southbound on-ramp. Furthermore, the Preferred F Modified configuration provides two off-ramps in the northbound direction and a single northbound on-ramp connecting from Cabrillo Boulevard. This closely matches the existing northbound off- and on-ramp configurations, and so the existing spit of beach/harbor-bound travelers versus Coast Village Road area-bound travelers will continue in the same manner. Finally, once the existing southbound bottleneck on the freeway is removed with the addition of the new HOV lane, the perceived incentive for using the local street system in lieu

of the freeway to avoid congested freeway conditions will no longer exist, so through traffic will return to the freeway.

As a result of requests from local jurisdictions to provide additional traffic data in the final environmental document, Section 2.1.5 has been revised to include additional information on intersection analysis and level of service.

Brownstein Hyatt Farber Schreck, LLP

Comment 14 Traffic Impacts Los Patos/Cabrillo

Caltrans acknowledges that the Railroad Bridge over Cabrillo Boulevard currently acts as a constriction point for bicycles and pedestrians. The HOV project includes elements that are essential to providing mainline congestion relief and reconstruction of the UPRR railroad bridge is not essential to the mainline or ramp modification work.

As noted in the final environmental document, Caltrans has coordinated with City of Santa Barbara staff to include refinements to the preferred F Modified configuration. Those improvements will: 1) improve operations at the ramp junctions and reduce queuing that would otherwise occur under the 2040 no-build condition (including queuing that would otherwise extend back into the Los Patos/Cabrillo intersection during peak times), and 2) provide bicycle and pedestrian improvements within the state highway right-of-way as part of this project to align with the improvements being planned on Cabrillo under the UPRR railroad bridge by the City of Santa Barbara and SBCAG (based on the best available information at this time).

The City of Santa Barbara, in coordination with SBCAG, has initiated a project to replace the UPRR Railroad structure and provide improved bicycle and pedestrian facilities within the vicinity of the UPRR railroad structure and the Los Patos/Cabrillo intersection. A consultant that has experience working with UPRR has been hired by the City to complete this work. The SBCAG Board has

identified this project as a priority improvement and SBCAG is coordinating with the City to help develop and fully fund these improvements. Caltrans will coordinate closely with the City and SBCAG on the UPRR and Los Patos/Cabrillo intersection improvements during the design and permitting phase of the HOV project and options for shared funding and/or concurrent construction efforts will be further discussed at that time.

More specifically related to Los Patos/Cabrillo intersection operations, the draft environmental document clarified in the Chapter 2 traffic section that this intersection is expected to operate at level of service (LOS) F in the year 2040 under future build conditions. This LOS output is based on the Highway Capacity Manual two way stop control (TWSC) methodology. This methodology is based on worst approach control delay per vehicle, using the 2000 Highway Capacity Manual methodology and thus provides a single output that does not represent travel conditions for other intersection users. Conversely, all-way stop and signal controlled intersection LOS in the 2000 Highway Capacity Manual is based on weighted average control delay per vehicle. At the Los Patos/Cabrillo intersection, the low LOS value indicated by the TWSC methodology is based on a limited number of vehicles making left turns that would experience a 95th percentile queue of 2-4 vehicles in 2040 from the side streets. Vehicles traveling through the intersection on Cabrillo Blvd, however, would experience little to no control delay. Under F Modified, if no further improvements were made at this intersection apart from this project, the average vehicle control delay in 2040 for vehicles that travel through this intersection would be 3.1 seconds/vehicle in the AM peak hour and 12.1 seconds/vehicle in the PM peak hour. Using a weighted average control delay methodology, this would represent a 2040 LOS value of "A" in the AM peak hour and LOS "B" in the PM peak hour.

Brownstein Hyatt Farber Schreck, LLP

Comment 15 Traffic—Collisions

Collision information has been updated in Section 2.1.5 of the final environmental document. A discussion of Transportation/Traffic was inadvertently left off of the bulleted list in the beginning of Chapter 3. This has been added to the final environmental document.

Brownstein Hyatt Farber Schreck, LLP

Comment 16 Visual/Aesthetics

The “Existing Visual Setting” paragraphs at the beginning of the Visual/Aesthetics Section 2.1.6 are provided as an overview of the regional visual context. Each of the 26 subsequent Observer Viewpoints, analysis, and photo-simulations thoroughly disclose the value of median vegetation where it applies. At many viewpoints, median vegetation is specifically identified as the primary visual difference between alternatives.

Brownstein Hyatt Farber Schreck, LLP

Comment 17 Visual—Memorial Oaks

As stated in the draft environmental document, Alternative 1 would remove 16 Memorial Oaks. The Memorial Oaks were analyzed for their potential scenic value along with other corridor vegetation on pages 135-137, and also for their biological habitat value on page 354. Visual analysis of the Memorial Oaks as an aesthetic roadside feature was done as part of the Observer Viewpoint 5 assessment. The Observer Viewpoint 5 discussion includes a photograph of the Memorial Oaks, photo-simulations of each of the project alternatives and their relative effect on the oaks, discussion of viewer sensitivity, physical changes, ratings and level of potential impact. Memorial Oak tree replacement will occur as close to the area of loss as possible.

Brownstein Hyatt Farber Schreck, LLP

Comment 18 Visual—Memorial Oaks

Most of the recommendations made by the Memorial Oaks Focus Review Group are outside the realm of the environmental analysis required by the California Environmental Quality Act and National Environmental Policy Act, and therefore not included in the draft environmental document. The Memorial Oaks were determined to not be eligible as a historic resource. They are analyzed strictly for their potential scenic value along with other corridor vegetation on pages 135-137 of the draft environmental document.

The Memorial Oaks Focus Review Group was convened to help identify the commemorative aspects of the Memorial Oaks. Participants met five times between April 7, 2009 and May 5, 2010. The group made several recommendations that were determined appropriate as mitigation for potential visual impacts. As a result, the following measures were included in the list of Avoidance, Minimization, and/or Mitigation Measures on page 213 of the draft environmental document:

- Existing Memorial Oaks would be preserved to the greatest extent feasible, respective of the selected project alternative.
- All new oak trees planted as part of the Memorial Oak tree mitigation measure would be propagated from the existing Memorial Oak trees.
- All new non-oak planting near the Memorial Oaks would be species that are easily differentiated from the Memorial Oaks, in terms of their visual character (form, size, color and or texture).
- Concrete median barrier and new soundwalls in the immediate vicinity of the Memorial Oaks would include aesthetic treatment unique to the Memorial Oaks area.

Brownstein Hyatt Farber Schreck, LLP

Comment 19 Visual Impact Assessment

The Visual/Aesthetics section of the draft environmental document included a summary of the full analysis of the project's potential visual effects. The Visual Impact Assessment technical supporting document, bound separately but available during the public comment period, contains the complete technical rating criteria, numerical equations, evaluations, and definitions. The methodology used is consistent with the Federal Highway Administration requirements for Visual Impact Assessments.

Brownstein Hyatt Farber Schreck, LLP

Comment 20 Visual—Summerland

Observer Viewpoints 8 and 9 located in the draft environmental document, Section 2.1.6 (Visual/ Aesthetics) on pages 146-153, represent viewpoints from the highway toward the Summerland community commercial area, clearly showing how soundwalls would affect those views. Four additional observer viewpoints further show how the project would affect views to and from the Summerland community, including the commercial businesses. The draft environmental document Visual/Aesthetics section appropriately disclosed: "As seen from U.S. 101, the proposed soundwalls would also limit much of the view to the (Summerland) community, including the commercial area along Lillie Avenue and the hillsides to the north." In addition, the draft environmental document stated: "Throughout all of the Summerland Assessment Unit, each of the project alternatives would result in adverse visual changes."

Brownstein Hyatt Farber Schreck, LLP

Comment 21 Visual

The reference to "configuration M" was corrected to "Configuration F Modified" in Section 2.1.6 of the final environmental document.

Brownstein Hyatt Farber Schreck, LLP

Comment 22 Visual

Project-level visual/aesthetics impacts were provided in Chapter 3 in the second paragraph under Unavoidable Significant Effects. However, to make it more obvious to the reader, the paragraphs have been reversed in the final environmental document with some additional text. The first paragraph now reads: "Even with implementation of avoidance, minimization, and mitigation measures listed in Sections 2.1.6, 2.4, 2.5 and 3.3, the project's visual impact as seen from U.S. 101 and surrounding communities would be significant regardless of the selected alternative. The measures combined with proposed project features such as replacement landscaping and aesthetic treatments to walls would lessen the adverse visual change to the corridor. However, the overall significant impacts remain due to alteration of scale, an increase of hard surfaces, and loss of vegetative character."

Brownstein Hyatt Farber Schreck, LLP

Comment 23 Cultural Resources

Recent design revisions were able to shift Alternative 1 (preferred alternative) toward the median in an effort to minimize potential impacts to the Via Real Redeposited Midden. Comprehensive studies conducted by Caltrans suggest that the National Register-eligible portion of the site is not only located below the level of proposed Highway 101 construction but is also located outside the State right-of-way—and therefore outside the Area of Direct Impact. An Environmentally Sensitive Area (ESA) and exclusionary fencing will be established and enforced around the known site limits. Although we do not anticipate that there will be any impacts to the redeposited midden, or that significant portions of the site extend into the State right-of-way, or that any other significant archaeological resources are present, Caltrans has deemed it prudent to consider the remote possibility that discoveries during construction may still occur.

Caltrans has consulted with the State Historic Preservation Officer and local Chumash representatives identified by the Native American Heritage Commission to develop a systematic approach to addressing not only any adverse effects to the Via Real Redeposited Midden but also effects to any similar as yet unidentified archaeological resources discovered during construction, in the unlikely event that such discoveries are made. Any adverse effects will accordingly be resolved—i.e., reduced to a less than significant impact—in conformity with the Treatment and Data Recovery Plan appended to the June 20, 2013 *Programmatic Agreement between the California Department of Transportation and the California State Historic Preservation Officer Regarding the South Coast 101 HOV Lanes Project, U.S. Route 101, Santa Barbara County, California*. Both the Programmatic Agreement and the Treatment and Data Recovery Plan are included in Appendix D, *State Historic Preservation Officer Correspondence*.

Brownstein Hyatt Farber Schreck, LLP

Comment 24 Cultural Resources

The June 20, 2013 Programmatic Agreement between the California Department of Transportation and the California State Historic Preservation Officer Regarding the South Coast 101 HOV Lanes Project, U.S. Route 101, Santa Barbara County, California, stipulates that any adverse effects to the Via Real Redeposited Midden, as well as effects to any similar as yet unidentified archaeological resources during construction, will be resolved—i.e., reduced to a less than significant impact—by implementing the Treatment and Data Recovery Plan, which allows Caltrans to proceed on a predetermined course of action. The plan includes a decision matrix to accommodate the appropriate handling of less-than-significant finds and outlines steps that will be taken in the unlikely event that a significant find is made.

If Caltrans determines, during the implementation of the Data Recovery Plan, that the plan or the project will affect a previously unidentified property that is categorically different from those covered by the Plan, Caltrans shall address the discovery in accordance with Code of Federal Regulations Section 800.13(b).

If human remains are discovered, State Health and Safety Code Section 7050.5(b) states that further disturbances and activities must cease in any area or nearby area suspected of overlying remains, and the county coroner shall be contacted. Pursuant to State Health and Safety Code 7050.5(c), if the county coroner determines that the human remains are or may be of Native American origin, the Native American Heritage Commission will be contacted, and the discovery will be treated in accordance with the provisions of California Public Resources Code 5097.98(a)-(d). The Native American Heritage Commission will notify the Most Likely Descendent. The District 5 or construction personnel who discovered the remains will contact the cultural resource specialist who will then work with the Most Likely Descendent on the respectful treatment and disposition of the remains. Further provisions of Public Resources Code 5097.98 are to be followed as applicable.

Both the Programmatic Agreement and the Treatment and Data Recovery Plan are included in Appendix D, *State Historic Preservation Officer Correspondence*.

Brownstein Hyatt Farber Schreck, LLP

Comment 25 Floodplain Mapping

The reference will be changed to Appendix E. Note that the maps have been updated as a result of a Letter of Map Revision (LOMR) approved in December 2012.

Brownstein Hyatt Farber Schreck, LLP

Comment 26 Hydrology and Floodplain

The Second District California Court of Appeals ruled in April 2012 that it was appropriate to use projected conditions, when supported by substantial evidence, as a way to measure the environmental impacts of a project. The court rejected “the notion that CEQA forbids, as a matter of law, use of projected conditions as a baseline” and further stated: “Nothing in the statute, the CEQA Guidelines, or CBE requires that conclusion” (Neighbors for Smart Rail v. Exposition Metro Line Construction Authority [Smart Rail]).

The Linden and Casitas Pass Interchanges project is included in the Santa Barbara County Regional Transportation Plan and is fully funded. The Final Environmental Impact Report/Environmental Assessment for Linden and Casitas Pass was approved in July 2010, and project design is more than 95% complete. Construction of the Linden and Casitas Pass Interchanges project is reasonably foreseeable; therefore, analyzing impacts of the South Coast 101 HOV Lanes project with a future baseline that includes completion of the interchanges project is appropriate.

Brownstein Hyatt Farber Schreck, LLP

Comment 27 Water Quality and Stormwater Runoff

Section 2.2.2 of the final environmental document has been updated to reflect the approved 2010 303(d) List of Impaired Water Bodies.

Brownstein Hyatt Farber Schreck, LLP

Comment 28 Water Quality and Stormwater Runoff

Design pollution prevention and storm water treatment best management practices (BMPs) will be placed wherever feasible. All efforts will be taken to locate best management practices in the same watershed as the impact is expected to occur. However due to site constraints such as high ground water levels in some locations, slow percolating soils, terrain, and lack of space to

place best management practices, it is not anticipated that this goal will be fully realized. No offsite best management practices beyond the watershed limits of this project are under consideration at this time. Preliminary studies indicate that there will not be any residual impacts if 100 percent of the water quality volumes are not treated. See the additional explanation provided in Section 2.2.2 of the final environmental document.

Brownstein Hyatt Farber Schreck, LLP

Comment 29 Water Quality and Stormwater Runoff

Litter was mentioned as a potential impact of the project since trash is an inherent problem wherever roads occur. Litter can be considered one form of permanent highway pollutant. Certain water bodies are on the 303(d) list for impairment due to trash. None of these water bodies exist in the project limits. Therefore, no permanent stormwater treatment best management practices (BMPs) for trash removal need to be under consideration for this project. Furthermore, all Caltrans-approved storm water treatment best management practices generally reduce the amount of trash and debris that are passed into existing waterways from the U.S. 101.

Brownstein Hyatt Farber Schreck, LLP

Comment 30 Water Quality and Stormwater

Riparian and wetlands information shouldn't have been included in the Water Quality section. Please see Section 2.3.1 in the final environmental document for all discussion related to riparian areas.

Brownstein Hyatt Farber Schreck, LLP

Comment 31 Water Quality and Stormwater

The Water Quality section (Section 2.2.4 in Volume I) and the California Environmental Quality Act Checklist (Appendix A-6 in Volume II) were revised in the final environmental document to accurately reflect the findings of the analysis.

Brownstein Hyatt Farber Schreck, LLP

Comment 32 Geology/Soils/Seismic/Topography

The preliminary Geotechnical report, like all of the other technical reports, was made available at the four specified libraries and on the website along with the draft environmental document. To address your stated comments, changes have been made to Section 2.2.3 of the final environmental document.

Brownstein Hyatt Farber Schreck, LLP

Comment 33 Paleontology

The apparent discrepancy between the sections describing the different formations and their relative mitigation is based on the probability of encountering Rincon formation during the construction phase. With Alternative 1, an encounter would be less likely to occur; the risk level for encountering the formation is considered low. Therefore, the operative word “may” relative to encountering the Rincon formation should stand because the formation is next to one of the excavation sites and not on the proposed alignment according to the geologic mapping. However, this does not exclude the possibility of the formation being encountered at depth if the formation dips to the south under the existing highway or proposed alignment.

Brownstein Hyatt Farber Schreck, LLP

Comment 34 Hazardous Wastes

The heading for Site 27 was removed, and the discussion under the heading for Site 12 was revised.

No further discussion of the requirements for removal of the underground storage tank from Site 12 (27) is necessary. The tank was removed on May 10, 2012. The Santa Barbara County Fire Department Fire Prevention Division (PPD) Leaking Underground Fuel Tank (LUFT) Program issued a tank removal

permit and performed oversight of the tank removal. The division issued a “No Further Action” letter on June 12, 2012. Site 12 (27) will not affect construction of the South Coast 101 HOV Lanes project.

Brownstein Hyatt Farber Schreck, LLP

Comment 35 Hazardous Wastes

The property at 2285 Lille Avenue in Summerland (Summerland Texaco) was not discussed in the draft environmental document. It was identified as Site 9 and discussed in the Initial Site Assessment dated June 2009. Based on the distance from the project and the expected construction activities in the nearby vicinity, this site (along with many other sites) was determined to be a low risk to the project and therefore was not carried forward for further analysis or discussion in the draft environmental document.

Brownstein Hyatt Farber Schreck, LLP

Comment 36 Hazardous Wastes

In June 2009, the Department of Toxic Substances Control adopted a Negative Declaration under the California Environmental Quality Act documenting that the proposed actions and implementation of the variance for the re-use of aerially deposited lead-containing soils within the State right-of-way will not present a significant threat to human health or the environment. Public notice and public meetings were held in support of the Negative Declaration and the Department of Toxic Substances Control responded to all public comments made at that time. The Highway 101 corridor was identified in the Negative Declaration as an area where the variance could be used. No additional California Environmental Quality Act analysis is required for use of the variance on this project.

Brownstein Hyatt Farber Schreck, LLP

Comment 37 Air Quality

The statement was corrected in Section 2.2.3 of the final environmental document to indicate “about 7 miles northeast.”

Brownstein Hyatt Farber Schreck, LLP

Comment 38 Air Quality

Air quality impacts on the project were determined to be less than significant, therefore, mitigation for air quality is not required. The minimization measures your comment refers to are those discussed in Chapter 3 of the draft environmental document, which is the California Environmental Quality Act chapter that includes a section on Climate Change. The measures are not specific mitigation measures, but are instead designed to show ways that Caltrans minimizes impacts using a holistic perspective. While these are more of a generic collection of measures that can be used for Caltrans projects, each must be considered in the context of the applicable project.

Brownstein Hyatt Farber Schreck, LLP

Comment 39 Noise

See the response to comment 1 from Behrens and Associates. Calibration (or attenuation) is the adjustment used to compensate for physical topographic parameters that cannot be modeled as numerical variables. Calibration is not used for adjustments due to wind. For Soundwall S471, the adjustment (“calibration”) of -3dB was applied to the data of modeling point R76 only, because the field reading varied from the modeled value by more than 2 dB at companion short-term sampling point ST22. (ST22 had a measured value of 62.7 dB, and companion modeling point R76 had a modeled value of 65.9 dB.) This calibration factor was not applied to any other receptor groups for Soundwall S471.

The calibration values are not entered into the computer model, but rather are adjustments to the values that are generated by the model. This calibration value does not need to be calculated from peak hour information because it is a method to improve accuracy of modeled data as compared to measured sound levels due to acoustic variables present in the field that cannot be factored in the model. The methodology assumes this attenuation remains constant with varying traffic loading of the freeway. Noise generation as a function of traffic loading is not linear and is well understood by traffic professionals. Long-term monitoring provides noise outputs with companion traffic counts for each hour, which allows reasonable prediction of actual noise outputs at any given time. This removes the necessity of collecting only existing noise data during peak noise hours for the purpose of adjusting or “calibrating” the model outputs. Caltrans Technical Noise Study, October 1998, page N-66, details the method of adjusting field readings to other than the noisiest hour. For modeling future traffic, the Noise Study Report (NSR) assumes worst-case traffic, 1,900 vehicles per lane, and 1,650 vehicles per lane for the future build HOV lane. Refer to the Noise Study Report Section 5.3.1 for a more detailed explanation on traffic data used in the (TNM) model.

General calculations—To determine if an affected residence is benefiting from a soundwall, the wall should provide a minimum attenuation of 5 dBA for that residence. Many residences are affected, but only 16 residences were identified in the Noise Study Report to be benefited by the proposed soundwall at Fernald Point. (An additional parcel was identified at 1787b Fernald Point, created by a lot split.) If the soundwall fails to provide this 5-dB attenuation, Caltrans does not include the parcel in the total allowance calculations. The critical design receiver is used for determining the maximum location impact for a wall that is acoustically representative of the residences. For Soundwall S471, the critical design receiver is represented by R75. This receiver location has a calculated allowance of \$49,000 for the proposed adjacent wall height of 12 feet. This individual allowance applied to 17

benefited residences results in a soundwall allowance of \$833,000. The cost of the proposed soundwall is estimated at \$1,067,840, exclusive of bridge widening and floodgate costs. This soundwall remains financially unreasonable. In addition, this soundwall would have to cross a floodway that has flood flows of a magnitude that cannot be passed with floodgates, which makes this soundwall infeasible. Currently, even financially reasonable soundwalls crossing this floodway are not being recommended for construction due to potential flooding exacerbation upstream of the soundwall locations.

Wind—The protocol for analyzing noise does not provide for speculation of worst-case weather conditions. Validity of the model output depends on rational decisions on field conditions present at the time of data collection to avoid skewing the collected data. The important factor is to not collect data if wind is blowing in excess of 12 miles per hour because the data would not represent average conditions. If the field notes indicate “null” or “calm” conditions, wind is assumed not to be a problem.

Heavy vegetation—Page 22 of the Noise Study Report, under the title of “Existing Land Uses,” references “heavy vegetation” for this location. Page 12 clarifies that generally “dense woods” can substantially reduce noise and “heavy vegetation” can provide increased noise reduction depending on density. There is no conclusion drawn that either of these conditions could provide “adequate noise buffering.”

The California Environmental Quality Act determination of significance in this document is based on the measures contained in the document. Any additional measures required under a Local Coastal Plan Amendment or Coastal Development Permit process are considered potential enhancements, but are not required mitigation under the California Environmental Quality Act. Caltrans will seek amendments to the Local Coastal Plans that will apply

only to activities directly associated with specific projects. The amendments would not apply to future development.

Brownstein Hyatt Farber Schreck, LLP

Comment 40 Noise

The Noise Study Report indicated a total of 19 dwellings that potentially could benefit 5 dB from the building of a soundwall (S471) 16 feet tall, which is generally the tallest soundwall considered under normal cases. We have since confirmed two additional locations that will benefit from such a wall that were not identified during the Noise Study Report investigations; this brings the total to 21 possibly benefitted. Note that affected residences are counted when future predicted noise levels approach or exceed 67 dB, while benefited residences are counted by predicted soundwall noise attenuation of at least 5 dB. Several potential soundwall heights and configurations were evaluated for S471 in an attempt to find a cost-effective balance between wall allowance and wall cost, but the effort was not successful. As wall heights were lowered to lower construction costs, fewer residences received the benefit of 5 dB, so the wall allowance was smaller. Because the soundwall cost was more than the cost allowance, the soundwall is not financially reasonable and still not recommended for construction. In addition, a proposed soundwall at this location would cross a floodway that has flood flows of a magnitude that cannot be passed with floodgates. Currently, financially reasonable soundwalls crossing this floodway are not being recommended for construction due to potential flooding exacerbation upstream of the soundwall locations.

Per the Federal Highway Administration and Caltrans Noise Protocol (2006), costs associated with building soundwalls cannot be privately funded. The California Environmental Quality Act uses a baseline noise level relative to future build noise levels to address future noise impacts to the residences in the area of potential noise impact. According to the Noise Study Report, the

increase in project build noise levels for the residences in Fernald Point reached a maximum of 2 dBA. A healthy human ear can generally not be able to perceive a noise increase of 3 dBA in noise level, so California Environmental Quality Act impacts were not considered for the residences in Fernald Point.

Only a portion of Soundwall S281 could be proposed for construction due to the center portion of the wall being dropped for safety reasons when it was determined it would have blocked “stopping sight distance” for traffic. The remaining eastern portion of S281 was determined to be financially reasonable as a stand-alone wall segment and is recommended for construction. This portion of Soundwall S281 together with S257 was evaluated as a two-wall system to determine if S257 could be constructed. However, Soundwall S257 as an independent wall was found not to be financially reasonable and therefore was not recommended for construction. This is mostly due to the additional costs associated with acoustically “overlapping” the two walls coupled with the less dense development at the southern end of Padaro Lane. See Volume I, Section 2.2.7, for more information on Soundwalls S281 and S257.

Brownstein Hyatt Farber Schreck, LLP

Comment 41 Natural Biological Communities

The Natural Communities analysis is presented in Volume I, Section 2.3.1 of the final environmental document and is based on the Natural Environment Study (January 2012; Addendum April 2014). More detailed information about natural communities and riparian areas within the project area can be found in the Natural Environment Study and Addendum. The original Natural Environment Study and other technical studies are available on the public information website with the draft environmental document, posted in late March 2012 (http://www.dot.ca.gov/dist05/projects/sb_101hov/index.html). The 2014 Addendum is available on request. If you would like a copy, please

contact Jason Wilkinson at the following email address:

Jason_Wilkinson@dot.ca.gov

In response your comment, the final environmental document mapping was updated to show locations and areas of riparian impacts. Riparian impacts are shown in Table 2.33, which includes acreage of riparian vegetation to be affected. Analysis of mapping has shown that impacts are small; therefore additional analysis such as that proposed is not necessary. Most of the impacts are temporary, and replanting is planned at a 3:1 ratio for native oaks, sycamores, and willows. The 0.03 acre of permanent impacts to riparian vegetation at Greenwell Creek will be offset by enhancing 0.145 acre of the creek.

In response to your concern about impacts to trees not proposed for removal, Volume I, Section 2.3.1 of the draft environmental document stated that prior to any ground-disturbing activities, environmentally sensitive area fencing would be installed around the drip line of the trees to be protected. Where feasible, fencing will be installed 5 feet from the drip line of trees to be protected.

The recommendations of the Memorial Oaks Focus Review Group are outside the realm of environmental analysis required by the California Environmental Quality Act and National Environmental Policy Act, and not part of the draft environmental document. The Memorial Oaks were determined to not be eligible as a historic resource, but their local interest is recognized and discussed on pages 112–115 of the draft document. Alternatives 1 (preferred alternative) and 3 would remove 16 Memorial Oaks from the highway median and retain the oaks on the road shoulder. Alternative 2 would remove 32 Memorial Oaks, 16 from the median and 16 from the road shoulder. The Memorial Oaks were analyzed for their potential scenic value along with other corridor vegetation on pages 135–137, and also for their biological habitat

value on page 354. Although detailed planting design for the Memorial Oaks area has not been prepared at this time, mitigation measures relative to the loss of the Memorial Oaks and other corridor vegetation were identified on page 465 of the draft environmental document, and on the fourth bullet of page 354. Memorial Oak tree replacement will occur as close to the area of loss as possible considering safety and horticultural requirements.

The following measure is located in Section 2.3.3 of the draft environmental document: “To avoid impacts to nesting birds, tree removal would occur between September 1 and February 15. If tree removal is required during the nesting season, a qualified biologist would need to conduct a focused survey for active bird nests in the trees to be removed. If any active migratory bird nests are found, Caltrans would coordinate with the California Department of Fish and Wildlife to determine an appropriate buffer based on the habits and needs of the species.”

Brownstein Hyatt Farber Schreck, LLP

Comment 42 Coast Live Oaks

The draft environmental document proposed mitigation for oak and native tree removals in accordance with the County of Santa Barbara Urban Oak Tree Interpretive Guidelines (2007). Although higher numbers are sometimes appropriate, the limited habitat value of the trees to be removed and the fact that all replacement trees would be maintained in perpetuity within the Caltrans right-of-way make this an appropriate number for this project. This determination followed habitat assessments done for the Natural Environment Study, which included the highway roadside environment. The replacement oak tree plantings will be from minimum 1-gallon-size containers. Generally, smaller trees are locally preferred because they are quicker to establish and require less long-term maintenance. But in urban areas where space is limited, larger trees will be incorporated into the planting plan to accommodate a more immediate visual presence. Larger

container-size plantings require more attention and care to establish. Trees as large as 24-inch boxes will be used, depending on specific site conditions and the ability to be safely and regularly maintained. The Santa Barbara County Flood Control District will not be maintaining the oak trees; this sentence was included to describe site conditions and highlight the fact that the riparian areas are cleared routinely to maximize the capacity of the channels and that this activity reduces their value as habitat.

Because riparian mitigation planting will also serve as visual mitigation and aesthetic treatment, it will be treated as permanent highway planting for the project and become part of the landscaped freeway environment. Permanent irrigation will also be provided, as well as a three-year plant establishment period. Dead, damaged and dying plants will be replaced during the three-year plant establishment period. After a period of six months, replacement plants will be required to be one container size larger than what was originally planted. Caltrans will then maintain these plantings indefinitely along with all of the ornamental roadside planting in the region. All riparian plantings will be monitored to ensure successful revegetation at six months after implementation, then once a year for three years.

Brownstein Hyatt Farber Schreck, LLP

Comment 43 Coast Live Oaks

The fourth bullet refers to replanting locations and monitoring, not replanting ratios. The final environmental document was updated to mitigate for oak tree removals in accordance with the County of Santa Barbara Draft Urban Oak Tree Interpretive Guidelines (2007).

Except for western sycamore trees, the species listed are part of the coastal scrub series that was evaluated in the Natural Environment Study. There are no coastal scrub impacts, so the conclusion is that there are no significant impacts under the California Environmental Quality Act. Western sycamore

trees occur in some riparian areas in the biological study area. Replacement planting is proposed at a 3:1 ratio for western sycamore trees removed from riparian areas as described in Section 2.3.1 of the draft environmental document. Very Limited numbers of the other species listed are found within the remainder of the project footprint interspersed in landscape planting. Draft conceptual planting plans include widespread planting along the State right-of-way with a palette of primarily native species, including western sycamore, lemonade berry, toyon, laurel sumac, and coyote bush. Most of the biological study area currently supports non-native landscape plants such as *Myoporum laetum*, *Acadia longifolia*, and *Carpobrotus edulis*. Quantities of native shrub species that will be included in the plans will be subject to review and approval by the local coastal permitting agencies.

Brownstein Hyatt Farber Schreck, LLP

Comment 44 Wetlands

Language has been added to Section 2.3.2 of the final environmental document to clarify that both the California Department of Fish and Wildlife and Coastal Commission use a one-parameter wetland definition. All creeks, wetlands and other waters are discussed in the Affected Environment section of the draft environmental document. Further detailed information can be found in the project's Natural Environment Study (January 2012, Addendum April 2014).

Maps showing impacts to jurisdictional wetlands are part of the project's Natural Environment Study. The original Natural Environment Study and other technical studies are available on the public information website with the draft environmental document, posted in late March 2012 (http://www.dot.ca.gov/dist05/projects/sb_101hov/index.html). The 2014 Addendum is available on request. If you would like a copy, please contact Jason Wilkinson at the following email address: Jason_Wilkinson@dot.ca.gov.

Mitigation is proposed both onsite and offsite at the Carpinteria Salt Marsh. Mitigation ratios proposed are based on the function and value of affected features and on values determined to be appropriate on previous Caltrans projects. Following comment from local and state agencies, Caltrans is mitigating for permanent impacts to coastal wetlands at a 3:1 ratio because the coastal wetlands affected by the project are of low quality; they are primarily constructed roadside drainage ditches next to U.S. 101. All wetlands are human-made and routinely disturbed. They serve the function of filtering highway runoff, but provide little wildlife habitat. The 3:1 mitigation ratio is consistent with what was proposed by Caltrans for the Linden Casitas project.

Restoration of temporary impacts is addressed in Volume I, Section 2.3.2 of the final environmental document in the second and third bullets listed under the Avoidance, Minimization, and/or Mitigation Measures.

Brownstein Hyatt Farber Schreck, LLP

Comment 45 Animal Species

Steelhead trout were simply mentioned as a species observed in the biological study area. They are discussed in depth the endangered species section.

Migratory birds are protected according to provisions of the federal Migratory Bird Treaty Act. The Migratory Bird Treaty Act and California Fish and Wildlife Code prohibit taking occupied nests. The draft environmental document presented measures on page 387 that will be implemented to avoid and/or minimize impacts to nesting birds. With these avoidance and minimization measures in place, the project would not violate the Migratory Bird Treaty Act.

Detailed information on potential impacts to species is addressed in the project's Natural Environment Study. The Natural Environment Study and other technical studies are available on the public information website with

the draft environmental document, posted in late March 2012. Also, Caltrans can provide a hard copy of the Natural Environment Study (with mapping) by mail. Email requests for hard copies of technical studies can be made to Jason Wilkinson, Senior Environmental Planner, at Jason_Wilkinson@dot.ca.gov.

The following language has been added to the bullet in the measures listed in the final environmental document: "If any active swallow nests are found, Caltrans would coordinate with the California Department of Fish and Wildlife to determine an appropriate buffer based on the habits and needs of the species. The nest would not be removed until the young have fledged and nesting is complete."

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Comment 46 Threatened and Endangered Species

General wildlife surveys of the Biological Survey Area were conducted between March 2009 and January 2012 by Caltrans Biologists for the draft environmental document. Additional studies were conducted between July 2012 and March 2014 by Caltrans Biologists to address nesting cormorants that moved into the project area. The original Natural Environment Study and other technical studies are available on the public information website with the draft environmental document, posted in late March 2012 (http://www.dot.ca.gov/dist05/projects/sb_101hov/index.html). The 2014 Addendum is available on request. If you would like a copy, please contact Jason Wilkinson at the following email address: Jason_Wilkinson@dot.ca.gov

Information from the Natural Environment Study was added to the final environmental document to further address sensitive species (Volume I, see Section 2.3.4). The California Environmental Quality Act checklist was modified in the final environmental document to show that the project will result in temporary impacts to the steelhead trout and tidewater goby along with the potential take of these individuals.

The project will not result in significant impacts to these species. Biological Assessments were prepared for the resource agencies responsible for these federally endangered species. The project will result in temporary impacts during construction. At locations that support steelhead trout or tidewater goby populations, the project will replace conditions in kind, or with slightly improved flow conditions, and will not introduce any substantial interference to movement. The following statement was added to Section 2.3.4 the final environmental document: "If water is flowing at San Ysidro Creek between June 1 and October 31, a water diversion will be required."

Formal consultation under Section 7 of the Endangered Species Act was conducted with the National Oceanic and Atmospheric Administration National Marine Fisheries Service for potential incidental take of steelhead trout in Arroyo Paredon Creek, Romero (Picay) Creek, and San Ysidro Creek, and a biological opinion was obtained September 30, 2013. Formal consultation under Section 7 of the Endangered Species Act was conducted with the U.S. Fish and Wildlife Service for potential incidental take of tidewater goby in Arroyo Paredon Creek. A biological opinion was obtained on August 6, 2012. The formal Section 7 process with both the U.S. Fish and Wildlife Service and with NOAA's National Marine Fisheries Service concluded that with the agreed upon avoidance and minimization measures in place, the project is not likely to jeopardize the continued existence of tidewater gobies or steelhead trout and will not adversely affect critical habitat for either species.

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Comment 47 Construction Impacts - Bikeways

Please refer to Section 2.1.5 Traffic/Transportation, Pedestrian and Bicycle Facilities in the final environmental document for more details on pedestrian and bike trails.

Brownstein Hyatt Farber Schreck, LLP

Comment 48 Construction Impacts - Emergency Services and Bikeways

During construction, the Transportation Management Plan would address temporary impacts to bicycles and pedestrians in addition to vehicles during periods when an area is not accessible. Two lanes in each direction of the freeway will remain open during construction. Furthermore, measures would be taken to avoid impacts to emergency providers with alternative routes prior to any roadway or highway closures. Refer to Sections 2.1.4 and 2.4 for more details.

All pedestrian facilities within the project limits that are modified as part of this project would comply with the Americans with Disabilities Act. During construction, access will be maintained for bicyclists, pedestrians, and persons with disabilities through construction areas.

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Comment 49 Construction Impacts - Water Quality

Due to uncertainties concerning the exact design details, timing, equipment usage rates associated with specific project features and potential work required, forecasting exact amounts of sediment and debris is difficult and so a conservative estimate was used. Please refer to Volume I, Section 2.2.2 and Table 2.25 for more information related to construction site activities and materials.

Brownstein Hyatt Farber Schreck, LLP

Comment 50 Construction Impacts - Shade Canopy

Please refer to Section 2.3 and Table 2.37 in Volume 1 of the final environmental document. Design changes made after March 2012 and a field reconnaissance for determining canopy acreage resulted in revised riparian impacts as shown in Table 2.37.

Brownstein Hyatt Farber Schreck, LLP

Comment 51 Construction Impacts - Air Quality

Each configuration differs in the amount of construction time. However, the Project Development Team has selected F Modified as the preferred configuration at the Cabrillo Boulevard and Hot Springs Interchange. Caltrans Standard Specification sections pertaining to dust control and dust palliative applications are a required part of all construction contracts and would effectively reduce and control emission impacts during construction. Please refer to Section 2.4 for measures pertaining to reducing air pollution during construction.

Brownstein Hyatt Farber Schreck, LLP

Comment 52 Construction Impacts - Erosion and Biological Resources

The resources mentioned in the comment refer to potential impacts that may occur during construction. Measures are provided in Volume I, Avoidance, Minimization, and/or Mitigation Measures subsection of Section 2.3.2 and Section 2.4.

Brownstein Hyatt Farber Schreck, LLP

Comment 53 Cumulative Impacts

The County of Santa Barbara Urban Oak Tree Guidelines are not relevant for the California Environmental Quality Act determination of visual impacts and the appropriate level of mitigation. The cited mitigation measure requires a minimum-size planting container and does not preclude larger container sizes, consistent with County guidelines.

The referenced statement regarding mitigation for aesthetic treatment on concrete median barriers and new soundwalls was changed to “shall.”

Brownstein Hyatt Farber Schreck, LLP

Comment 54 CEQA Evaluation

Mitigation measures were listed in several areas of the draft environmental document, including in Chapter 2 where the applicable resource areas are discussed and in the summary of minimization/mitigation measures in Appendix F. As pointed out, the mandatory findings of significance and unavoidable significant environmental effects were not discussed at length in the draft environmental document; therefore, a discussion of visual impacts has been added to Volume I, Section 3.2.4 and 3.2.5.

The checklist has been modified to reflect a “less than significant impact” to XVII. Utilities Service Systems. A statement was added under the Utilities/Emergency Services discussion that references the reader to Section 2.2.2, Water Quality and Storm Water Runoff. That section discusses permanent drainage systems that will be made part of the project, which include culverts, permanent vegetative treatment facilities, and other runoff treatment measures that will be finalized during the design phase of the project.

Brownstein Hyatt Farber Schreck, LLP

Comment 55 Conclusionary CEQA findings

Following public comment on noise-related issues in the draft environmental document, Caltrans staff re-analyzed noise models and benefitted receptors at various locations including those at Fernald Point and Padaro Lane to determine whether there were any additional factors that hadn’t yet been considered. After additional analysis, the results remained the same for those two locations; the number of benefitted receptors did not change, and the Caltrans/federal protocol could not justify proposing walls at the Fernald Point and Padaro Lane locations.

It should also be noted that federal guidelines do not allow for private financial contributions toward the construction of soundwalls.

May 8, 2012

CalTrans

Jim Taylor
5563 Calle Ocho
Carpinteria CA 93013
408-666-7356
jim@carpedata.com

Dear Sirs ,

The mission of Carpinteria Beautiful is the promotion, preservation and enhancement of the natural beauty of Carpinteria.

As you are no doubt aware, road noise from Highway 101 reaches most parts of Carpinteria. Existing levels of this noise are often quite annoying to our residents, even at considerable distance from the freeway.

Our organization wants to make sure that the pavement specified for the South Coast HOV project where it passes through our town is designed to minimize as much as possible the sound generated by tires.

We are encouraged by CalTrans research and publications on this subject, such as the following from a memo dated October 6, 2009, from the Division of Pavement Management: " Research done to date has shown that traffic noise can be minimized by incorporating quieter pavement strategies in pavement mix designs and construction practices at little or no added cost. Quieter pavements help reduce the noise generated from the interaction between vehicle tires and pavement (i.e., at the source where the tire meets the road, thereby helping to reduce overall traffic noise impacts to the communities adjacent to the highways)."

As a community, we would greatly appreciate the use of the most sound abating pavement possible on the project.

Thank you for your consideration,

—

Jim Taylor,
Member
Carpinteria Beautiful



Jim Taylor

Carpinteria Beautiful (Jim Taylor)

Comment Noise-Attenuating Pavement

The project proposes to incorporate a noise-attenuating pavement surface. Technology is rapidly advancing in this field, making it difficult to predict which types will be more successful and longer lasting. Therefore, the actual surface will be determined during final design.



July 5, 2012

CalTrans District 5
Environmental Branch
Attn: Matt Fowler
50 Higuera Street
San Luis Obispo, CA 93401

To whom it may concern:

Caruso Affiliated, owner of the Miramar Hotel property in Montecito, would like to strongly urge Caltrans to construct all of the proposed sound walls throughout Montecito as part of the 101 widening project. We strongly support the sound wall adjacent to the San Ysidro on and off ramps on the inland side of the highway, and would also urge CalTrans to consider more sound walls on the ocean side of the highway. All feasible noise mitigation measures should be exhausted to reduce highway noise to adjacent residents and to future hotel guests of the Miramar.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matt Middlebrook'.

Matt Middlebrook
Senior Vice President, Development

Caruso Affiliated (Matt Middlebrook)

Comment 1 Noise

Based on the large number of comments on noise, Caltrans staff reevaluated soundwalls in areas of high-density development to identify short sections of soundwalls that might be financially reasonable. Several soundwall extensions are now recommended for construction beyond what was identified in the draft environmental document. In regard to the soundwall segment on the northbound side of the highway, soundwalls are being recommended for construction from Sheffield Drive to Olive Mill Road (with exceptions for locations where it crosses the identified Federal Emergency Management Agency floodway, street openings, and two low-density development areas that are 200 feet east of the floodway and 500 feet west of San Ysidro Road). See Section 2.2.7, Volume I for more details on soundwalls.

It is Caltrans' understanding that the approved Miramar Hotel property renovation includes a private soundwall. Therefore, any additional soundwall proposed as part of the South Coast 101 HOV Lanes project would not provide an additional 5 decibels of noise attenuation, which means it would not meet Caltrans criteria for recommending soundwalls. In the reevaluation of Soundwall S489, it was discovered that one residential unit had not been accounted for in the Noise Study Report. Including that unit did not change the final conclusion. The wall in this area remains not financially reasonable. Therefore, no additional southbound soundwalls are recommended for construction near Posilipo.



Comment Card

NAME: MS K.L. EARP
 ADDRESS: #311 SANTA & CASTVILLAGE RD CITY: SANTA B ZIP: 93108
 REPRESENTING: SELF

- ☐ Please add me to the project mailing list.
☐ Please email me updates on this project. E-mail Address: _____

I would like the following comments filed in the record* (please print):

- 1 I am concerned about the continued traffic congestion
on Coast Village Road due to the lack of on and
off ramps in the area.
- 2 I totally support the plan, F Modified, to add on and
off ramps at Cabrillo in both the north and south
bound direction.

Sincerely
LEAP General Manager
Four Seasons Resort Santa Barbara

*Place your comments into the Comment Box tonight
 or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
 Environmental Branch
 Attention: Matt Fowler
 50 Higuera Street
 San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☐ newsletter ☒ someone told me about it ☐ other: _____



Earp, K. L., General Manager Four Seasons Resort

Comment 1 Traffic Circulation

The five proposed Cabrillo Boulevard/Hot Springs Road Interchange configurations all provided for a new southbound on-ramp from Cabrillo Boulevard to capture traffic now traveling southbound on Coast Village Road to access the freeway.

Earp, K. L., General Manager Four Seasons Resort

Comment 2 Configuration Preference

The Project Development Team has selected the F Modified configuration for Cabrillo Boulevard/Hot Springs Road Interchange. This configuration does include north and southbound on- and off-ramps.

LAW OFFICE OF MARC CHYTILO

ENVIRONMENTAL LAW

July 9, 2012

Matt Fowler, Senior Environmental Planner
Environmental Analysis
California Department of Transportation
50 Higuera Street
San Luis Obispo, CA 93401

By email to South.Coast.101.HOV@dot.ca.gov

Re: South Coast 101 HOV Lanes Project – Draft Environmental Impact Report/Environmental Assessment

Dear Mr. Fowler,

We submit these comments on behalf of our office, which represents numerous clients in Montecito and Santa Barbara that will be affected by the South Coast 101 HOV Lanes Project ("Project"). We also submit these comments on behalf of the Gaviota Coast Conservancy and the Naples Coalition, two Santa Barbara based non-profits dedicated to protecting the Gaviota Coast from urbanization, and who are concerned that the Project will facilitate this urbanization and contribute to the loss of scenic vistas and open space lands.

It is evident that the DEIR fails in its fundamental purpose of advising the interested and affected communities of the project's potential impacts and identifying potentially applicable mitigation measures that could lessen or avoid the project's multiple significant impacts.

The project would irrevocably alter the visual character of the South Coast, and while nominal mitigation measures are identified, other measures are available that can further mitigate the impacts to visual resources that cannot be avoided and reduced through design revisions. Specifically, the project should secure through conservation easements and fee acquisition available open space lands to achieve permanent protection of compensatory open space and visual resources. Where possible, this should be achieved in the project corridor, however the extraordinary project footprint, and commensurate condemnation of private parcels, will likely cause escalation of land costs and reduce available open space lands for permanent preservation. Consequently, the project should identify and permanently protect lands on the Gaviota Coast from development as a mitigation strategy for reducing project's significant impacts to open space and visual resources.

We urge you to recirculate the draft EIR to correct fundamental errors in the document and obtain additional public and agency input. Specific errors and omissions in the draft EIR that merit correction in a revised EIR are as follows:

- *101 In Motion* concluded that traffic congestion along our stretch of the 101 could only be alleviated with an overall package consisting of five elements including: 1) add a lane and

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Mr. Fowler, Caltrans
July 9, 2012
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a train (a carpool/HOV lane and commuter rail service), 2) facilitate transit and carpool use, 3) use demand management strategies, 4) improve operations and communication, and 4) select operational improvements north of Milpas Street. (See DEIR p. 3). The Project however includes only one component of the first element. CEQA requires that an EIR analyze the "whole of an action" giving rise environmental impacts and prohibits "piecemealing" a project into smaller pieces to avoid thorough environmental review. (CEQA Guidelines § 15378, see *Burbank-Glendale-Pasadena Airport Authority v. Hensler* (1991) 233 Cal. App. 3d 577, 592). Accordingly, the Project Description must be broadened considerably to include or at the very least fully account for the other elements of 101 In Motion.

- The Milpas to Hot Springs 101 Operational Improvements Project is now complete, however was not part of the environmental setting utilized in the draft EIR. As a result the environmental setting does not reflect current conditions, and projections and conclusions regarding traffic operations are not supported by substantial evidence. The various technical analyses, which require revisions due to numerous additional flaws, must be revised to account for this significant change in Highway 101.
- The draft EIR briefly refers to bike and pedestrian improvements without describing them or how they would integrate with the Project. Conclusory statements that the Project, including during construction, will not impact existing pedestrian or bike facilities or interfere with planned future improvements are unsupported by evidence and does not reflect any site-specific analysis. The draft EIR must be revised to describe existing and proposed bike and pedestrian facilities, include a site-specific analysis of the Project's impacts to these facilities including during construction, and include mitigation measures as necessary to off-set adverse impacts to these facilities including funding for bike, pedestrian, and transit facilities.
- The draft EIR concludes that "implementation and construction of the proposed build alternatives or No-Build Alternative would not have long-term effects on land uses in the project area; therefore, no mitigation is required" (p. 42). This conclusion is not supported by substantial evidence in the record, and in fact, it is undeniable that the Project will induce demand on Highway 101 and be growth inducing, affecting land use patterns. Whether or not the South Coast is "built out" is not dispositive, as the Project could result in increased development in North County for example, increasing congestion along 101 north of the Project area, with potential adverse effects on the resources of the Gaviota Coast. The draft EIR requires wholesale revision with respect to land use impacts and growth inducement, and the incorporation of mitigation measures including funding for rural land protection.
- The draft EIR has no basis for assuming no induced demand of 101 associated with the Project. "A growing body of research has shown that widening highways is only a temporary solution at best to the complex problem of traffic congestion. Indeed, research has pointed to a phenomenon known as "induced traffic" that suggests new and wider

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highways actually create additional traffic, above and beyond what can be attributed to rapid population increases and economic growth.” Surface Transportation Policy Project, at <http://www.transact.org/Ca/congestion2.htm>. This is aptly demonstrated, quantified and analyzed in “Generated Traffic; Implications for Transport Planning,” Todd Litman (2001), *ITE Journal*, Vol. 71, No. 4, Institute of Transportation Engineers (www.ite.org), April, 2001 (attached as Exhibit 1)¹. See also *Conservation Law Found. v. FHA*, 630 F.Supp. 183, 211-215 (EIS ignoring induced population growth inadequate); also *Sierra Club v. DOT*, 962 F.Supp. 1037 (N.D. Ill., 1997). Santa Barbara County RHNA numbers indicate that each municipal jurisdiction in the County, and the County itself, will increase housing stock. In the absence of residency restrictions on occupancy, the increased freeway capacity will enable more long-distance commuting to Ventura and Los Angeles areas. The entire traffic, circulation, air quality, land use and public health analysis is flawed and incomplete, and requires revision and substantial strengthening before it could meet CEQA and NEPA’s standards for adequacy.

- The draft EIR must be revised to include additional proposals for avoiding the substantial amount of vegetation loss including coast live oaks and visually iconic median landscaping associated with the Project. Additionally revisions should include proposals for avoiding an amendment to the wetland buffer policies. Proposals that do not include widening 101 along the entire Project area, but rather selective widening, operational improvements, together with substantial improvements in alternative transportation including the commuter rail line, could preserve key biological and visual resources while still attaining the Project’s basic objective.
- The Highway 101 corridor is a path of access for many to enjoy coastal resources. Many surf breaks and isolated beaches are accessed under highway culverts and from along existing highway facilities, such as Fernald Point, Serena’s, Summerland and many

¹ Academic review include the following, incorporated herein by reference: Roger Gorham (2009), *Demystifying Induced Travel Demand*, Sustainable Transportation Technical Document, Sustainable Urban Transportation Project (www.sutp.org). Available at: www.sutp.org/index2.php?option=com_content&do_pdf=1&id=1461
Kent M. Hymel, Kenneth A. Small and Kurt Van Dender (2010), “Induced Demand And Rebound Effects In Road Transport,” *Transportation Research B* (www.elsevier.com/locate/trb).
ICF Consulting (2005), *Handbook on Integrating Land Use Considerations Into Transportation Projects to Address Induced Growth*, prepared for AASHTO Standing Committee on the Environment. Available at: [www.trb.org/NotesDocs/25-25\(3\)_FR.pdf](http://www.trb.org/NotesDocs/25-25(3)_FR.pdf).
Todd Litman (2010), *Changing Vehicle Travel Price Sensitivities: The Rebounding Rebound Effect*, VTPI (www.vtpi.org); at www.vtpi.org/VMT_Elasticities.pdf.
Robert B. Noland and Lewison L. Lem (2002), “A Review of the Evidence for Induced Travel and Changes in Transportation and Environmental Policy in the US and the UK,” *Transportation Research D*, Vol. 7, No. 1 (www.elsevier.com/locate/trd), January, pp. 1-26.

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others. The EIR is inadequate for failing to comprehensively document all coastal access ways in the project area, including the project's effects on the Coastal Trail. The EIR fails to address Caltrans' mandate regarding the siting of the Coastal Trail, and its particular responsibilities under the California Coastal Conservancy's 2003 Report to the Legislature, Completing the Coastal Trail. "Assist Caltrans in evaluating and improving nonmotorized access opportunities along the Highway 101 corridor between Rincon Beach County Park and Carpinteria State Beach." Attached as Exhibit 2. Where avoidance cannot be achieved, mitigation is required in the form of compensatory coastal access improvements.

- The project will result in increased air pollution exposure to communities along the highway. The noise, light and pollution will make communities along the highway less desirable to the affluent members of the community, thus more affordable and populated by persons of lower economic means, with a commensurate increase in people of color and ethnic minorities. The EIR fails to identify this significant impact and introduce means to avoid or lessen these impacts, and sanctions knowing disproportionate impacts upon these sensitive populations. Note that recently the City of Santa Barbara adopted policy and ordinance language prohibiting new residences within 250 feet of Highway 101 due to the evidence of increased air pollution exposure. This air pollution includes tailpipe as well as other emissions - brake and clutch lining, tire and entrained dust, and of course diesel exhaust emissions. The EIR fails to identify and avoid these toxic air pollution exposures and disproportionate effects upon disadvantaged populations. See Exhibit 3, Key studies on air pollution and health effects near high-traffic areas, Compiled by the Environmental Law and Policy Center and the Sierra Club.
- Unfortunately, the proposed DEIR fails in its fundamental purpose of disclosing potential adverse environmental impacts to inform the public and affected communities, then to avoid and reduce the significance of such impacts through mitigation and other strategies. We implore Caltrans to revise its draft environmental review document to address public concerns and

Respectfully submitted,

LAW OFFICE OF MARC CHYTILLO

Marc Chytילו
Ana Citrin

Mr. Fowler, Caltrans
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Exhibit 1: "Generated Traffic; Implications for Transport Planning," Todd Litman (2001), *ITE Journal*, Vol. 71, No. 4, Institute of Transportation Engineers (www.ite.org), April, 2001.

Exhibit 2: California Coastal Conservancy's Report to the Legislature pursuant to Senate Bill 908 of 2001, Completing the Coastal Trail, 2003.

Exhibit 3: Key studies on air pollution and health effects near high-traffic areas, Compiled by the Environmental Law and Policy Center and the Sierra Club.

Law Office of Marc Chytilo

General Response

Three attachments were submitted as part of Mr. Chytilo's comments and are listed below:

- Victoria Transport Policy Institute; *Generated Traffic and Induced Travel; Implications for Transport Planning*
- Coastal Conservancy; *Completing the California Coastal Trail*
- Environmental Law and Policy Center and the Sierra Club; *Key Studies on Air Pollution and Health Effects Near High-Traffic Areas*

Law Office of Marc Chytilo

Comment 1 Aesthetics and Design

The draft environmental document identified significant visual impacts to locations only within close proximity of the U.S. 101 corridor and within the project limits. The increased urbanized appearance related to visual impacts caused by the project would not be avoided, minimized, or mitigated by the creation of offsite conservation easements or open space. Furthermore, all widening would occur with the available right-of-way.

Law Office of Marc Chytilo

Comment 2 101 In Motion

The project is a result of the *101 In Motion* report that proposed an HOV lane and was one of the solutions in a package designed to relieve congestion. The other three main components of the package were commuter rail, increased bus services, and operations improvements. These other elements are all outside the scope of the South Coast 101 HOV Lanes project, but are noted in Chapter 1 as background.

Law Office of Marc Chytilo

Comment 3 Existing Conditions

Although the existing traffic data was taken prior to construction of the Milpas to Hot Springs Improvement project, the post project conditions were included in the forecast analysis for 2040.

The traffic diversion plan for 2040 took into account the Milpas Operations Improvement project and the closure of the southbound on-ramp. Refer to the Traffic Diversion Rules, established in the Cabrillo/Hot Springs Road Interchange Configuration Analysis, dated March 21, 2011, pages 9 and 10.

Furthermore, the Forecast Operations Report, page 8 identified the 101 Operational Improvement project, among others, and noted that "the northern limit of the project will connect to the adjacent Route 101/Milpas Street to Hot Springs Road operational improvement project (EA 05-44780)."

Law Office of Marc Chytilo

Comment 4 Bicycle and Pedestrian

The proposed project would not have permanent effects on parking, bike facilities or pedestrian facilities, including the Pacific Coast Bike Route. Construction of the overall six-lane facility would reduce vehicle traffic on the local street system by those seeking to avoid U.S. 101 congestion. This reduction of through traffic onto the local streets is expected to benefit bicycle, pedestrian and local transit users that depend on the local street system for travel. The project will maintain continuity of any existing bike and/or pedestrian paths at the time of construction and would not interfere with any future planning bike and/or pedestrian paths. See Figure 2.2 and Section 2.1.5 for more information.

Law Office of Marc Chytilo

Comment 5 Land use and Growth

Caltrans has no control over land use decisions in the region which can have significant impact on growth. All traffic volume projections are based on the Santa Barbara County Association of Governments' countywide regional model, which takes into account land use and development planned or forecasted in the region. The project is designed to provide relief and serve latent demand (recurring traffic already stuck in congestion during peak commute hours between Ventura and Santa Barbara County, from 6:00 a.m. to 9:00 a.m. and 3:00 p.m. to 6:00 p.m.), and all traffic demands are captured in the regional model. This region also does not have any viable local parallel routes to attract local traffic onto the freeway like large metropolitan areas. In addition, the Growth Study determined there would be minimal growth pressures, furthermore, they would be less than planned growth rates of communities within the study area. For more information on growth, refer to Volume I, Section 2.1.2.

Law Office of Marc Chytilo

Comment 6 Induced Demand

All traffic volume projections are based on a Santa Barbara County Association of Governments' countywide regional model, which takes into account land use of both planned and forecasted development in the region. The project is designed to relieve and serve latent demand (recurring U.S. 101 traffic already stuck in congestion during peak commute hours between Ventura and Santa Barbara County), and all traffic demands are captured in the regional model. The South Coast 101 HOV Lanes widening project spans 10.3 miles of freeway. The study area encompasses 27.5 miles of U.S. 101. The southern limit of the traffic study begins at post mile 0.0 (south of the Rincon Point/Bates Road Interchange), while the northern limit concludes at post mile 27.5 (north of the Hollister Avenue Interchange). See the South Coast 101 HOV Traffic Study

– Forecast Operations Report, page 8. Furthermore, the *101 In Motion* report also studied long-term solutions to the growing congestion throughout the U.S. 101 corridor in southern Santa Barbara County. As a result of the *101 In Motion* process (refer to Section 1.3.3 of the draft environmental document), an HOV lane was one of the solutions in a package designed to relieve congestion.

Law Office of Marc Chytilo

Comment 7 Design

The draft environmental document identified three entirely different project alternatives to meet the purpose and need. One main difference between alternatives is the amount of existing vegetation and wetland areas that would be affected. The draft environmental document offers and discloses a clear distinction between project alternatives in terms of where the widening would occur and its relationship to the median landscaping and roadside landscape preservation. Alternative 1 was developed as a hybrid solution; it would preserve landscaping either in the median, along the roadside, or both, based on community aesthetic preferences and other resources that might exist in these areas.

Many of the existing wetlands formed from the constructed drainage swales associated with the original freeway construction. These lie parallel to and a few feet away from the freeway pavement. There is no reasonable alternative that keeps proposed improvements outside the wetland buffer. This is also true for natural channels that the freeway alignment crosses.

Law Office of Marc Chytilo

Comment 8 Coastal Trail

Culverts installed by Caltrans are not designed or intended for public access and should not be used as such.

Caltrans' role in planning, developing, constructing, and maintaining any portion of the Coastal Trail as an independent and separate trail system, on or off the highway right-of-way, is outside the scope of this project. In addition, SBCAG is currently pursuing constructing the Rincon Bike Path and the Santa Claus Lane Path. The trail concept is to provide continuous or near-continuous access to the state's coastline by a variety of non-motorized modes in a manner that is compatible with site conditions, land uses, and nearby recreational opportunities or attractions. State law further requires that, to the extent feasible and consistent with its mandate, Caltrans shall "cooperate with the Conservancy with respect to the planning and making lands available for completion of the Trail." Caltrans' responsibility with respect to the trail extends to cooperating with the Coastal Conservancy in planning or making lands available as that agency develops the trail, to the extent feasible with the Department's mandate, and notifying the Conservancy of excess property available for completion of the trail; Caltrans' responsibility for implementation, construction and maintenance of the trail, or for acquiring private property for the trail is not mandated.

The referenced 2003 report to the legislature recommended the state legislature should assist Caltrans in evaluating and improving non-motorized access opportunities along the U.S. 101 corridor between Rincon Beach County Park and Carpinteria State Beach. The SBCAG has chosen to move non-motorized traffic to the parallel local streets, currently identified as the California Pacific Coast Bike Route from Summerland south to Bailard Road. This location is preferable to being right next to freeway traffic as per the 2003 report directives. From Bailard Road south to Mussel Shoals, the freeway corridor is currently under construction to add HOV lanes and construct appropriate non-motorized access along the freeway corridor under approval of a Coastal Development Permit. These two actions effectively complete continuity of the trail for the segment identified in the 2003 report associated with the freeway corridor within Santa Barbara County.

The environmental document analyzed coastal access in terms of the pedestrian and bicycle facilities identified as the Pacific Coast Bike Trail, City of Santa Barbara's Pedestrian Master Plan (July 2006), and Santa Barbara County Association of Governments' Draft Regional Bicycle Plan dated April 2008. Furthermore, the project is not affecting nor would it preclude any existing or known planned pedestrian and bike facilities within the project limits. With no impacts cited, no mitigation to these facilities is required (see Section 2.1.5).

Law Office of Marc Chytilo

Comment 9 General Comment

Generally speaking, most of the communities paralleling the project limits tend to be made up of populations that are on the higher end of the economic scale. This is consistent with demographic data available for the area (refer to Volume I, Section 2.1.3). With its coastal location and close proximity to Santa Barbara, this trend will likely continue.

According to the Air Quality Report prepared September 2011 and the addendum to the Air Quality Report prepared 2013, the project would not result in significant air quality impacts. Furthermore, since the project will relieve traffic congestion within the corridor, the additional HOV lane coupled with fleet turnover over time that meet the Environmental Protection Agency's vehicle and fuel regulations, the regional air pollution time would see a substantial decrease in mobile source air toxics. Refer to Volume I, Sections 2.2.6 and 2.5 in the final environmental document for discussion of air quality minimization measures and Caltrans Standard Specifications that would decrease operational air emissions during construction. Refer to Section 2.2.6 for discussion of entrained dust.

As it relates to the City of Santa Barbara's General Plan Policy ER7, the project will widen in areas within the median as well as to the outside of the existing lanes. The shift would be about 12 feet on either side of the freeway and would not affect the development potential of parcels next to the highway.



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July 9, 2012

Matt Fowler, Senior Environmental Planner
Caltrans District 5
50 Higuera Street
San Luis Obispo, CA 93401
South.Coast101@dot.ca.gov

Subject: Draft Environmental Impact Report/Environmental Assessment; South Coast HOV Lanes

Dear Mr. Fowler:

Thank you for the opportunity to comment on the above referenced Draft Environmental Impact Report (DEIR)/Environmental Assessment (EA).

The Coalition for Sustainable Transportation (COAST) is a Santa Barbara County not-for-profit organization that promotes rail, bus, bike and pedestrian access. We provide advocacy, education and outreach to local and regional government agencies, as well as the general public in order to improve transportation policies and funding for active transportation infrastructure and programs.

Local residents, commuters and other travelers have long ago identified capacity limitations on the Highway 101 corridor between the cities of Santa Barbara and Ventura. In 2004 the Santa Barbara County Association of Governments (SBCAG) organized a broad-based planning process ("101 In Motion") to address long-term congestion and mobility deficiencies in the corridor. The final report, issued in 2006, called for the addition of an HOV highway lane in each direction –the subject of this document- plus the development of a commuter rail system between Camarillo/Oxnard and Goleta. Consequently, the renewal in 2008 of a local sales tax for transportation purposes ("Measure 'A'") contained an expenditure plan designed to facilitate the funding of these recommendations.

The HOV lane project implements a key piece of the overall solution recommended by 101 In Motion, albeit not the only one. Rail service should not only be mentioned as background in the DEIR but it must also be included in the cumulative project list, together with regional bus service, demand management programs and other operational improvements in the pipeline and already determined as feasible. Furthermore, 101 In Motion identifies expected and unavoidable impacts of highway capacity expansion on interchanges and adjacent local streets, such as the Carrillo St. and Mission St interchanges., that are already running at full capacity. Therefore commuter rail and regional transit should be incorporated and implemented as effective ways to mitigate congestion during construction and to avoid some of the long-term impacts on surface streets that will otherwise result from a 50% increase of highway capacity at peak hour.

1

In the last two decades Santa Barbara's regional transportation authority (SBCAG) and the local agencies have adopted plans and policies addressing the need to maintain and improve transit, rail, bicycle and pedestrian access in accordance to local, state and federal mandates, among them: Santa Barbara County Regional Transportation Plan; SBCAG's Regional Bicycle Plan; City of Santa Barbara's Circulation Element; Santa Barbara County, City and Carpinteria Local Coastal Plans. Consistency with these documents merits specific discussion in the EIR:

Coastal Act Section 30001.5: "Maximize public access to and along the coast and maximize recreational opportunities in the coastal zone consistent with sound resources conservation principles..."

Coastal Act Section 30252: "Maintenance and enhancement of public access: The location and amount of new development should maintain and enhance public access to the coast ..."

Santa Barbara City Local Coastal Plan Policy 3.14: "All improvements to Highway 101 shall be designed to provide as appropriate benefits (such as improved public access across and along the highway corridor to the waterfront, beach, and other recreation areas) and limit negative impacts (such as increased visibility of the freeway structure, increased noise or glare, or restricted access) to nearby recreational facilities within the Coastal Zone (e.g., Municipal Tennis Courts, the Child's Estate (Santa Barbara Zoo), Andree Clark Bird Refuge, beaches, harbor, waterfront area)."

Santa Barbara City Circulation Element, pg.9-2: "... there is limited transit and other access to the Waterfront and Coast Village Road from the Eastside, Westside, and Downtown areas of the City. Highway 101 physically separates the Waterfront from the rest of the City, leaving only a few access points. As a result, these access routes are becoming increasingly congested. It is important to ensure that coastal access is maintained in the most efficient manner possible."

Coastal access is an important land use and recreation priority of the Coastal Act. Degradation and impediments to access constitute land use and recreation impacts. The DEIR/EA includes general mitigation for construction disruptions to pedestrians and bicyclists, as well as compliance with the Americans with Disabilities Act (ADA) for areas where the project proposes local-street changes. Specific analysis of impacts and mitigations for specific routes and conflicts with pedestrian and bicycle plans and policies are absent and need more specific analysis.

Section 2.1.5 ("Traffic and Transportation/Pedestrian and Bicycle Facilities") includes a description of the Federal Highway Administration (Code of Federal Regulations 652) and Caltrans mandate to give "full consideration to pedestrian and bicyclist during the development of federal-aid highway projects. Therefore, a complete review of any potential impacts to pedestrians and bicyclists needs to be included in the EIR/EA, not solely the ADA impacts.

Existing pedestrian and bicycle facilities and those planned for the near future need more specific analysis and impact review in the EIR/EA, including:

1. The Class I bikeway between Ortega Hill and North Jameson Lane.
2. The portion of the Pacific Coast Bike Route that is located in the project area.
3. SBCAG's proposed sidewalk from the existing Cabrillo Boulevard roundabout to the Andree Clark Bird Refuge.

4. Other pedestrian and bicycle circulation projects within the project area, as identified in policy and program documents.

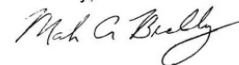
The EIR/EA must also consider direct and indirect impacts to non-motorized circulation generated by physical changes resulting from the project, the impacts of construction, and impacts of road capacity expansion. The document needs to include additional specific discussion of recreational trail and bicycle access throughout the corridor, referencing specific local studies and policies, identifying both potential impacts and opportunities. A bike/pedestrian path connecting Santa Claus Lane with western Carpinteria Avenue, and another one connecting the eastern end of Carpinteria Avenue with Rincon County Park would mitigate some of these impacts and would not foreclose upon this important opportunity, already identified by the City of Carpinteria and supported by COAST.

Regarding the different proposals for the Cabrillo/Hot Spring interchange, we consider F-Modified the superior alternative because it has the potential to decrease certain significant impacts of the project and to best achieve consistency with coastal, regional, and community goals. As compared to the other options analyzed in the draft document, Option F-Modified most closely retains existing circulation patterns and direct access to Montecito neighborhoods, Coast Village Road, and the Cabrillo coastline recreational area.

However, the existing Union Pacific rail trestle constraining Cabrillo Boulevard to a width of 30' represents a formidable obstacle to pedestrian and bicycle circulation between the waterfront and Coast Village Road. The proposed southbound on-ramp will likely worsen an already unsafe condition. Section XVI.f of the CEQA check-sheet directs an analysis of potential impacts due to a "Conflict with adopted policies plans or programs regarding public transit, bicycle, or pedestrian facilities, or that otherwise decreases the performance or safety of such facilities". Any interchange improvement must address this deficiency as part of the project and leave absolutely no ambiguity as to its resolution.

Thanks again for the opportunity to comment on this document.

Sincerely,



Mark Bradley, President
Coalition for Sustainable Transportation (COAST)

Coalition for Sustainable Transportation (COAST)

Comment 1 101 In Motion and Cumulative Projects

Caltrans, the Santa Barbara County Association of Governments, and several other state and local agencies have worked together to develop the “South Coast Highway 101 Deficiency Plan” (2002) and the “101 In Motion Plan” (2006). These plans analyzed several options for improving circulation within the U.S. 101 corridor, including widening the highway by adding travel lanes in each direction and the addition of a High Occupancy Vehicle (HOV) lane in each direction. Congestion relief was also analyzed in the Regional Transportation Improvement Plan (RTIP); this plan also recommended adding lanes and implementing a peak hour HOV lane.

Proposed rail projects in the vicinity of the South Coast 101 HOV Lanes project have been added to the cumulative projects list in Section 2.5 of the final environmental document. Discussion related to traffic impacts to interchanges outside of the project limits is provided in Section 2.1.5.

Coalition for Sustainable Transportation (COAST)

Comment 2 Consistency with Plans

Please refer to comment 1. The project is consistent with most of the local policies COAST has cited. These are discussed in Sections 2.1.1.2 and 2.1.1.3 of the final environmental document. The project is potentially inconsistent with the City of Carpinteria Local Coastal Plan and County of Santa Barbara Local Coastal Plan. This situation will be rectified once the local coastal plan amendments are completed for both jurisdictions.

Coalition for Sustainable Transportation (COAST)

Comment 3 Bike and Pedestrian Circulation

Refer to the general response prepared for the California Coastal Commission earlier in this appendix for further discussion related to coastal access. The project as discussed in Section 2.1.5 of the final environmental document will

comply with the Americans with Disabilities Act requirements for any necessary construction on the bike/pedestrian trails as well as sidewalk locations interfacing with local roads. The Rincon Coastal Trail and the Santa Claus Lane Bike Path are being pursued by the Santa Barbara County Association of Governments and will continue to be processed separately from the South Coast 101 HOV Lanes project, but will remain integral to one another.

Coalition for Sustainable Transportation (COAST)

Comment 4 Bike and Pedestrian Circulation

Please refer to Volume 1, Section 2.1.5 for more information on bicycle and pedestrian routes. The project would facilitate pedestrian and bicycle access by ensuring all bike and pedestrian facilities are retained or replaced as necessitated by the project.

The following text has been added to Section 2.1 of the final environmental document to expand on separate regional enhancements that would improve public access to coastal resources: “As a result of ongoing discussions after release of the draft environmental document, the Santa Barbara County Association of Governments has taken the lead on two separate projects that will be part of the Local Coastal Plan Amendment package for the City of Carpinteria. The Local Coastal Plan Amendment process is moving forward for two projects—the South Coast 101 HOV Lanes project and the Linden and Casitas Interchanges Improvement Project. The first of the regional enhancement projects is the Coastal Route Bike Path that will extend from Santa Claus Lane to Carpinteria Avenue. This Class I path will close a coastal trail gap. The second of these enhancements is the Rincon Coastal Trail that will extend from Carpinteria Avenue to Rincon County Park. The proposed improvement will close the coastal trail gap between Carpinteria Avenue and the new Class I trail along U.S. 101 at Rincon. The project would facilitate pedestrian and bicycle access by ensuring all existing paths in the project

limits are retained or replaced as necessitated by the project. During project construction bicycles, pedestrians and persons with disabilities would have continued access through construction areas. As noted under the Avoidance, Minimization and/or Mitigation heading in Section 2.5, “During all temporary closures, detour routes would be provided for vehicles, pedestrians and bicycles.”

Coalition for Sustainable Transportation (COAST)

Comment 5 Bike and Pedestrian Circulation

- 1) Bicyclists and pedestrians are not users of the freeway in the project limits except for the recent trail constructed along Ortega Hill Road. That recently constructed trail will not be affected by the proposed project.
- 2) The Pacific Coast Bike Route through the project limits runs generally along local roads. This information is discussed in Volume I, Section 2.1.5.
- 3) The proposed sidewalk/path from the improvements proposed with the F Modified configuration to the Andree Clark Bird Refuge will occur as a separate project with SBCAG and the City of Santa Barbara taking the lead on its design and implementation. Improvements proposed within the State right-of-way associated with the F modified configuration will include Americans with Disabilities Act-compliant ramps, as necessary with the construction of the new on- and off-ramps. Bicycle and pedestrian facilities on both sides of Cabrillo Boulevard within the State right-of-way are also proposed as part of the F modified configuration. These improvements will be designed to connect with existing and other future planned bicycle and pedestrian facilities.
- 4) Refer to response to comment 3 above.

Coalition for Sustainable Transportation (COAST)

Comment 6 Bike and Pedestrian Circulation

Following release of the draft environmental document, the Rincon Coastal Trail and the Santa Claus Lane Bike Path are being pursued by the Santa Barbara County Association of Governments and will continue to be processed separately from the South Coast 101 HOV Lanes project, but will remain integral to one another. In addition, these two separate projects will be included as part of the Local Coastal Plan Amendment package for the City of Carpinteria. The Local Coastal Plan Amendment is currently being processed by the City of Carpinteria to accommodate the Linden Avenue and Casitas Interchanges Improvement project and the South Coast 101 HOV Lanes project.

Coalition for Sustainable Transportation (COAST)

Comment 7 Cabrillo Boulevard/Hot Springs Road Interchange

As a result of public comment on the draft environmental document, the Project Development Team has selected the F Modified configuration for the Hot Springs/Cabrillo Interchange.

Coalition for Sustainable Transportation (COAST)

Comment 8 Traffic

The Coastal Development Permit issued for the Milpas to Hot Springs Operational Improvement project included a pedestrian/bicycle path as a condition of approval. The project proposed to build a tunnel under the railroad that ultimately was not allowed by Union Pacific Railroad. The City of Santa Barbara has taken the lead on the preliminary design of a project that would replace the railroad bridge and provide improved bicycle and pedestrian access. SBCAG will provide funding for the preliminary design work and will continue seeking additional funds. This project is being handled separately from the South Coast 101 HOV project and will have its own environmental document.

April 22, 2012

Scott Eades
Department of Transportation
District 5 – Program/Project Management
50 Higuera Street
San Luis Obispo, CA 93401-5415

Widening of HWY 101 @ Summerland, CA

Scott Eades,

As a follow-up to my letter to you dated January 25, 2012, I am writing to you to confirm that the Cottages at Summerland (20 homes) and Villas at Summerland (10 homes) will be responding to the *Draft Environmental Impact Rept/Environmental Assessment for the South Coast HOV project* dated March 2012 and appeal any adverse findings and conclusions reached by Caltrans.

Since that meeting, we have taken sound readings for each of our home sites to add to and substantiate Caltrans excessive noise level findings and take issue with the noise finding results and conclusions reached. In addition, we believe that the draft noise study does not take adequate account of the county park located across and in front of our entire development. This County owned park (used extensively daily – 7 days a week) serves the nearby communities of Carpinteria, Summerland and Montecito and in addition, provides both a walking and horse trail which are used extensively as a connector to horse and walking trails which surround our development and connect to the surrounding city's of Montecito and Carpinteria.

As I had mentioned previously, we are proud of our County owned Park, which is maintained by our development and recently County Parks with our approval have granted permission for the park to be used for an upcoming wedding ceremony and party gathering.

In addition, there is a residential development (nine home sites with all roads and infrastructure completed) located to the East and North - directly above our two developments. Two homes are in the process of submitting for building permits. Four of these home sites have a direct view of HWY 101 and will be affected by the noise caused by the proposed widening.

As you are aware, in 2009, home owners in our development followed up with letters to Caltrans stating their reasons for the need of such a sound wall. One hundred percent (100%) of our development ownership has approved its construction in order to help elevate the noise coming from the traffic on HWY.101 - which is a constant roar and has become unbearable. The adding of a 3rd lane will only add to the traffic noise since there is little to no landscaping located in front of our development to absorb or redirect the constant traffic noise. Today peak traffic hours, traffic is slowed to substantially lower levels but the sound is still deafening. Once the additional lane is added, the traffic noise will increase to an unbearable level, which today has become intolerable.

As a follow-up, each of our home owners will "AGAIN" express their concerns and I will be forwarding these on to you for Caltrans consideration to approve this needed sound wall for our developments the county park's acceptable well being.

Upon Caltrans receipt of our appeal and its careful and thorough evaluation of same, we would appreciate your re-evaluating your decision regarding placement of a sound wall in front of our development and look forward to our meeting again to accomplish this request.

Look forward to our meeting again at the Montecito and Carpinteria Caltrans meetings scheduled for April 24th and 25th.

Sincerely,

Robert Sizlo
President of The Cottages at Summerland Owner's Association

The Cottages at Summerland Owner's Association (Robert Sizlo, President)

Comment 1 Noise Calculations

Additional modeling scenarios were done using the ground patios, the upper-floor patios, with and without the suspect calibration adjustment with no homes at the second row (or the new upper-development ground levels) level receiving 5 dBA of benefit from a soundwall, which is a requirement for those homes to be counted as benefitted with the installation of a soundwall. The nine home sites and the two homes that are in building permit process were included in the noise modeling were found to not be benefitted by a wall. The public park that fronts the Summerland Cottages development was reevaluated and found to be a length that qualifies for seven additional frontage units that would be benefitted by a soundwall.

Even with the inclusion of the additional frontage units included to represent the park, Soundwall S374 continues to be financially unreasonable and is not recommended for construction. In addition, it was also determined that a soundwall in this location would block prime ocean views and as a result would not be recommended for construction due to severe visual impacts.

Soundwall S374 not being proposed for construction results in several locations where severe receptors are present with no proposed soundwalls. This condition has occurred due to prime ocean views being blocked by a soundwall or floodways being blocked by a soundwall. In these cases, providing acoustical treatment on private property or soundwalls on county property, if appropriate, will be considered in coordination with the property owner. Acoustical treatment on private property might include insulation, dual paned windows, air conditioning or private walls.

Please refer to Observer Viewpoint 7 in Section 2.1.6, Volume I, for discussion of prime ocean views in Summerland and Section 2.1.7 for more details on Soundwall S374.

The Cottages at Summerland Owners' Association

C/o Kennedy Accounting Systems
1322 De La Vina Street
Santa Barbara CA 93101

Matt Fowler,
Senior Environmental Planner,
Environmental Analysis,
California Department of Transportation,
50 Higuera Street,
San Luis Obispo, CA 93401

May 5, 2012

South Coast HOV Project on US Highway 101: Soundwall S374

05-SB-101-PM 1.4 to 12.3 05-0N7000 Project ID# 0500000225 SCH# 2009051018

I am writing on behalf of the Home Owners Association for the Summerland Cottages regarding the *Draft Environmental Impact Report/Environmental Assessment for the South Coast HOV project* dated March 2012 with formal comments due by May 25, 2012.

The environmental evaluation for the proposed project includes analysis of noise based on a Noise Study completed for this project in March 2010. The *Draft Environmental Impact Report* determined the cost of each potential soundwall, and compared the cost with a cost allowance to conclude whether or not each wall was financially viable. Soundwall S374 would protect the community we live in.

We are concerned that the recommendation for soundwall S374 is not to build due to it not being "financially reasonable" (page 341). We therefore request that Caltrans staff investigate three topics:

1. The application of a noise calibration factor to eight homes.
2. The frontage unit count associated with Oceanview Park.
3. Additional homes planned to be constructed before completion of the project.

1. Calibration Factor

The complex topography in our development coupled with decks and balconies mean noise levels cannot be accurately evaluated with a few noise readings. Only two locations had noise readings taken for our development.

The Noise Study Report under Short-term Monitoring, page 24, describes, for these very reasons, how more actual sound readings were necessary for the balance of Summerland. The question is why the same level of effort was not conducted for soundwall S374 with similar conditions?

Our development comprises 30 homes in two rows. Noise monitoring station ST15 was placed among first row homes and station ST15A was placed to represent second row homes. For second row homes, the table on page 296 shows that calibration factor K6 was used to reduce the computer modeled noise levels by 2.5 dB to match field measurements taken at ST15A. The photographs on page 252 of the *Noise Study Report* show that this monitoring station was placed just inside the curb and gutter in a bushy landscaped area directly behind one of the first row homes. Direct readings at this location were compared to modeled values, with the direct readings being 2.5 dB lower.

The effect of the K6 calibration adjustment is to reduce the modeled noise levels below the 67 dB noise abatement threshold and therefore to exclude all second row homes from the count of units that would benefit from the soundwall.

While this adjustment to the modeled noise level is an accurate assumption for someone standing in the bushes at the curb, this is not representative of an outdoor activity area.

Page 291 of the report says of this part of Summerland "*Many of the second- or third-row houses (Activity Category B) north of U.S. 101 sit on the hillside, with a deck or a multi-level terraced backyard overlooking the ocean; these structural features can be considered as frequent outdoor use areas.*" The methodology of the Noise Study does not, however, reflect this for our development.

The second row homes in our development are on an elevated hillside. The prime outdoor use areas are decks and balconies on each home that look out over the first row homes to the ocean, with direct views of traffic. Seven of these eight homes are two storey, and in each case has the deck and living space on the second level of the home for this reason. These decks represent an extension of the living areas and are the most important outdoor living area to be protected. They are the reason why the homes were purchased.

The modeling point for the second row homes therefore should have been at the deck level and not on the ground level, in the bushes, exactly lined up with houses in front to block noise.

In addition, on Freesia Drive, two of six second row homes (# 2631 and 2633) actually have no buildings directly in front, due to the vehicle entrance way to our development being in front.

On Caspia Lane, there are two second row homes with no home in front of the relevant area - 2624 Caspia Lane has no private yard to the south and has the outdoor use area, with clear highway views, to the west. This outdoor area and the entire adjacent home in the multi-family units (2620 Caspia Lane) have no buildings in front due to the visitors' car park and footpath from Oceanview Park to the development being in front.

We therefore believe that calibration factor K6 has been misapplied to the six homes on Freesia Drive* and to two homes on Caspia Lane** and that appropriately positioned monitoring stations would record noise levels at least in line with the modeled results.

To illustrate this point, attached are photographs of these homes that were taken from the south side of Highway 101. Despite the limitations of photographs taken on a busy highway, these clearly evidence direct line of sight between these homes and highway traffic.

2. Oceanview Park and Trails

This Santa Barbara County Park lies between the homes and the highway. This park is listed on the County of Santa Barbara Day Use Parks website but omitted from the list of parks and recreation areas in Table 2.3 (page 57) of the *Draft Environmental Impact Report*. The park runs parallel to the highway for approximately 1,100 feet, comprising 400 feet of lawn and another 700 feet of landscaped trails. Only the first 400 feet of Oceanview Park appear to have been considered in the draft report. This is a permitted public park and must be considered in its entire length. We therefore believe that additional frontage units should be allocated to receptor R49A representing the remainder of Oceanview Park.

While parks, if permitted, should be counted without "human use" confirmation, we feel strongly because the trails are used extensively for walking, dog walking, and horse riding, and connect to both the beach at Padaro Lane and the other trails behind our development that are maintained and documented by the Montecito Trails Foundation.

3. Additional Homes

A development of eight homes is planned on property behind our development and three of these homes (lots 3, 4, and 5) face along the ocean front of that development and would benefit from the soundwall.

* Covered by receptors 47B and 47C.

** Covered by receptors 47D and 48C respectively.

The property subdivisions were recorded with the County of Santa Barbara in 2007, the roads and infrastructure have been completed, and plans for one home (lot 3) were submitted to the County of Santa Barbara Building and Safety Department for permitting (since the Noise Study) in 2011.

These homes are not shown or referenced in the *Draft Environmental Impact Report* and accordingly we do not know whether or not they were considered.

Conclusion

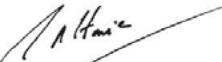
We request that additional noise readings be taken that are representative of where "human activity" actually occurs for the second row, uphill homes in our community. Since they all have direct line of sight from the decks to the traffic, it is assumed that they will all become "benefitted" residents. We would be happy to arrange access for this purpose to the relevant outdoor activity areas on private property.

We request confirmation of Oceanview Park's length, classification under Activity Category B, and the number of frontage units included in the evaluation of soundwall S374.

We request clarification of whether the planned additional homes due to be built behind and above community have been considered.

The draft report compares the cost of soundwall S374 with an allowance of \$444,000 based on 12 units (9 homes and 3 front units from the park) at \$37,000 per unit. Removing the K6 calibration factor from 8 homes and adding 7 frontage units for the remainder of Oceanview Park, would bring the benefitted resident count to 27. At \$37,000 per unit, that would result in a new wall allowance of \$999,000. This allowance compared to the wall construction cost of \$855,400 would make the wall financially reasonable.

With data taken at only two actual locations and the assumed noise levels not accurately reflecting location of outdoor activity, the draft report appears technically flawed for our development. Having a soundwall is incredibly important to the Home Owner's Association and we are willing to retain Parsons to perform the additional necessary work. We would prefer to allow Caltrans the opportunity to re-evaluate and make corrections to the report as necessary concerning soundwall S374.



T.A. Howie
Director

The Cottages at Summerland Owners' Association

Second Row Homes The Cottages Summerland, CA

PHOTOGRAPHIC STUDY

Photographs taken from South side of Highway 101

April 14, 2012



2637, 2639, 2641 and 2643 Freesia Drive, with Margueritte Way (# 2637, 2639 and 2641) and trails area in area in front.



2637, 2639, 2641 and 2643 Freesia Drive, with Margueritte Way (# 2635, 2637, 2639 and 2641), and cyclist on Via Real in front.



2639, 2641 and 2643 Freesia Drive, with 2641 Marguerite Way and trails area in front.



2635 and 2637 Freesia Drive 2629 Caspia Lane in front to left).



2629 Freesia Drive



2629 Freesia Drive with 2637 Marguerite Way in front



2633 Freesia Drive (2629 Caspia Lane in front to left)



2633 Freesia Drive (2629 Caspia Lane in front to left)



2620 Caspia Lane (with 2621 Caspia Lane to the right).



2633 Freesia Drive (with man on patio), behind 2631 and 2633 Marguerite Way



2631 Freesia Drive behind with 2631 Marguerite Way in front.

The Cottages at Summerland Owner's Association (T.A. Howie, Director)

Comment 1 Noise Calculations

Additional modeling scenarios were completed using the ground patios and the upper-floor patios. These were calculated with and without the suspect calibration adjustment. No homes on the second row (or the new upper-development ground levels) received a 5 dBA level benefit from a soundwall, which is a criteria used to classify residences as a benefitted receptor upon installation of a soundwall. The nine home sites and the two homes that are currently in the building permit process were included in the noise modeling. It was determined that these locations would not be benefitted by a wall. Even with the additional benefitted frontage units of the park, Soundwall S374 continues to be financially unreasonable and cannot be recommended for construction. It was further noted in the Visual Impact Assessment and identified in Volume I, Section 2.1.6 that this particular soundwall would block prime ocean views and would not be recommended by the Project Development Team.

Since Soundwall S374 is financially unreasonable and cannot be recommended for construction, there are several locations where severe noise receptors are present without a proposed soundwall (Receptor R49.2). This situation has occurred due to prime ocean views being blocked by a soundwall or floodways being blocked by a soundwall. In these cases, providing acoustical treatment on private property or soundwalls on county property, if appropriate, will be considered in coordination with the property owner. Acoustical treatment on private property might include insulation, dual paned windows, air conditioning or private walls.

Please refer to Observer Viewpoint 7 in Section 2.1.6, Volume I, for discussion of prime ocean views in Summerland and Section 2.1.7 for more details on Soundwall S374.

The Cottages at Summerland Owner's Association (T.A. Howie, Director)

Comment 2 Oceanview Park and Trails

Figure 2-3, Table 2.3 in Volume I, and text in the final environmental document were updated to include the Oceanview Park.

The Cottages at Summerland Owner's Association (T.A. Howie, Director)

Comment 3 Additional Homes

Refer to response for comment 1 above.

**The Cottages at Summerland Owners' Association
The Villas at Summerland Owners' Association**

c/o Kennedy Accounting Systems
1332 De La Vina Street
Santa Barbara, CA 93101
Phone: 805-962-1626
Fax: 805-962-0240

June 26, 2012

CALTRANS DISTRICT 5

Environmental Branch
Attention: Matt Fowler
50 Higuera Street
San Luis Obispo, CA 93401

Re: South Coast 101 HOA Project Comment Card responses sent to CALTRANS

Dear Mr. Fowler,

The Cottages at Summerland (20 homes) and The Villas at Summerland (10 homes) make up the two developments which directly front along the frontage road of Via Real and located between the N/S crossroads of Greenwell Avenue and Padaro Lane.

Please see enclosed individual Comment Card responses from the following Owners:

The Cottages at Summerland

A development of 20 Homes - 19 enclosed Owner responses with addresses noted below:

1. 2621 Caspia Lane – Donna Benaroya
2. 2623 Caspia Lane – Joseph and Dianne Freeman
3. 2624 Caspia Lane – John and Janet Holland
4. 2625 Caspia Lane – Timothy and Marian Howie
5. 2627 Caspia Lane – Robert and Edna Sizlo
6. 2628 Caspia Lane – Bruno and Victoria Pozzi
7. 2631 Freesia Drive – Fredrick and Jeanne Bradley
8. 2633 Freesia Drive – Sean and Frances McCarthy
9. 2635 Freesia Drive – Jim and Sherry Tilton
10. 2637 Freesia Drive – John and Kathryn Taylor
11. 2639 Freesia Drive – Paul Clay
12. 2641 Freesia Drive – Robert Garrison and Brenda Nancarrow - Garrison
13. 2643 Freesia Drive – Greg and Dara Bernstein
14. 2631 Marguerite Way – Bree Sommers

15. 2633 Marguerite Way - George and Susan Frampton
16. 2635 Marguerite Way – Jim and Sheri Copus
17. 2637 Marguerite Way – Johathan and Ivonne Savell
18. 3639 Marguerite Way – Carol Marsch
19. 2641 Marguerite Way – Cristopher and Kathleen Greco

**Totals: 18 homeowners approved placement of a Soundwall in front of their home.
1 homeowner disapproved placement of a Soundwall in front of their home.
1 homeowner did not respond.**

The Villas at Summerland

A development of 10 Homes – 10 enclosed Owner response with addresses noted below:

1. 2600 Caspia Lane – Jose and Veronica Carrillo
2. 2604 Caspia Lane – Katy Bacchilega – Smith
3. 2608 Caspia Lane – Danielle Tervo
4. 2612 Caspia Lane – Eran & Katy Olivas
5. 2613 Caspia Lane – Salvador Robles Briceno
6. 2615 Caspia Lane – Gwendolyn Hall
7. 2616 Caspia Lane – Shelly Sharp
8. 2617 Caspia Lane – Juliette Mackey
9. 2619 Caspia Lane – Doren Luken
10. 2620 Caspia Lane – Alan King


**Totals: 10 homeowners approve placement of a Soundwall in front of their home.
All homeowners responded.**

Sincerely,

**The Cottages at Summerland Owners' Association
The Villas at Summerland Owners' Association**

Kurt Skelton
Property Manager
Kennedy Accounting Systems

This message and any attachments are intended only for the use of the addressee and may contain information that is privileged and confidential. If the reader of the message is not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any dissemination of this communication is strictly prohibited. If you have received this communication in error, notify the sender immediately by return email and delete the message and any attachments from your system.



Comment Card

NAME: Owner: Donna Benaroya
 ADDRESS: 2621 Caspia Lane
 Summerland, CA 93067

REPRESENTING: OWNER


☐ Please add me to the project mailing list.
☒ Please email me updates on this project. E-mail Address: drbena@aol.com


I would like the following comments filed in the record* (please print):
I support and am completely in favor of Caltrans building a soundwall in front of our development, The Cottages at Summerland. I installed a water feature on my patio to try and mitigate some of the traffic noise that comes from Highway 101. It did not help at all. The noise is so loud and intrusive that I cannot talk/hear on the telephone when inside my home if a door or window is open — the traffic noise is THAT loud. Please build a soundwall in front of

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:
Donna Benaroya - Owner of 2621 Caspia Lane, Summerland, CA

CALTRANS DISTRICT 5
 Environmental Branch
 Attention: Matt Fowler
 50 Higuera Street
 San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☐ newsletter ☐ someone told me about it ☒ other: HOA





Comment Card

NAME: Owner: Joseph & Dianne Freeman
 ADDRESS: 2623 Caspia Lane
 Summerland, CA 93067

REPRESENTING: OWNER


☒ Please add me to the project mailing list.
☐ Please email me updates on this project. E-mail Address: _____

I would like the following comments filed in the record* (please print):
We support Caltrans building a soundwall on Highway 101 in front of the Summerland Cottages development. As Highway 101 is widened, the level of sound passing our residence will increase substantially. Therefore, without the soundwall, widening of the Highway would only benefit commuters at the expense of the residents.

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:
Joseph Freeman

CALTRANS DISTRICT 5
 Environmental Branch
 Attention: Matt Fowler
 50 Higuera Street
 San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☐ newsletter ☐ someone told me about it ☐ other: _____





Comment Card

NAME: _____ John & Janet Holland
 ADDRESS: _____ 516 South Capital Blvd.
 REPRESENTING: _____ Boise, ID 83702

☒ Please add me to the project mailing list.
☐ Please email me updates on this project. E-mail Address: JOHN.HOLLAND.CA@GMAIL.COM


I would like the following comments filed in the record* (please print):
I OWN A HOME AT 2624 CASPIA LANE IN SUMMERLAND
"THE COTTAGES"
 ① I SUPPORT CALTRANS BUILDING A SOUND WALL
 IN FRONT OF MY COMMUNITY DEVELOPMENT.
 ② I REQUEST A RE-EVALUATION OF FINDINGS BY
 CALTRANS REPORT DATED MARCH 2012 AND THE
 IMPACT ON MY HOME, COMMUNITY AND PARK.
 ③ I REQUEST ADDITIONAL IMPACT FROM CALTRANS
 BEFORE A DECISION IS MADE.

*Place your comments into the Comment Box tonight
or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
Environmental Branch
Attention: Matt Fowler
50 Higuera Street
San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☒ newspaper ☐ newsletter ☐ someone told me about it ☐ other: _____





Comment Card

NAME: _____ Owner: _____ Timothy & Marian Howie
 ADDRESS: _____ 2625 Caspia Lane
 REPRESENTING: Owner Summerland, CA 93067


☐ Please add me to the project mailing list.
☒ Please email me updates on this project. E-mail Address: timothyhowie@aol.com


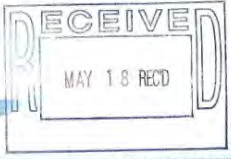
I would like the following comments filed in the record* (please print):
My house overlooks the ocean and Highway 101 and we use the trails
through Occasioner park regularly. This area is severely impacted by
traffic noise which will get worse with this project. I support the
Highway 101 widening, but our community needs a soundwall to protect
us from the resultant noise.

*Place your comments into the Comment Box tonight
or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
Environmental Branch
Attention: Matt Fowler
50 Higuera Street
San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☐ newsletter ☒ someone told me about it ☐ other: _____



Comment Card

NAME: Owner: Robert & Edna Sizlo
2627 Caspia Lane
Summerland, CA 93067

ADDRESS: _____

REPRESENTING: Owner

☒ Please add me to the project mailing list.

☒ Please email me updates on this project. E-mail Address: SIBER2@MSN.COM

I would like the following comments filed in the record* (please print):

I am a homeowner located within the Cottages at Summerland development. Our development fronts along US 101 which is scheduled to be widened. The noise coming from this highway is a constant roar and has become unbearable. We can see the US 101 traffic and there is no sound absorbing obstructions located between our home and the US 101 to buffer the constant car traffic noise – heard both day and night.







We also overlook the County Park which is located to the rear of our home and fronts along Via Real and US 101. The Park is used extensively by neighboring home owners who either walk their pets or stroll through the Park or sit on the benches provided. In addition, the jogging and horseback trail, located the full length of the Park, is utilized throughout the day. This trail is an integral part of the trails which surrounds the entire Cottages development.


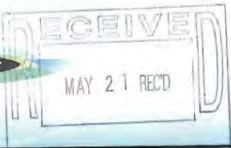
The widening of US 101 to three lanes will provide for increase levels of traffic and will only make worst an already unacceptable living existence. **"I approve the placement of a sound wall in front of our development".** *Robert Sizlo*

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
Environmental Branch
Attention: Matt Fowler
50 Higuera Street
San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☒ newsletter ☒ someone told me about it ☐ other: _____

Comment Card

NAME: Owner: Bruno & Victoria Pozzi
2628 Caspia Lane
Summerland, CA 93067

ADDRESS: _____

REPRESENTING: Owner

☐ Please add me to the project mailing list.

☐ Please email me updates on this project. E-mail Address: info@bpinnovations.net

I would like the following comments filed in the record* (please print):







Bruno and Victoria Pozzi support Caltrans building a soundwall in front of our development. We trust Caltrans to do the job comparable to what we have seen along the freeway south of our development.


Victoria Pozzi

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
Environmental Branch
Attention: Matt Fowler
50 Higuera Street
San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☒ newspaper ☐ newsletter ☒ someone told me about it ☒ other: Our Home Owner Association



Comment Card

NAME: Owner: Fredrick & Jeanne Bradley
 2631 Freesia Drive
 Summerland, CA 93067

ADDRESS: _____

REPRESENTING: Owner

☐ Please add me to the project mailing list.

☐ Please email me updates on this project. E-mail Address: _____


I would like the following comments filed in the record* (please print):


I SUPPORT THE CONSTRUCTION OF A SOUNDWALL
IN FRONT OF OUR DEVELOPMENT, THE COTTAGES AT
SUMMERLAND.

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
 Environmental Branch
 Attention: Matt Fowler
 50 Higuera Street
 San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☐ newsletter ☒ someone told me about it ☐ other: _____





Comment Card

NAME: Owner: Sean & Frances McCarthy
 2633 Freesia Drive
 Summerland, CA 93067

ADDRESS: _____

REPRESENTING: Owner

☒ Please add me to the project mailing list.

☒ Please email me updates on this project. E-mail Address: France4@mac.com


I would like the following comments filed in the record* (please print):


We Support building of a sound wall on
Hwy 101 to lessen the noise level on our
property. We would also like to see a
proposal showing the height, location and
material being used to construct the wall

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
 Environmental Branch
 Attention: Matt Fowler
 50 Higuera Street
 San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☒ newsletter ☒ someone told me about it ☒ other: Home owners
Association





Comment Card

NAME: Owner: Jim A. & Sherry Tilton
 ADDRESS: 2635 Freesia Drive
Summerland, CA 93067

REPRESENTING: Owner

☒ Please add me to the project mailing list.
☐ Please email me updates on this project. E-mail Address: _____

I would like the following comments filed in the record* (please print):


We support Caltrans building a soundwall in front of our development and want to see a specific proposal and engage in discussion on precise height, location, appearance, etc.


Sherry & Jim Tilton

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
 Environmental Branch
 Attention: Matt Fowler
 50 Higuera Street
 San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☐ newsletter ☒ someone told me about it ☐ other: _____





Comment Card

NAME: Owner: John & Kathryn Taylor
 ADDRESS: 2637 Freesia Drive
Summerland, CA 93067

REPRESENTING: Owner

☐ Please add me to the project mailing list.
☐ Please email me updates on this project. E-mail Address: _____


I would like the following comments filed in the record* (please print):


Please do further evaluation for GRANTING approval of a sound wall in front of the Summerland Cottages and Villas development

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
 Environmental Branch
 Attention: Matt Fowler
 50 Higuera Street
 San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☐ newsletter ☐ someone told me about it ☐ other: _____





Comment Card

NAME: Owner: PAUL CLAY
 ADDRESS: 2639 Freesia Drive
SUMMERLAND, CA 93067

REPRESENTING: Owner

☐ Please add me to the project mailing list.
☒ Please email me updates on this project. E-mail Address: Pabloclay@aol.com







I would like the following comments filed in the record* (please print):


I support building a sound wall in Summerland.

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
 Environmental Branch
 Attention: Matt Fowler
 50 Higuera Street
 San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☐ newsletter ☒ someone told me about it ☐ other: _____



Comment Card

NAME: Owner: Robert E Garrison
 ADDRESS: Brenda Nancarrow-Garrison
2641 Freesia Drive
Summerland, CA 93067

REPRESENTING: Owner

☐ Please add me to the project mailing list.
☒ Please email me updates on this project. E-mail Address: Brenda.nanc@ad.com
Robert E Garrison@gmail.com

I would like the following comments filed in the record* (please print):







I approve placement of a Sound wall in front of my home located at The Cottages at Summerland development.


Robert E Garrison 2641 Freesia Dr
Brenda Nancarrow-Garrison

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
 Environmental Branch
 Attention: Matt Fowler
 50 Higuera Street
 San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☐ newsletter ☒ someone told me about it ☐ other: _____



Comment Card

NAME: Owner: Gregg & Dara Bernstein
 ADDRESS: 2643 Freesia Drive
Summerland, CA 93067

REPRESENTING: Owner

☐ Please add me to the project mailing list.
☒ Please email me updates on this project. E-mail Address: greggab@me.com


I would like the following comments filed in the record* (please print):


The sound from the freeway is very loud in our community. When the freeway is widened, it will only get worse. It is really not fair to our community in the cottages at Summerland to have to hear and see this major highway that will be in our backyards. Please build a sound wall, as without one, our homelife and property values will surely suffer.

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
 Environmental Branch
 Attention: Matt Fowler
 50 Higuera Street
 San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☐ newsletter ☒ someone told me about it ☐ other: _____





Comment Card

NAME: Owner: Bree Sommers
 ADDRESS: 2631 Marguerite Way
Summerland, CA 93067

REPRESENTING: Owner

☒ Please add me to the project mailing list.
☐ Please email me updates on this project. E-mail Address: _____

I would like the following comments filed in the record* (please print):


I support Caltrans building a soundwall in front of the cottages at Summerland



Bree Sommers
Owner 101 16 / 2631 Marguerite
Way Summerland 93067
BREE SOMMERS

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
 Environmental Branch
 Attention: Matt Fowler
 50 Higuera Street
 San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☐ newsletter ☐ someone told me about it ☒ other: _____



Comment Card

NAME: _____ OWNER: George H. & Susan K. Frampton
 ADDRESS: 2633 Marguerite Way
Summerland, CA 93067

REPRESENTING: Owner







☐ Please add me to the project mailing list.
☒ Please email me updates on this project. E-mail Address: ghframpton@gmail.com


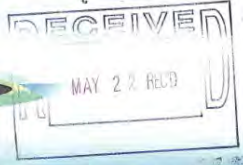
I would like the following comments filed in the record* (please print):
Please reconsider your decision regarding the
soundwall in front of Summerland Cottages. It
is badly needed with the increase of speed
that will certainly come with added HOV lanes.
If you can approve it will greatly help with
living close to the 101.
Thank you
George & Sue Frampton

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
 Environmental Branch
 Attention: Matt Fowler
 50 Higuera Street
 San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☐ newsletter ☒ someone told me about it ☐ other: _____

Comment Card

NAME: _____ OWNER: Jim & Sheri Copus
 ADDRESS: 2635 Marguerite Way
Summerland, CA 93067

REPRESENTING: Owner







☐ Please add me to the project mailing list.
☐ Please email me updates on this project. E-mail Address: _____


I would like the following comments filed in the record* (please print):
I do not support the development of a
sound wall that would run along the 101
and Via Real. I believe the aesthetic
drawbacks would not be outweighed by the
potential benefits of sound dampening
- J. S.

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
 Environmental Branch
 Attention: Matt Fowler
 50 Higuera Street
 San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☐ newsletter ☒ someone told me about it ☐ other: _____



Comment Card

NAME: Owner: Jonathan & Ivonne Savell
2637 Marguerite Way
 Summerland, CA 93067

ADDRESS: _____

REPRESENTING: Owner


☒ Please add me to the project mailing list.
☒ Please email me updates on this project. E-mail Address: jsavell@hotmail.com


I would like the following comments filed in the record* (please print):
The soundwall in front of the Cottages at Summerland
homes would serve as many homes as the wall in place
in areas of Carpinteria. If a freeway project increases noise
to current residents, you should mitigate that noise increase.

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
 Environmental Branch
 Attention: Matt Fowler
 50 Higuera Street
 San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☐ newsletter ☒ someone told me about it ☐ other: _____





Comment Card

NAME: Owner: Carol F. Marsch PO 1209
2639 Marguerite Way
 Summerland, CA 93067

ADDRESS: _____ Mailng Address

REPRESENTING: Owner Carol marsch


☒ Please add me to the project mailing list. PO 1209 Summerland Ca 93067
☐ Please email me updates on this project. E-mail Address: _____


I would like the following comments filed in the record* (please print):
I encourage + support a Sound Wall
I front of the Cottages at Summerland
this wall will greatly help diminish the 101 freeway
Noise. Especially as the Number of Cars increases
each year.
You have a wall built just a mile south for a
few houses + we 30 homes this would benefit.
4 a community park

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
 Environmental Branch
 Attention: Matt Fowler
 50 Higuera Street
 San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☒ newsletter ☒ someone told me about it ☐ other: _____





Comment Card

NAME: Owner: Christopher & Kathleen Greco
 ADDRESS: _____ 2641 Marguerite Way
 Summerland, CA 93067

REPRESENTING: Owner

☐ Please add me to the project mailing list.
☒ Please email me updates on this project. E-mail Address: KNAGATA@yahoo.com







I would like the following comments filed in the record* (please print):
We support Caltrans building a soundwall in front of
our development and want to see a specific proposal
and engage in discussion on precise height, location,
appearance, etc.


Kathleen Greco
Christopher Greco

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
 Environmental Branch
 Attention: Matt Fowler
 50 Higuera Street
 San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☒ newsletter ☒ someone told me about it ☐ other: _____



Comment Card

NAME: Owner: Jose & Veronica Carrillo
 ADDRESS: _____ 2600 Caspia Lane
 Summerland, CA 93067

REPRESENTING: Owner

☐ Please add me to the project mailing list.
☐ Please email me updates on this project. E-mail Address: _____

RECEIVED

JUN 26 2012

BY: _____

I would like the following comments filed in the record* (please print):







I own a home located within the Villas at Summerland development. Our development and home fronts along US 101 which is scheduled to be widened. The noise coming from US 101 is significant.


I approve the placement of a sound wall in front of our development.

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
 Environmental Branch
 Attention: Matt Fowler
 50 Higuera Street
 San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☐ newsletter ☒ someone told me about it ☐ other: _____



Comment Card

NAME: Owner: Katy Bacchilega-Smith
 ADDRESS: 2604 Caspia Lane
Summerland, CA 93067

REPRESENTING: Owner

☐ Please add me to the project mailing list.
☐ Please email me updates on this project. E-mail Address: _____

I would like the following comments filed in the record* (please print):

I approve placement of a sound wall in front
of my home.







RECEIVED
 JUN 26 2012
 BY: _____


Kate Smith

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
 Environmental Branch
 Attention: Matt Fowler
 50 Higuera Street
 San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☐ newsletter ☒ someone told me about it ☐ other: _____



Comment Card

NAME: Owner: Danielle Tervo
 ADDRESS: 2608 Caspia Lane
Summerland, CA 93067

REPRESENTING: Owner

☐ Please add me to the project mailing list.
☒ Please email me updates on this project. E-mail Address: lifernotion@aol.net

I would like the following comments filed in the record* (please print):

I approve placement of a Sound wall in front
of my home as long as it does not obstruct my
view.







RECEIVED
 JUN 26 2012
 BY: _____

Danielle Tervo

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
 Environmental Branch
 Attention: Matt Fowler
 50 Higuera Street
 San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☐ newsletter ☐ someone told me about it ☐ other: _____



Comment Card

NAME: Owner: Eran & Katy Olivas
 ADDRESS: 2612 Caspia Lane
Summerland, CA 93067

REPRESENTING: Owner

☐ Please add me to the project mailing list.
☒ Please email me updates on this project. E-mail Address: eranolivas@gmail.com

I would like the following comments filed in the record* (please print):
I like this idea! It's already noisy at night
with just two lanes!



I am a homeowner located within the Villas at Summerland development. Our development fronts along US 101 which is scheduled to be widened. The noise coming from US 101 is significant (unbearable). The widening of the road to three lanes, so as to provide for increased levels of high speed traffic, will only make worst an already unacceptable living existence. "I approve the placement of a sound wall in front of our development".


50 Higuera Street
San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☐ newsletter ☒ someone told me about it ☐ other: _____







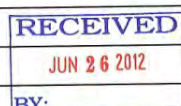
Comment Card

NAME: Owner: Salvador Robles Briceno
 ADDRESS: 2613 Caspia Lane
Summerland, CA 93067

REPRESENTING: Owner

☐ Please add me to the project mailing list.
☐ Please email me updates on this project. E-mail Address: _____

I would like the following comments filed in the record* (please print):
I approve of sound wall in front of my house, it gets noisier
and can hear all the time.










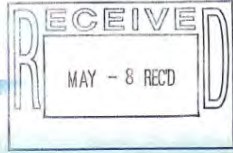
Salvador Briceno 6-24-12

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
 Environmental Branch
 Attention: Matt Fowler
 50 Higuera Street
 San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☐ newsletter ☒ someone told me about it ☐ other: _____

Comment Card

NAME: Owner: Gwendolyn M. Hall
 ADDRESS: 2615 Caspia Lane
Summerland, CA 93067

REPRESENTING: owner

☐ Please add me to the project mailing list.
☐ Please email me updates on this project. E-mail Address: _____

RECEIVED
 JUN 26 2012
 BY: _____







I would like the following comments filed in the record* (please print):


I am a homeowner located within the Villas at Summerland development. Our development fronts along US 101 which is scheduled to be widened. The noise coming from US 101 is significant. The widening of the road to three lanes, so as to provide for increased levels of high speed traffic, will only make worse an already unacceptable living existence. I approve the placement of a sound wall in front of our development.

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
 Environmental Branch
 Attention: Matt Fowler
 50 Higuera Street
 San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☐ newsletter ☒ someone told me about it ☐ other: _____



Comment Card

NAME: Owner: Shelly Sharp
 ADDRESS: 2616 Caspia Lane
Summerland, CA 93067

REPRESENTING: Owner

☐ Please add me to the project mailing list.
☒ Please email me updates on this project. E-mail Address: ssanthree2002@gmail.com

I would like the following comments filed in the record* (please print):

I do approve of the sound wall in front of our development to keep the noise down.
Shelly Sharp







RECEIVED
 JUN 26 2012
 BY: _____


RECEIVED
 MAY - 7 RECD

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
 Environmental Branch
 Attention: Matt Fowler
 50 Higuera Street
 San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☐ newsletter ☐ someone told me about it ☒ other: _____



Comment Card

NAME: Owner: Juliette P. Mackey
 ADDRESS: 2617 Caspia Lane
 Summerland, CA 93067

REPRESENTING: Owner

☐ Please add me to the project mailing list.
☐ Please email me updates on this project. E-mail Address: _____

RECEIVED
 JUN 26 2012
 BY: _____

I would like the following comments filed in the record* (please print):







RECEIVED
 JUN 2 2012
 BY: _____

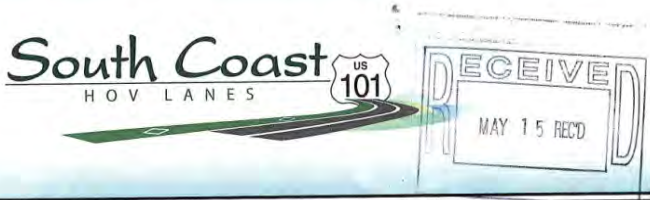
Owner's Comment Card noting approval for placement of a sound wall in front of Owner's home located at The Villas at Summerland sent directly to CALTRANS via return mailer.

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
 Environmental Branch
 Attention: Matt Fowler
 50 Higuera Street
 San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☐ newsletter ☐ someone told me about it ☐ other: _____



Comment Card

NAME: Owner: Dorene Luken
 ADDRESS: 2619 Caspia Lane
 Summerland, CA 93067

REPRESENTING: Owner

☒ Please add me to the project mailing list.
☐ Please email me updates on this project. E-mail Address: _____

RECEIVED
 JUN 26 2012
 BY: _____


I would like the following comments filed in the record* (please print):

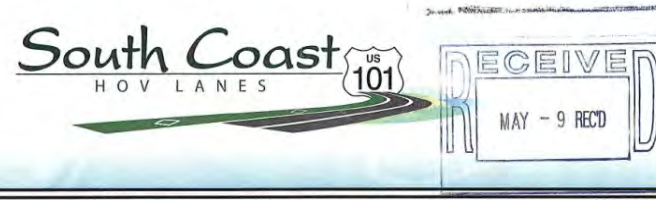
I am a homeowner located within the Villas at Summerland development. The noise level of the US 101 is very loud. When the US 101 is widened to 30 lanes it will definitely be unbearable. I approve the placement of a sound wall in front of our development.

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
 Environmental Branch
 Attention: Matt Fowler
 50 Higuera Street
 San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☒ newsletter ☐ someone told me about it ☐ other: _____





Comment Card

NAME: Owner: Alan Conway King
 ADDRESS: 2620 Caspia Lane
 Summerland, CA 93067

REPRESENTING: Owner

☐ Please add me to the project mailing list.
☒ Please email me updates on this project. E-mail Address: RINCONAK@COX.NET

RECEIVED
 JUN 26 2012
 BY: _____

I would like the following comments filed in the record* (please print):


I APPROVE THE BUILDING OF A SOUND WALL IN FRONT OF OUR DEVELOPMENT. I AM THE HOME OWNER AT THE ADDRESS ABOVE AND THE NOISE FROM THE FREEWAY IS AT HIGH LEVELS FROM MY HOME. THE WIDENING OF US 101 WILL ONLY MAKE THIS WORSE FROM THE HIGH SPEED TRAFFIC. PLEASE ASSIST IN PLACING THIS SOUND WALL, THANKS

ALAN KING

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
 Environmental Branch
 Attention: Matt Fowler
 50 Higuera Street
 San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☒ newsletter ☐ someone told me about it ☒ other: _____



The above comments were attached to the Villas at Summerland Association letter submitted by Kurt Skelton.

The Villas at Summerland Association (Kurt Skelton)

General Response

Additional modeling scenarios were completed using the ground patios, the upper-floor patios, with and without the suspect calibration adjustment with no homes at the second row (or the new upper-development ground levels) level receiving 5 dBA of benefit from a soundwall, which is a requirement for those homes to be counted as benefitted with the installation of a soundwall. The nine home sites and the two homes that are in building permit process were included in the noise modeling and were found to not be benefitted by a wall. The public park that fronts the Summerland Cottages development was reevaluated and found to be a length that qualifies for seven additional frontage units that would be benefitted by a soundwall.

Even with the additional frontage units included to represent the park, Soundwall S374 continues to be financially unreasonable and is not recommended for construction. In addition, it was also determined that a soundwall in this location would block prime ocean views. As a result this wall would not be recommended for construction due to severe visual impacts.

Since Soundwall S374 is financially unreasonable and cannot be recommended for construction, there are several locations where severe noise receptors are present without a proposed soundwall (Receptor R49.2). This situation has occurred due to prime ocean views being blocked by a soundwall or floodways being blocked by a soundwall. In these cases, providing acoustical treatment on private property or soundwalls on county property, if appropriate, will be considered in coordination with the property owner. Acoustical treatment on private property might include insulation, dual paned windows, air conditioning or private walls.

Please refer to Observer Viewpoint 7 in Section 2.1.6, Volume I, for discussion of prime ocean views in Summerland and Section 2.1.7 for more details on Soundwall S374.

June 24, 2012

Matt Fowler, Senior Environmental Planner
Caltrans District 5
50 Higuera Street
San Luis Obispo, CA 93401

RE: South Coast 101 HOV Lanes Project-Cabrillo Interchange

Dear Mr. Fowler,

As business owners in the Las Aves complex, 1801-1809 E. Cabrillo Boulevard (on the corner of Los Patos Way and E. Cabrillo Boulevard), we the undersigned are writing to express our concerns about any proposal for the Cabrillo Interchange that would use Los Patos Way as the primary southbound on-ramp or off-ramp for highway 101. The resulting increase in traffic on Los Patos Way would be disastrous for our businesses as the increased congestion would make it both unpleasant and difficult for customers and patients to either enter or leave our parking area. In addition, the increased traffic would significantly detract from the enjoyment of outdoor dining at the restaurants on Los Patos Way.

We strongly urge you to reject the Caltrans proposed Configurations J, M and M-Modified that would use Los Patos Way as the southbound off-ramp and add a new southbound on-ramp at Los Patos Way. Also, we ask you to reject any suggestions by the Montecito Association that would use Los Patos Way as the primary southbound on- or off-ramp.

Caltrans Configuration F-Modified is the best choice as it would place the on- and off-ramps immediately adjacent and to the right of the southbound lanes. It also would direct northbound 101 beach area traffic to a new right side exit thus avoiding the additional congestion on Coast Village Road that would result from using Hermosillo as the primary northbound exit as proposed under Configuration F.

Thank you for considering these comments.

Respectfully submitted,

Linda Sanders Robertson
Linda Sanders One On One Fitness
1809 E. Cabrillo Blvd., Ste. B

David A. Cowan, DMD
1805 E. Cabrillo Blvd., Ste. E

June 24, 2012
Page 2

Kristin Turner and Martha Solodkin
La Playa Pilates
1809 E. Cabrillo Blvd., Ste. A

Melanie and Megan Simon
Beautiful You
1805 E. Cabrillo Blvd., Ste. B

James Adams, DC and Maria Adams, DC
Adams Chiropractic
1809 E. Cabrillo Blvd., Ste. B

Mara Sweeney, MD and Eric Trautwein, MD
1805 E. Cabrillo Blvd., Ste. C

Erik Smith, Stacy Smith, Johanna Anderson, Minka Robinson Stevens
Points of Health
1805 E. Cabrillo Blvd., Ste. E

Las Aves Business Complex

Supports F Modified

Based on public response received during review of the draft environmental document and other factors, Caltrans and the Project Development Team have selected the F Modified configuration for the Cabrillo Boulevard/Hot Springs Road Interchange. This selection means that Los Patos Way off-ramp will be closed as part of the project. New southbound on- and off-ramp connections will also be provided within the State right-of-way to the right of the U.S. 101 mainlines.



July 5, 2012

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Fax: (805) 969-4043

info@montecitoassociation.org
www.montecitoassociation.org

Matt Fowler, Senior Environmental Planner
Caltrans District 5
50 Higuera Street
San Luis Obispo, CA 93401

Re: Draft Environmental Document for the Highway 101 HOV Project

Dear Mr. Fowler:

Thank you for this opportunity to comment on the Draft Environmental Document for the Highway 101 HOV Project from Carpinteria to Santa Barbara. By way of background, the Montecito Association has been actively engaged in the review of this project during the last several years. We have met numerous times with Caltrans and Santa Barbara County Association of Governments personnel to discuss project alternatives and community concerns. Our goals have been to ensure that the project is constructed in a manner that preserves community character and aesthetics and minimizes disruption to the community. Our review of the project and document have focused primarily on the segment from Santa Barbara to Summerland, however many of these comments are relevant to the project as a whole.

The Draft Environmental Document ("document") fails to comply with the requirements of the California Environmental Quality Act (CEQA) in at least the following areas:

1. Failure to analyze and consider a reasonable range of alternatives;
2. Failure to identify environmentally superior alternatives;
3. Failure to address the feasibility of alternatives;
4. Failure to adequately address traffic, visual aesthetics, noise and the impact of construction; and
5. Failure to adequately address consistency with local policies.

Each of these areas is addressed below. We respectfully request that these deficiencies be corrected and that the revised document be circulated for public comment.

ALTERNATIVES

Under the California Environmental Quality Act (CEQA), an Environmental Impact Report (EIR) must describe and analyze a "range of reasonable alternatives" that would meet most of the basic objectives of a proposed project, while avoiding or substantially lessening any of the significant effects of the project. CEQA Guidelines § 15126.6. An EIR must evaluate the comparative merits of each alternative. *Id.* An EIR must identify the "environmentally superior alternative," and if the "No Project" alternative is environmentally superior, then the EIR must also identify an environmentally superior alternative among the other alternatives. CEQA Guidelines § 15126.6(c)(2).

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Reasonable Range of Alternatives

This EIR analyzes an impermissibly narrow range of alternatives. Specifically, unnecessary project parameters preclude alternatives capable of mitigating significant impacts if they would require the purchase of additional road right-of-way. Project impacts to visual resources as a result of the removal of significant skyline trees from the existing highway median would be significant. For example, right-of-way acquisition and widening to the outside of the highway west of Sheffield Drive would allow for retention of significant trees near San Ysidro Creek. The document fails to evaluate alternatives to the project that would accommodate retention of these trees through the Montecito area contrary to CEQA Guidelines §15126.6.

Similarly, the document fails to evaluate an alternative at Cabrillo/Hot Springs that directly connects a new northbound off-ramp to an enlarged Hot Springs roundabout. A draft schematic of this alternative is included as Figure 1 of Exhibit A. Such an alternative would require limited right-of-way acquisition on the north side of the roundabout but would reduce potentially significant concerns (described below) regarding safety and congestion associated with Alternatives F-modified and M.

Environmentally Superior Alternative

This EIR fails to identify an environmentally superior alternative, as required by the CEQA Guidelines. In the absence of clear conclusions as to which alternatives are environmentally preferable, the document does not provide the full information necessary for informed decision-making as intended under CEQA.

Feasibility of Alternatives

CEQA forbids a public agency from approving a project as proposed if there are feasible alternatives that would substantially lessen the significant environmental effects of the project. The EIR and the public have identified several feasible alternatives that would substantially lessen the significant environmental effects of the proposed project; so far, however, these alternatives have been erroneously characterized as infeasible. In fact, these alternatives are legally and practically feasible.

The document identifies substantial unavoidable impacts to visual resources/aesthetics under the design alternatives evaluated. Additionally, reconstruction of the Cabrillo/Hot Springs interchange will result in significant construction impacts over the three-year duration of construction. The document excludes Cabrillo/Hot Springs Alternative J-modified (Figure 2, Exhibit A) from further review on the basis that retention of left-side ramps is contrary to AASHTO geometric guidance and "are to be avoided in interchange design" despite the fact that J-modified would substantially reduce significant impacts to the visual character of the area; would materially reduce the duration of construction; would substantially reduce impacts to circulation during construction; and would address policy inconsistencies related to protection of the visual character of the area. As this alternative is capable of avoiding or substantially lessening significant effects of the project, further evaluation is warranted pursuant to CEQA Guidelines §15126.6.

Similarly, given the significant visual impacts that would result from the loss of the parkway character of the freeway and significant skyline trees with the proposed Sheffield interchange reconstruction, consideration of an alternative that either maintains the left side ramps, provides an acceleration lane and starts the high occupancy vehicle lane further east, or an alternative that eliminates the southbound ramps warrant consideration. Both would allow the southbound

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portion of the freeway to remain at grade thereby reducing view impacts, construction noise, duration and air quality impacts.

Additional Alternatives Should Be Analyzed

The following proposed alternatives are feasible and would lessen the significant impacts of the proposed project:

- Cabrillo/Hot Springs Alternative J Modified.
- Cabrillo/Hot Springs northbound off ramp connection to an enlarged roundabout.
- Right-of-way acquisition and consideration of design exceptions for lane and shoulder width along the Highway 101 corridor to preserve significant existing landscaping and skyline trees.
- Sheffield interchange alternatives that retain existing southbound highway grade by preserving existing left-side southbound ramps or eliminating one or both southbound ramps.

8

Please refer to Exhibit A which provides more detailed information on suggested alternatives to the proposed project.

AFFECTED ENVIRONMENT

An EIR must include a detailed statement setting forth all the significant effects of the proposed project on the environment. All phases of a project must be considered when evaluating its impact on the environment.

9

An EIR must demonstrate that the significant environmental impacts of a proposed project were adequately investigated and discussed, and the environmental setting must be described in sufficient detail to inform readers of the nature of the resources affected by a proposed project. An adequate description of the environmental setting is necessary to permit the lead agency to accurately assess the effects of the project on the environment.

An accurate assessment of impacts is also hampered by an incomplete description of the measures required to reconstruct the Cabrillo/Hot Springs and Sheffield Drive interchanges. The project description should be revised to describe the construction sequencing and estimated timing for each phase of construction; the location and size of the construction staging and support areas for each phase; the duration of ramp closures and traffic re-routing and the amount of earthwork necessary to accomplish the reconstructions.

Traffic and Transportation

The traffic and transportation section of the document fails to provide adequate information to meet the primary purpose of CEQA: informed decision making. The traffic section of the document lacks information on existing traffic operations and volumes at affected intersections and roadways. Relegating this information to the technical appendices does a disservice to the public. The information must be presented in a manner that may be understood by interested members of the public and decision-makers. In the absence of clear presentation of this information, impacts cannot be accurately determined and the relative merits and drawbacks of the alternatives cannot be fully understood.

10

The document must be revised to include current traffic data for affected intersections through the entire project area. This information must reflect the current conditions since completion of the Milpas to Hot Springs project and include data for the Olive Mill, San Ysidro and Sheffield

11

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Page 4

interchanges. During construction of the Milpas to Hot Springs project, there was significant diversion of traffic onto local streets. Now that the project is completed, traffic patterns have changed.

The document should also include an evaluation of the operational effectiveness of the project alternatives. For Hot Springs/Cabrillo Alternatives F modified, M and M modified, please provide some discussion of how the roundabout would function with the addition of a traffic signal at the northbound ramps and another at the southbound ramps or Los Patos/Cabrillo. Similarly, how would the roundabout and Olive Mill/Coast Village Road intersections function if Hermosillo was the only northbound off ramp? What kind of additional traffic volumes would be added to Coast Village Road?

12

From the information presented, it is unclear which conditions would cause signal warrants to be met at Hermosillo/Coast Village Road and, if warrants were met, whether a signal would be installed. Please clarify.

We also suggest that the document include collision statistics for a 10-year period (April 2000 to March 2010) to provide a more complete picture of the hazards, or lack thereof, of the left-side ramps and to include data since the installation of a controllable traffic signal in 2009. As shown in Exhibit B, the 10-year data shows accident rates at the left-side ramps that are similar or less than the average expected rates for similar ramps. We find it worth noting that of the ramps evaluated, the accident rates at the standard, right-side ramps at Hermosillo and Los Patos are three to ten times the state average for similar ramps while accident rates for the local left-side ramps are only zero to 40% above the state average. The argument that the left-side ramps are being replaced for "safety reasons" does not hold up under scrutiny.

13

The document identifies the need for improvement of the Cabrillo/Los Patos intersection with certain project alternatives but fails to identify the necessary improvements. Similarly, the document does not address the constraint presented by the Cabrillo Boulevard railroad bridge on pedestrian and bicycle traffic. Olive Mill interchanges are also projected to operate at unacceptable levels of service and appropriate intersection improvements to address these conditions should be identified.

14

The document should disclose that the existing San Ysidro southbound onramp is extremely dangerous due to the minimal distance provided for vehicles to accelerate. Additional traffic from the approved Miramar Hotel project will add further traffic at this location further exacerbating traffic safety. The proposed project is deficient in failing to consider measures to correct this condition and upgrade the San Ysidro Road overpass. The close proximity of the southbound Olive Mill onramp and the southbound San Ysidro Road offramp currently provide little room for merging traffic, resulting in unsafe conditions. Please document this existing safety condition and propose mitigation measures. We believe that one possible mitigation measure would be the provision of an auxiliary lane in this location, which Caltrans' own studies indicate would improve 2020 level of service from LOS E to LOS C.

15

An evaluation of the safety impacts of the sound walls on eastbound bicyclists using the N. Jameson bicycle lane must also be provided in the document.

16

Visual Resources/Aesthetics

The segment of Highway 101 through Montecito was the first parkway in California. Maintenance of the visual character of the highway is of great interest to community members and to the County of Santa Barbara as documented in the Highway 101 Corridor Design Guidelines adopted by the Board of Supervisors in 1999. As proposed, the project will construct

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Page 5

two very urban interchanges at either end of the Montecito community. These will be connected by six travel lanes and ample road shoulders with no median planting. We agree that this would result in a substantial negative change to the visual character of the highway corridor.

Accurately disclosing Visual Resources impacts is key to the development of a project that mitigates such impacts to the maximum extent feasible. To that end, the analysis should be expanded to provide reasonable worst case analysis of impacts and to include clear conclusions with respect to visual impacts under CEQA. For example, the loss of skyline trees and landscaping from the highway median would significantly change the visual character of the highway through Montecito and the Padaro area. The document fails to identify potentially feasible project alternatives and/or mitigation measures (such as the purchase of additional right-of-way) to reduce the impact. The document also lacks sufficient detail to facilitate comparison of the visual impacts of the alternatives at Cabrillo/Hot Springs.

The document discussion in Chapter 2.1.6 identifies a substantial visual change as a result of project-level impacts and concludes that, despite proposed mitigation measures, impacts would remain substantial. The Chapter 3 evaluation of CEQA fails to address the project-level impact on visual resources/aesthetic but finds the cumulative impact unavoidable and significant. Please add a discussion of project-level CEQA impacts. We believe these impacts to be significant and unmitigated by the measures and alternatives proposed by Caltrans.

The document does not include visual simulations in the areas where the greatest amount of pavement and thus the least amount of landscaping would be provided. Please amend the environmental document to include these additional views: The eight (8) lane segment of the highway over Ortega Hill between Sheffield Drive and Evans Road; the 118 foot wide Sheffield interchange bridge; and the area east of Cabrillo/Hot Springs where four southbound lanes are proposed. Similarly, there is little ground level documentation of the appearance of proposed interchange structures, including retaining walls from adjacent streets and other public viewing areas. Given that approximately 3,500 linear feet of retaining walls are proposed with some of the Cabrillo/Hot Springs interchange alternatives, this information is crucial to evaluating the relative impacts of the different alternatives.

We believe that the loss of the parkway character of the highway in the Sheffield/Ortega Hill area would result in a significant impact and would be inconsistent with the County's adopted guidelines for the 101 corridor. Further evaluation of project alternatives in this location (as described on page 1 of this letter) is warranted.

A more detailed and complete evaluation of the project's visual resource and aesthetic impacts will lead to more thorough development of mitigation measures. Among the measures that warrant further consideration and development are: Limited right-of-way acquisition to allow for median plantings and additional shoulder landscaping in Montecito; selection of project alternatives for Cabrillo/Hot Springs and Sheffield interchange construction that maximize the retention of unpaved areas for landscaping; measures to replace lost skyline trees; reduced shoulder and/or lane widths to provide space for landscaping; and starting the HOV lane further east.

Noise

The conclusions included in the document regarding the change in ambient noise levels resulting from the proposed project are contrary to the information presented by Caltrans to the public as recently as April 2012. The document identifies an increase of up to 3 dBA from project-year (2020) projected noise levels. Sound walls are then proposed in locations deemed reasonable

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and feasible to reduce noise by at least 5 dBA. At the April 25 public meeting on the document, Caltrans staff stated that they are proposing to install noise reducing pavement material as part of the project and that this will provide an additional 5 dBA noise reduction. If this is a feasible mitigation measure, it should be included in the impact assessment and be part of the determination regarding sound walls. If it is infeasible, then an explanation should be included.

The determination of CEQA noise impacts uses a threshold of a 12 dBA increase in noise levels to determine significance. No basis for this threshold is provided. Is it a Caltrans adopted threshold? The document must include a discussion of the County of Santa Barbara's noise threshold which states: "A project will generally have a significant effect on the environment if it will increase substantially the ambient noise levels for noise-sensitive receptors in adjoining areas. Per item a., this may generally be presumed when ambient noise levels affecting sensitive receptors are increased to 65 dB(A) CNEL or more."

We believe that under CEQA, the project would result in a significant change in noise exposure at sensitive receptors and that installation of sound walls is necessary in certain locations to reduce impacts to a less than significant level. Where noise levels would exceed 65 dBA, we believe that impacts would remain significant if walls are not installed because of Caltrans' determination that they are not cost effective or are infeasible for other reasons.

The cost allowance protocol used to determine whether a wall is economically justified lacks transparency and thus denies the affected public the ability to comment meaningfully on the decisions made by Caltrans. This should be corrected prior to any final determinations regarding sound wall installation.

Construction Impacts

This portion of the document fails to provide a level of detail adequate to allow for a comparison of the impacts of the different project alternatives. The document should include a discussion of the duration of construction anticipated for the different interchange alternatives and the estimated amount of earthwork required for each. We understand from the Project Study Report that some alternatives at Cabrillo/Hot Springs would require as much as 250,000 cubic yards of grading. Providing this information in the document would allow for meaningful analysis of the differing noise, air quality and temporary circulation impacts associated with construction.

The discussion of vibration and potential effects on historic structures appears to conflict with the determination in the Cultural Resources section of no impacts to historic structures as a result of the project. As discussed in this portion of the document, fragile historic structures within 179 feet of the source of vibrations can be damaged. Clear information on the distance between historic structures and vibrations sources must be documented and appropriate mitigation put in place where necessary.

CONSISTENCY WITH LOCAL POLICIES

An EIR must "discuss any inconsistencies between the proposed project and applicable general plans and regional plans." CEQA Guidelines § 15125(d); *Sierra Club, supra*, 163 Cal. App. 4th at pp. 543-44; *Chaparral Greens v. City of Chula Vista* (1996) 50 Cal. App. 4th 1134, 1144. The document provides very little discussion of the consistency of the project with County of Santa Barbara's adopted Highway 101 Corridor Design Guidelines. As the project as proposed would appear to be inconsistent with many of the provisions of these guidelines, further discussion is warranted. Specific standards requiring attention include:

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Page 7

- Objective 4 – Maintain and preserve existing highway structures and mature landscaping unless determined to be infeasible;
We do not believe it is infeasible to retain some existing highway structures.
- Objective 7 - Maintain the historic aspects of the original Montecito Parkway based on the *Tilton Plan*, date 1930;
This project does not retain the historic aspects of the Montecito Parkway.
- Objective 8 - Preserve the character of the highway corridor in Montecito, identified by lush, dense vegetation and an extensive tree canopy;
Six solid traffic lanes and 10' shoulders undivided by landscaping would not meet the intent of this objective.
- Guideline G1 – All grading shall be conducted in such a manner as to maintain the existing profile of the Highway 101 Corridor, soften the appearance of the highway and its massive structures, preserve existing landscaping and provide new landscaping;
Sheffield interchange grading will substantially change the profile of the highway at this scenic location, result in the significant loss of landscaping and add significant paved hardscape with eight traffic lanes.
- Guideline G2 – Grading should be planned such that the completed project will maintain or improve the aesthetics of each highway segment; and
Grading at interchanges will result in retaining walls and degraded views.
- Guideline S6 – Medians shall be designed to accommodate substantial median plantings; and the many landscape guidelines.
No median plantings are planned through Montecito.

Additionally, the document appears to confuse the City of Santa Barbara's Coastal Parkway Guidelines with the County's Highway 101 Corridor Design Guidelines on pages 48 and 49.

ADDITIONAL CONSIDERATIONS

These comments are not necessarily related to the adequacy of the environmental document but are material to Caltrans' consideration the components of the ultimate project.

1. Consider the use of a southbound onramp at Los Patos that retains the existing railroad bridge by utilizing a sacrificial beam to protect the bridge from over-tall vehicles.
2. The policy decision not to acquire right-of-way for the project but to strictly apply minimum lane and shoulder width requirements in all cases except where expedient for Caltrans is not acceptable. Caltrans should consider pursuing design exceptions to lane and shoulder widths to address local concerns and provide consistency with adopted local plans. Such exceptions have been provided in other recent projects.
3. We do not support an option that would rely solely on Hermosillo Road as the primary northbound exit in the Cabrillo/Hot Springs area. This would result in the addition of unacceptable levels of traffic on Coast Village Road and would likely adversely affect the residential neighborhood to the north.

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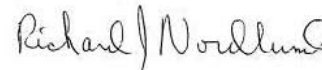
July 5, 2012
Page 8

CONCLUSION

CEQA requires that a lead agency must recirculate an EIR when significant new information is added to the EIR or becomes apparent, prior to certification of the EIR. "Significant new information" is defined as including: (1) a disclosure of a new significant environmental impact; or (2) a disclosure showing a substantial increase in the severity of an environmental impact; or (3) when a project alternative or mitigation measure becomes feasible and would clearly lessen the environmental impacts of the project (and when the new feasible alternative or mitigation measure is not adopted). An EIR must also be recirculated when it is so fundamentally inadequate and conclusory in nature that meaningful public review and comment are precluded.

The proposed project would result in substantial changes in the character of the highway and the surrounding community. In order for the environmental document to provide an accurate and adequate evaluation of the environmental effects of the project and serve to fully inform decision-makers, additions and revisions as described above are necessary. We respectfully request that Caltrans recirculate a revised environmental document for further public review.

Sincerely,



Richard J. Nordlund, President

cc: Mayor Schneider, City of Santa Barbara
Montecito Planning Commission
County Planning Commission
Supervisor Carbajal
Jim Kemp, SBCAG, 260 North San Antonio Road, Suite B, Santa Barbara CA 93110
Rachel Falsetti, Caltrans District 5, 50 Higuera Street, San Luis Obispo, CA 93401
Bimla Rhinehart, Executive Director, California Transportation Commission, 1120 N Street, Rm 2221 (MS-52), Sacramento, CA 95814
Malcolm Dougherty, Director, Caltrans, P.O. Box 942873, Sacramento, CA 94273-0001
Joshua Grobin, Office of the Governor, State Capitol, Suite 1173, Sacramento, CA 95814

Exhibits

- A. Recommended Alternative Designs
 - Figure 1. Expanded Cabrillo/Hot Springs Roundabout Conceptual Design
 - Figure 2. Cabrillo/Hot Springs Alternative J-Modified
 - Figure 3. San Ysidro Interchange Conceptual Design
- B. Ten-Year Accident Data for Left Hand Ramps

EXHIBIT A

Alternatives for 101 HOV Project

Cabrillo/Hot Springs Interchange:

1. Alternative J Modified – This alternative is as described in the environmental document. Left-side off ramps and the Hermosillo off ramp would be maintained; a southbound on ramp would be added at Los Patos Way. See Figure 1. This alternative would retain the existing freeway overpasses in the current locations, minimize the amount of grading and thus maintain the existing aesthetics, reduce construction disruption, reduce construction duration and environmental impacts and dramatically reduce costs.
2. Northbound off ramp directly into expanded roundabout – See Figure 2. The Cabrillo/Hot Springs roundabout would be expanded to carry two lanes of traffic, requiring some right-of-way acquisition to the north. This alternative addresses the northbound off ramp only and does not address the southbound configuration.
3. If Los Patos Way is used to provide a southbound onramp, retention of the railroad bridge in place and the use of a sacrificial beam to avoid bridge damage should be evaluated. This would substantially reduce costs associated with railroad bridge replacement.
4. Use of Los Patos Way as an on ramp only, retain existing left-side southbound exit at Cabrillo.

Olive Mill Road Interchange:

Provide auxiliary lane from Olive Mill southbound on ramp to San Ysidro southbound exit.

San Ysidro Road Interchange:

Improve overpass and improve southbound on ramp. One concept includes a new southbound on ramp and a roundabout at each end of the overpass as shown in Figure 3. This dumbbell arrangement would compensate for the inadequate overpass width, which has no provision for a left-turn lane.

Sheffield Interchange:

Several options are available that would maintain the existing aesthetics, have an equal or better accident record, reduce construction disruption, reduce construction duration and environmental impacts and dramatically reduce costs. These solutions would require relocating the end of the HOV lanes to the east. The alternatives warrant evaluation and presentation to the community.

1. Maintain the existing left-hand on and off ramps that have almost a flawless safety record. This solution would require adding a lane in each direction and widening only one overpass. If a southbound acceleration lane is required it could be at the extension of the on ramp.
2. Maintain the existing southbound off ramp and divert all southbound traffic to the Evans interchange. In addition to the savings noted above, it would remove the necessity of an acceleration lane.

Length of Freeway:

1. Acquire right-of-way to maintain skyline trees and landscape buffers.
2. Consider design exceptions to lane and shoulder widths to allow retention/replacement of landscaping.

Figures:

1. Cabrillo/Hot Springs Alternative J-modified
2. Enlarged Cabrillo/Hot Springs Roundabout Conceptual Design
3. San Ysidro Interchange Conceptual Design

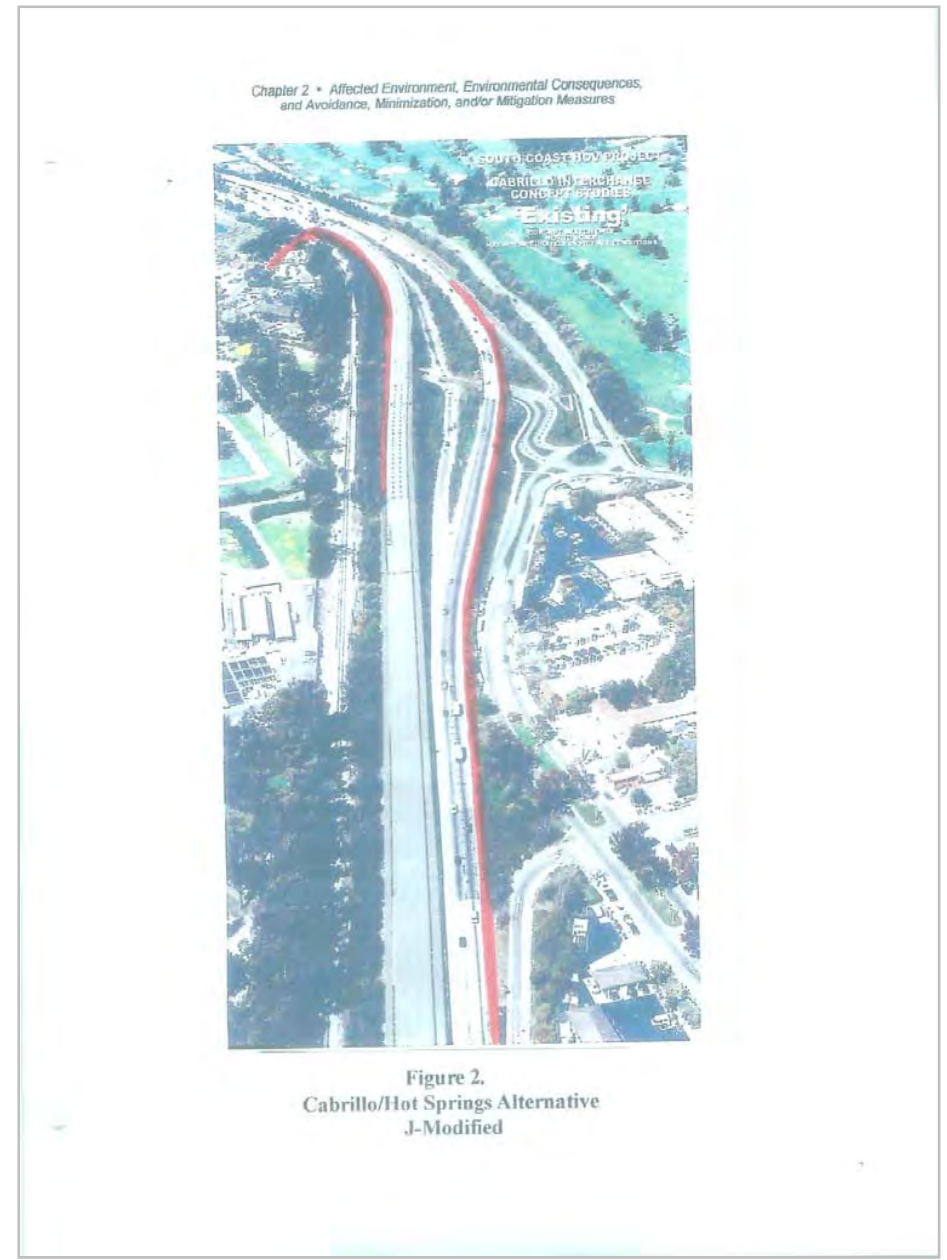
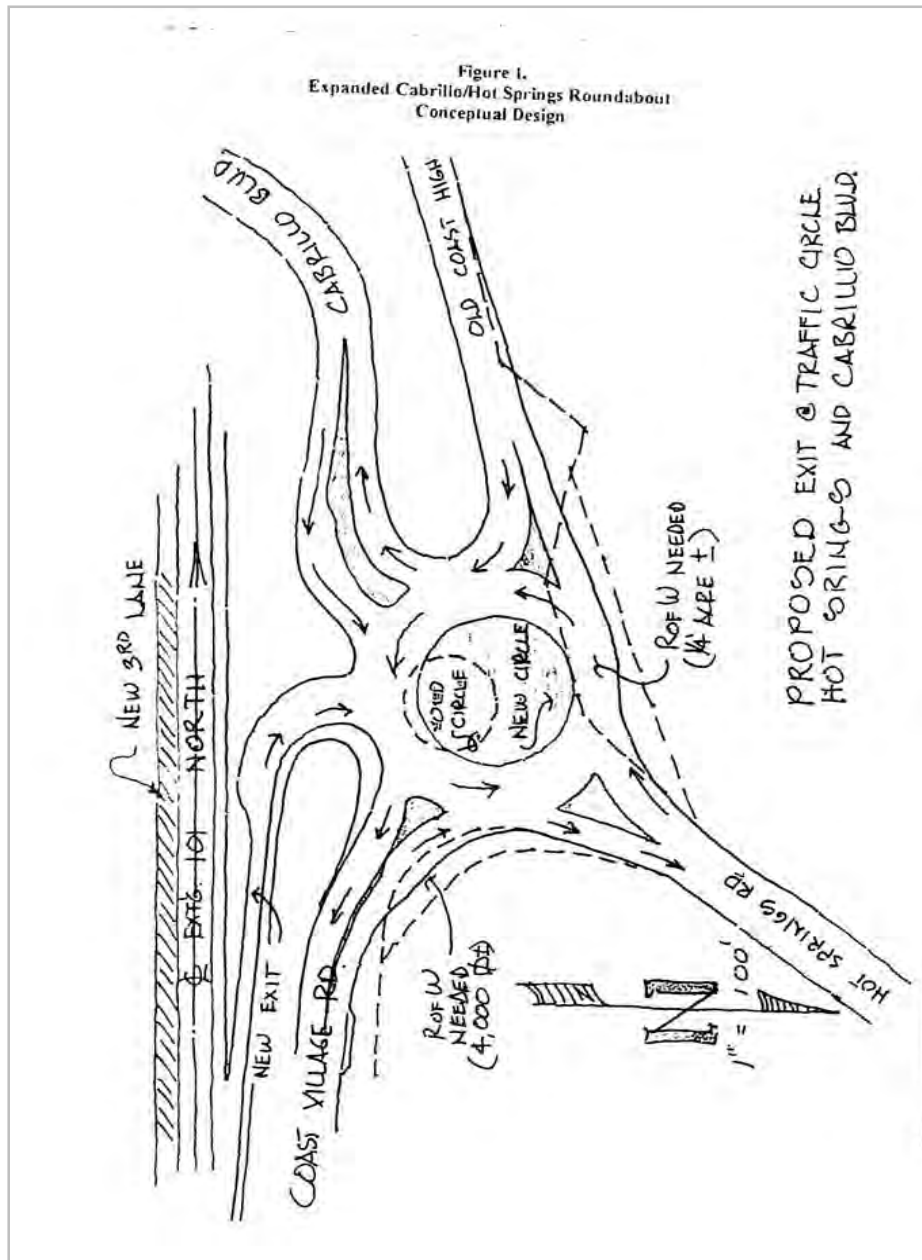


Figure 3.
San Ysidro Interchange
Conceptual Design

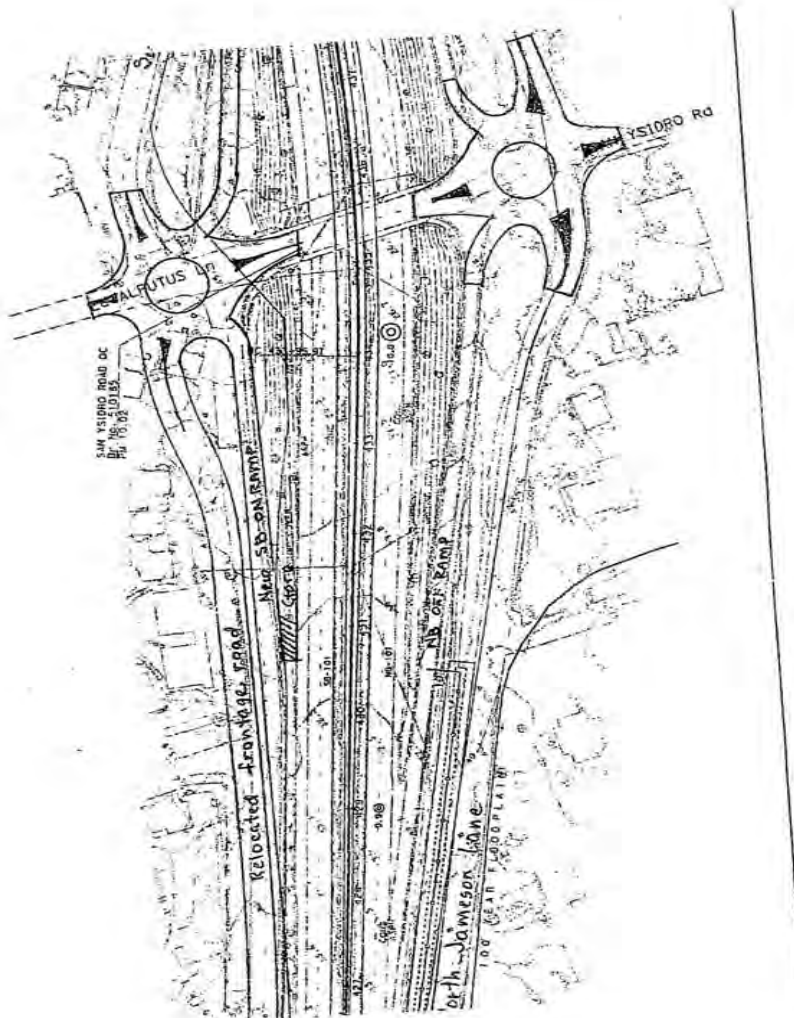


Exhibit B
Ten-Year Accident Data

Collision Rates - The collision rates for the ten-year period from April 1, 2000 through March 31, 2010 for all existing on ramps and off ramps near the Cabrillo Blvd. interchange are compared to the statewide averages for similar facilities in Table 3.

Table 3: Route 101 and Ramp Collision Data Summary near Cabrillo Blvd. (Table B)

Location (Limits: PM 2.0-12.3)	No. of Collisions			Actual Rates (ACCS/MVM)			Average Rates (ACCS/MVM)		
	FAT	F-I	TOT	FAT	F-I	TOT	FAT	F-I	TOT
NB Hemisillo Off Ramp*	0	2	11	0	0.54	2.99	0.004	0.28	0.95
NB Cabrillo Lt. Off Ramp	0	6	13	0	0.65	1.40	0.002	0.31	1.00
NB Cabrillo On Ramp	0	8	17	0	0.26	0.55	0.002	0.26	0.75
SB Cabrillo Lt. Off Ramp	0	7	17	0	0.5	1.21	0.002	0.31	1.00
SB Los Patos Off Ramp	0	5	15	0	0.69	2.06	0.005	0.15	0.45

*low vehicular counts render actual data rates to not be statistically significant

Montecito Association (Richard Nordlund, President)

Comment 1 Alternatives

Three build alternatives were considered in the draft environmental document. Another six along with the Mixed-Use Lanes option were previously evaluated and eliminated. This information was explained in Sections 1.34 and 1.35 of the draft environmental document. The document also included the fact that the overall guidance for determining project alternatives was provided to Caltrans as part of the *101 In Motion* process and Measure A. In addition to project alternatives 1, 2 and 3 and those that were considered but rejected, many configurations were considered for the Cabrillo/Hot Springs Interchange (see Table 1.2). Five configurations for Cabrillo/Hot Springs were evaluated in the draft environmental document, but another 17 were considered and eliminated. Further clarification regarding feasibility of certain configurations was added to the final environmental document. A left-side ramps fact sheet was added to better highlight what could be considered within this section of U.S. 101 corridor.

Caltrans does not always identify an environmentally superior alternative during the draft environmental document stage. Additional language was added to the Volume I of the final environmental document that explains how Alternative 1 (preferred alternative) was designed with the goal of providing a combination of inside and outside widening that was designed to maximize opportunities for retaining and refining high-value resources including scenic views, wetlands, and landscaping.

Refer to Volume I (Section 1.3.6) and Volume II (Appendix J) for more information.

Montecito Association

Comment 2 Alternatives

Alternatives E and F (two alternatives originally considered for the project) both included room for median planters through the project limits. These alternatives were evaluated and rejected by the Project Development Team (refer to Section 1.3.5 of the draft environmental document and final environmental document). The Montecito portion of the project has the narrowest right-of-way width for the freeway within the project limits. To retain the median trees near the Sheffield Interchange would require encroachment into the railroad and the North Jameson frontage road. It would also require acquiring homes, some of which are historic, that front North Jameson.

Montecito Association

Comment 3 Traffic

Cabrillo Interchange Configurations R and S both included a northbound off-ramp that would exit to the existing roundabout. The two ramps were evaluated and rejected by the Project Development Team because they were geometrically infeasible and would require relocating the roundabout. See Table 1.3 in the draft environmental document and final environmental document.

Montecito Association

Comment 4 Environmentally Superior Alternative

The environmentally superior alternative does not need to be identified until the final environmental document is released. Refer to response to comment 1.

Montecito Association

Comment 5 Alternatives

Many interchange proposals were received by Caltrans through agents of the Montecito Association. Caltrans evaluated them all and found them incompatible with the proposed HOV lanes project. Caltrans final conclusions associated with the potential retention of left-side ramps were contained in the December 19, 2013 letter by Director Dougherty to the SBCAG Board Chair (See Volume II, Appendix K). Additional information on Caltrans findings associated with configurations that include left side off-ramps were provided directly to the Montecito Association in a letter signed by District 5 Director Timothy Gubbins on December 18, 2013. Letters referenced above can be located in Volume II, Appendix K.

See Appendix J for the Left-side Ramps Fact Sheet and Appendix I for more information.

Proposals to retain the existing planted median through Montecito were previously evaluated with Alternatives E and F; they were both rejected by the Project Development Team (see Volume I, Section 1.3.5).

Montecito Association

Comment 6 Alternatives Continued

Much discussion has occurred regarding left-side ramps. See Appendix J for a detailed factsheet created to answer the public's questions. And see Appendix I for an overview from the presentation made to the Santa Barbara County Association of Governments board in May 2013 that examines the various configuration options and explains results of the evaluation process.

Montecito Association

Comment 7 Design

Based on public comments received during review of the draft environmental document, the design for the Sheffield Interchange was reanalyzed to determine whether there were any viable options to retaining additional median landscaping. Based on this assessment, design was modified to provide additional separation between the northbound and southbound mainlines at Sheffield Drive Interchange from post miles 8.9 to 9.1 to increase the width of the median and to provide room for some median planting through the interchange. The new alignment also necessitates the addition of two retaining walls along the southbound mainline edge of the shoulder. The redesign does not include retaining left-side on- and off-ramps.

Montecito Association

Comment 8 Alternatives

J Modified was a locally named alternative that proposed to retain existing southbound lanes and add only one additional northbound lane with the associated bridge widening. This configuration assumed that a) the existing left-side off-ramps could be retained, b) a new southbound on-ramp could be constructed from Los Patos, and c) the existing northbound on-ramp at Cabrillo and northbound off-ramp at Hermosillo would be retained. Various components of this configuration were previously evaluated by the design team as they had been incorporated into other interchange configurations that had been proposed:

- The existing left-side ramps at this interchange have stopping sight distance problems that contribute to higher than average accident rates.
- Reconstruction of a standard on-ramp from Los Patos Way would require raising and reconstructing the railroad track 0 to 4 feet for 0.67 mile within the limits of the Sycamore Creek floodplain. The elevated

railroad would have some effect on existing views of the Andree Clark Bird Refuge as seen from the eastbound lanes. The temporary shoofly is expected to be relocated 0 to 30 feet (average distance is 15 feet) closer to the Andrée Clark Bird Refuge.

- The existing northbound on-ramp at Cabrillo and northbound off-ramp at Hermosillo are features that were proposed for Interchange Configuration F and others that had been rejected for other reasons. The adequacy of using the northbound off-ramp at Hermosillo Road is a functional operational accommodation of any relocated traffic. The continued use of the northbound on-ramp at Cabrillo is a reasonable proposal.

The proposal to connect the northbound off-ramp to the existing roundabout was evaluated in Interchange Configurations R and S. The existing geometry of the roundabout cannot accommodate a fifth entering leg, which would require reconstruction with a larger diameter roundabout. The roundabout would need to be physically moved up the hill to allow for room to connect all the approach legs. The Cabrillo approach leg could remain, but the other three existing approach legs would need realignment resulting in private property acquisition that would impact adjacent businesses. Furthermore, operations analysis associated with a five-leg roundabout at this location determined that adequate spacing between the new off-ramp approach into the roundabout at the adjoining Coast Village Road leg would need to be offset a distance of approximately 50 feet to provide for adequate operations and in so doing would result in substantial impacts to the existing shopping center and golf course.

Design exceptions for lane and shoulder widths have already been approved in Montecito where all new paving is proposed in the existing median with no outside paving proposed. This will effectively provide the option of retaining

outside landscaping and skyline trees for those locations. However, this outside landscaping may be at risk where soundwalls are proposed for construction on the right-of-way line. Purchasing right-of-way would not preserve any existing landscaping or skyline trees. Realignment of the freeway would be required to ensure that stopping sight distance would be sufficient to continuously plant the proposed median and have additional width to replant to the outside of the new pavement. These new landscaped areas would not “line up” or coincide with the existing landscaped areas and substantial “taking” of private property and impacts to historical properties within Montecito would occur. Costs associated with activities such as those discussed in this paragraph would be beyond the anticipated funding levels available to the project. See Volume I, Section 1.3.5 for more information.

The existing southbound left-side ramps overlap the area needed for addition of new lanes within the existing median for the proposed Sheffield Drive Interchange. Interchange layouts were explored for viability that included retention of the existing left-side ramps. Adding additional lanes to the outside of the existing lanes would cause right-of-way to be needed on both sides of the freeway. A new southbound lane would cause encroachment into the railroad and result in direct impacts to the southbound trees and landscaping. A new northbound lane to the outside would require the northbound ramps to be reconstructed, necessitating the relocation of North Jameson Lane and the purchase and removal of the homes fronting this location. These impacts would be the same whether retaining both ramps or only the one ramp.

Montecito Association

Comment 9 Significant Impacts

All phases were included in the environmental document. The final environmental document has been updated where necessary to further clarify

issues identified by the public. Specific changes were made to the preferred alternative in response to public comment.

Montecito Association

Comment 10 Traffic

Caltrans staff contracted with a consultant to prepare traffic studies that went above and beyond what is typically necessary for a highway project. This occurred as a courtesy to local agency staff. However, the impacts to intersections that are not otherwise being touched by the project are not required to be addressed. Because the traffic studies are lengthy and are incorporated by reference, only significant traffic impacts resulting from the project were included in the draft environmental document. This presented sufficient information to understand project impacts.

Montecito Association

Comment 11 Traffic

Existing conditions were analyzed using 2008 traffic data, taken shortly before construction of the Milpas to Hot Springs Operational Improvement project got underway. However, the traffic modeling performed to identify future conditions as part of the traffic studies accounted for the traffic changes that occurred once the new facilities opened.

Montecito Association

Comment 12 Traffic

The Preferred F Modified configuration includes refinements recommended by City of Santa Barbara staff associated with lane configurations in the interchange, future year northbound on-ramp volumes, as well as anticipated bicycle and pedestrian movements through the interchange. The proposed design of Configuration F Modified is not anticipated to have occurrences of traffic backing up into the existing roundabout from the northbound on-ramp at Cabrillo Boulevard. Eastbound traffic that is approaching the roundabout

will not adversely impact the operational characteristics of the roundabout. This is due in part because the flow of eastbound vehicles will be metered by the traffic signals enroute to the roundabout.

The Cabrillo Interchange Configurations F and J propose that the Hermosillo Road off-ramp be the only northbound exit at this interchange. The intersection of Olive Mill Road at Coast Village Road (traffic study intersection #39) was evaluated for operational changes. If either Configuration F or J was constructed, the 2040 level of service for morning and afternoon (in parentheses) peak hours for the intersection are projected to be as follows: No-Build Alternative - C(C); Interchange Configuration F - C(C); Interchange Configuration J - C(C). The traffic studies for these interchanges estimated that 146 additional cars in the morning peak and 144 additional cars in the afternoon peak will go through the roundabout in 2040 compared to the no-build condition. For interchange concepts F and J, expected increased traffic loading on Coast Village Road over the no-build condition would be attributed to all northbound traffic currently exiting on the left-side off-ramp being diverted to the right-side exit at Hermosillo Road. This diverted traffic would all be expected to turn left onto Coast Village Road to head north to Cabrillo Boulevard to access the beach.

The traffic study screened for the peak hour (warrant #3) only. For the intersection of Hermosillo Road at Coast Village Road (traffic study intersection #43), this warrant was met in 2040 for Cabrillo Interchange Configurations F, J and M. “The satisfaction of a traffic signal warrant or warrants shall not in itself require the installation of a traffic control signal.” – California Manual on Uniform Traffic Control Devices (CAMUTCD), Chapter 4C, Traffic Control Signal Needs Studies.

Montecito Association

Comment 13 Traffic Safety

When analyzing collisions for project initiation or development purposes, the Caltrans Traffic Safety unit uses the most recent 3-year collision data available from the Traffic Accident Surveillance and Analysis System (TASAS). Analyzing collision data over a 10-year range may not provide an accurate picture of current conditions. The exception to this is if there is little or no collision data, which can be the case with low-volume roads.

Accident rates for the northbound Hermosillo Road off-ramp, the northbound Cabrillo Boulevard median left off-ramp, the southbound Cabrillo Boulevard left off-ramp, and the southbound Los Patos Way off-ramp are all above the statewide averages for each ramp. Accident rates for the northbound Hermosillo Road off-ramp appear to be above the statewide average, but, due to extremely low traffic counts, the rate is too small a sample to determine if the collision rate is significant. Analysis of accidents for the other Cabrillo Boulevard Interchange ramps indicated excessive speed to be the common factors. As part of the Cabrillo Boulevard/Hot Springs Interchange reconfiguration, each of these ramps with the exception of Hermosillo Road is either being closed or relocated, which will eliminate left side exits, short deceleration lanes and crest vertical curves (those that have a tangent slope at the end of the curve that is lower than that of the beginning of the curve) with limited stopping sight distances. Based on these improvements, the rates of accidents are expected to drop for these interchange ramps.

The left-side ramps are being replaced because of their inconsistency with driver expectation of ramps to the right, which contributes to higher accident rates. The statewide average rate does not differentiate between left-side and right-side ramps, but compares ramps of similar length and traffic use. That is why the statewide average accident rate varies with different ramps on the

project. The data from Table 2-12 of the draft environmental document indicates that the left-side off-ramps at Cabrillo Boulevard northbound and southbound have 35% and 50% higher accident rates, respectively, than that of similar length and use ramps statewide.

Montecito Association

Comment 14 Design and Traffic

Caltrans acknowledges that the Railroad Bridge over Cabrillo Boulevard currently acts as a constriction point for bicycles and pedestrians. The HOV project includes elements that are essential to providing mainline congestion relief and reconstruction of the UPRR railroad bridge is not essential to the mainline or ramp modification work.

As noted in the final environmental document, Caltrans has coordinated with City of Santa Barbara staff to include refinements in the preferred F Modified configuration. Those improvements will: 1) improve operations at the ramp junctions and reduce queuing that would otherwise occur under the 2040 no-build condition (including queuing that would otherwise extend back into the Los Patos/Cabrillo intersection during peak times), and 2) provide bicycle and pedestrian improvements within the state highway right-of-way as part of this project to align with the improvements being planned on Cabrillo under the UPRR railroad bridge by the City of Santa Barbara and SBCAG (based on the best available information at this time).

The City of Santa Barbara, in coordination with SBCAG, has initiated a project to replace the UPRR Railroad structure and provide improved bicycle and pedestrian facilities within the vicinity of the UPRR railroad structure and the Los Patos/Cabrillo intersection. A consultant that has experience working with UPRR has been hired by the City to complete this work. The SBCAG Board has identified this project as a priority improvement and SBCAG is coordinating with the City to help develop and fully fund these improvements. Caltrans will

coordinate with the City and SBCAG on the UPRR and Los Patos/Cabrillo intersection improvements during the design and permitting phase of the HOV project and options for shared funding and/or concurrent construction efforts will be further discussed at that time.

More specifically related to Los Patos/Cabrillo intersection operations, the draft environmental document clarified in the Chapter 2 traffic section that this intersection is expected to operate at level of service (LOS) F in the year 2040 under future build conditions. This LOS output is based on the Highway Capacity Manual two-way stop control (TWSC) methodology. This methodology is based on worst approach control delay per vehicle, using the 2000 Highway Capacity Manual methodology and thus provides a single output that does not represent travel conditions for other intersection users. Conversely, all-way stop and signal-controlled intersection LOS in the 2000 Highway Capacity Manual is based on weighted average control delay per vehicle. At the Los Patos/Cabrillo intersection, the low LOS value indicated by the TWSC methodology is based on a limited number of vehicles making left turns that would experience a 95th percentile queue of 2-4 vehicles in 2040 from the side streets. Vehicles traveling through the intersection on Cabrillo Blvd, however, would experience little to no control delay. Under F Modified, if no further improvements were made at this intersection apart from this project, the average vehicle control delay in 2040 for vehicles that travel through this intersection would be 3.1 seconds/vehicle in the AM peak hour and 12.1 seconds/vehicle in the PM peak hour. Using a weighted average control delay methodology, this would represent a 2040 LOS value of "A" in the AM peak hour and LOS "B" in the PM peak hour.

With respect to the Olive Mill/Coast Village Road area, three interrelated intersections were analyzed as part of the traffic studies conducted for the project: Northbound off-ramp/Olive Mill (#39), North Jameson Lane/Olive Mill (#39a) and Southbound on-ramp/Olive Mill (#40). The table below shows

levels of service (LOS) and the seconds of delay for configurations F and F Modified as reported in the Cabrillo/Hot Springs Interchange Configuration Analysis Technical Memorandums (March 21, 2011 and July 19, 2011). This information supersedes the values shown in the Forecast Operations report as the superseding reports provide outputs related to specific Hot Springs/Cabrillo configurations.

ID		Existing Condition	2040 No-Build	2040 Build
39	NB off-ramp/ Olive Mill	D/31.3s -AM C/16.6s -PM	E/37.9s -AM E/47.9s -PM	E/37.9s -AM E/47.9s -PM
39a	North Jameson Lane/Olive Mill	C/15.4s -AM B/11.4s -PM	C/20.1s -AM C/16.7s -PM	C/20.1s -AM C/16.7s -PM
40	SB on-ramp/ Olive Mill	B/14.7s -AM B/14.4s -PM	C/17.1s -AM F/66.6s -PM	C/15.1s -AM E/38.1s -PM

Level of Service (LOS) identified by Letter grades; "s" = seconds

As noted in the table above, 2040 build conditions are projected to be the same or better than 2040 no-build conditions at these intersections. Impacts were identified in the traffic studies at this location since the LOS values were lower than "C" in the forecast year. Having an impact does not automatically make the impact significant under Caltrans criteria or CEQA criteria and the project traffic studies did not identify changes as significant environmental impacts under CEQA. Although local agencies may set their own thresholds for determining CEQA significance for local projects, when determining significance under CEQA, the State considers the type of project proposed-- a congestion relief project in this case--and the degree of increased delay at spot locations relative to the overall congestion relief benefits of the project.

As identified in Section 2.1.5 of the draft environmental document and the California Environmental Quality Act checklist in Appendix A, these impacts were considered to be less than significant per the California Environmental

Quality Act. Improvement of those intersections is outside the scope of this project and should be addressed separately.

Montecito Association

Comment 15 Traffic Safety

The southbound on-ramp from Posilipo Lane associated with the interchange of San Ysidro Road has not experienced accident rates higher than the statewide average; there were no recorded accidents for the three-year period from October 1, 2006 to September 30, 2009.

The Miramar Hotel Resort plan and permitting process is outside Caltrans' jurisdiction, but is under jurisdiction of the County. Caltrans is a commenting agency on that project. Past comments and concerns regarding potential traffic impacts of the redevelopment proposal for the Miramar resort have been submitted to the County. According to the County's response to comments for the Miramar Resort project issued on June 12, 2008, the proposed Miramar project would not significantly affect the southbound U.S. 101 on-ramp based on the County's California Environmental Quality Act thresholds. Based on this assessment, the County of Santa Barbara does not see any potential traffic impacts from the approved development.

According to California Highway Patrol reports and Caltrans records, there have been no significant vehicle accidents attributed to the on-ramp merge at Olive Mill and San Ysidro.

Widening the San Ysidro overcrossing structure is outside the scope of this project because the purpose and need of the project can be met without the need to reconstruct this structure. Reconstruction of this interchange can be planned as a separate project.

The Project Development Team did consider whether proposing auxiliary lane at this location would enhance operational performance and this analysis was included in the Forecast Operations Report. This auxiliary lane analysis showed that there would be some operational benefits associated with installing auxiliary lanes at this location. These improvements, however are not essential to the purpose and need of the HOV project and could be constructed separately with another project in the future. Furthermore, the HOV project lane additions are occurring within the existing median area at this location and this work does not preclude the installation of an auxiliary lane as part of a separate project. In the interest of controlling cost and scope and to minimize impacts, it was recommended that only required auxiliary lane locations be included. It was noted that one auxiliary lane (between the new Sheffield on-ramp and the Evans off-ramp) was required for all build alternatives due to the newly proposed Sheffield on-ramp.

Auxiliary lane improvements could be studied as part of a separate San Ysidro Interchange reconstruction project, as mentioned above. Alternatives to improve local street operations at this location may or may not benefit from the inclusion of auxiliary lanes.

Montecito Association

Comment 16 Bicycle Safety

The soundwalls will generally be built in the same location as the current right-of-way fence. The fact that a soundwall will replace a fence poses no new challenges to bicyclists. Coordination with the County will occur throughout the design phase. Opportunities for making improvements to bicycle travel in this area can be discussed further during that time.

Montecito Association

Comment 17 Visual

The draft environmental document made the finding and fully disclosed that substantial adverse visual impacts on scenic vistas, substantial damage to scenic resources, and substantial degradation of visual character would occur as a result of the project. The draft environmental document also made the finding that these adverse impacts, though lessened through specific mitigation measures listed in the document, would not reduce the impacts to a less than significant level.

The existing landscaping through Montecito is recognized as an important aesthetic resource of high value to the communities as well as the traveling public. In addition, a guiding principle of the project design is to preserve as much existing vegetation as possible. Where existing vegetation cannot be preserved, the project will be re-landscaped to the greatest extent possible considering safety and maintenance requirements. Refinement of aesthetic landscaping design details, although not required to meet the intent of mitigation, will be developed in collaboration with representatives of each affected community. In addition, each permitting jurisdiction may require additional measures beyond the mitigation identified in the draft environmental document.

Montecito Association

Comment 18 Visual

The draft environmental document and final environmental document fully disclosed the potential impacts to landscaping through the Montecito area. The value of skyline trees, median planting and roadside landscaping was shown in photographs, photo-simulations, and numeric and narrative analysis. Identified mitigation measures represent a “reasonable worst-case scenario,” are specifically related to impacts, are implementable and feasible, and are consistent with state and national safety design practices.

Montecito Association

Comment 19 Visual Quality

The draft environmental document found that the project would result in significant unavoidable adverse visual impacts. Cumulative visual impacts were clearly included in that finding as evidenced by the following statement on page 425: “Mitigation measures, combined with proposed project features such as replacement landscaping and aesthetic treatments to walls, would lessen the adverse visual change to the corridor. However, because of the inherent alteration of scale, increase of hard surface, and loss of vegetative character, substantial adverse cumulative visual impacts would occur in this corridor.”

Montecito Association

Comment 20 Visual

The draft environmental document included five representative viewpoints specifically of the Cabrillo/Hot Springs interchange, including ground-level photo-simulations and analysis. The viewpoints show both on-highway and local roadway perspectives. Any proposed retaining walls are shown in the simulations where applicable. All proposed retaining walls are described and analyzed regardless of their complete visibility in certain photo-simulations. Also, the Environmental Impact Report/Environmental Assessment identified the specific visual effects of the proposed walls and included measures such as aesthetic treatment and planting to reduce adverse visual effects.

The draft environmental document included two representative viewpoints specifically of the Sheffield Drive undercrossing, including ground-level photo-simulations and analysis. Proposed lanes, loss of planting, and soundwalls are shown in the simulations. All proposed changes including the above elements are described. In addition, there is discussion about the specific visual effects to the existing scenic views and visual character at the Sheffield undercrossing. As a result, the draft and final environmental documents

include measures such as aesthetic treatments and planting to reduce adverse visual effects.

Observer Viewpoint 9 analysis and images shown on pages 150-153 of the draft environmental document provide a representative view of the increase of visual scale, lanes, soundwalls, and vegetation removal that would occur along U.S 101 between Sheffield Drive and Evans Road.

Montecito Association

Comment 21 Visual

The draft environmental document found that the project would result in significant unavoidable adverse visual impacts in large part due to the alteration of visual character. The draft environmental document included two representative viewpoints specifically of the Sheffield Drive undercrossing, including ground-level photo-simulations and analysis. Proposed lanes, loss of planting, and soundwalls are shown in the simulations. All proposed changes including the above elements are described. In addition, the draft environmental document discussed the specific visual effects to the existing scenic views and visual character at the Sheffield undercrossing. As a result, the draft environmental document included measures such as aesthetic treatments and planting to reduce adverse visual effects. Identified mitigation measures defined in the draft environmental document represent a “reasonable worst-case scenario,” are specifically related to impacts, are implementable and feasible, and are consistent with state and national safety design practices.

Montecito Association

Comment 22 Visual

The draft environmental document fully disclosed the potential effects to scenic views and character throughout the project corridor. The value of existing quality views, skyline trees, median planting, roadside landscaping

was shown in photographs, photo-simulations, and numeric and narrative analysis. Identified mitigation measures represent a “reasonable worst-case scenario,” are specifically related to impacts, consistent with project purpose and need, are implementable and feasible, and are consistent with state and national safety design practices.

Montecito Association

Comment 23 Noise

Installing a noise-reducing pavement treatment on U.S. 101 is a proposed feature of the project. According to Caltrans Technical Noise Supplement, 2009, applying noise-attenuating pavement surface treatment reduces noise by up to 5 dBA. However, because technology for paving treatments is still undergoing study, forecasting future long-term benefits is not possible. Therefore, the Federal Highway Administration does not recognize pavement treatment as a noise abatement measure, and road surface treatment benefits cannot be quantified to determine benefits in noise reduction.

Montecito Association

Comment 24 Noise

The statement in Chapter 3 of the draft environmental document regarding a 12 dBA increase being used as a CEQA threshold for significance was incorrect. Under CEQA, Caltrans evaluates noise impacts by looking at the baseline versus the predicted noise levels. Table 2.37 and Section 3.2.1 (Noise) in Volume 1 of the final environmental document show a project build noise level increase of a maximum of 3 dB above the existing noise levels. This increase is not considered substantial and is in fact considered minimal according to the Caltrans Technical Noise Supplement. Therefore, the project is not expected to cause significant noise impacts under the California Environmental Quality Act.

It also should be noted that Caltrans is not required to use local noise standards when determining the significance of impacts under CEQA and NEPA. Caltrans understands that local standards may differ from state and federal standards. Local noise standards are not applicable to state highway projects. Caltrans maintains consistency in applying state and federal standards equally across the state. When there is an inconsistency between state and local standards, state standards must be followed.

Montecito Association

Comment 25 Noise

See the response to comment 24.

Montecito Association

Comment 26 Noise

A Noise Abatement Decision Report was prepared for the project to estimate the construction cost for the feasible noise abatement measures identified in the Noise Study Report and determine if noise abatement is financially reasonable per Caltrans 2006 Noise Protocol. The overall reasonableness of noise abatement is determined by many factors. Main factors that affect reasonableness include the cost of noise abatement, absolute noise levels, existing noise versus design-year noise levels, achievable noise reduction, date of development along the highway, life cycle of noise abatement measures, and environmental impacts of abatement construction.

Cost considerations for determining noise abatement reasonableness are evaluated by comparing reasonableness allowances and projected costs. Under this protocol the value of the home does not change the cost allowance. To do so would conflict with Federal environmental justice policies. As noted in Chapter 3 of the final environmental document noise is not considered to be a significant impact under CEQA for this project and as such no mitigation for noise impacts is required.

Montecito Association

Comment 27 Design

The Draft Project Report indicates earthwork quantities for the entire project—ranging from 275,000 cubic yards to 324,000 cubic yards, depending on the various alternatives, which is only a 17% differential. There is no detail within the Draft Project Report that estimates quantities by “segments” within the project limits. That level of detail will not be available until the design phase of the project.

Montecito Association

Comment 28 Cultural Resources

The Vibration Report prepared in June 2011 and the Addendum Vibration Report prepared in September 2013 provide the calculated safe distances from vibration sources for structures of various ages and also list the actual distances of historic structures from vibration sources. These reports document that no historic structures will be affected by vibration from the project. This conclusion is also stated in Section 2.1.7 (Cultural Resources) and Section 2.4 (Construction Impacts) in Volume 1 of this environmental document.

Montecito Association

Comment 29 County of Santa Barbara 101 Corridor Design Guidelines

For Objective 4—The project proposal is to construct two additional lanes, which requires many existing structures to be modified and/or replaced. Design exceptions for lane and shoulder widths have allowed the existing structure at San Ysidro Road to remain unmodified. The northbound structure at Sheffield Drive is currently 29 feet wide, which is insufficient for three lanes of traffic, and must be widened or replaced. The northbound structure at Cabrillo Boulevard is 28 feet wide, which is also insufficient for three lanes of traffic. Although the existing southbound structure at Cabrillo Boulevard

currently carries three lanes of traffic, both Cabrillo Boulevard structures were evaluated for widening or replacement based on the various proposed interchange configurations. The existing structures along this freeway corridor were designed and built to accommodate a four-lane freeway, therefore, it is infeasible to maintain all the current structures and mature landscaping and accommodate the construction additional lanes.

For Objective 7—The Montecito Parkway was evaluated for National Register eligibility in 1989 in connection with the Santa Barbara Six-Lane project and was determined to lack sufficient design integrity for eligibility because of the numerous alterations it has undergone. The State Historic Preservation Officer concurred with this original determination on January 25, 1993. The resource was reevaluated in connection with the proposed South Coast 101 HOV Lanes project and was again determined to lack sufficient integrity for eligibility. It was further determined that the Montecito Parkway does not constitute a historical resource for the purposes of the California Environmental Quality Act. The State Historic Preservation Officer concurred with this determination on January 26, 2011. Although there may be visually familiar and aesthetic landscape features that were part of the original Montecito Parkway as envisioned in the 1930 Tilton Plan, there are no historically significant aspects of the extant Montecito Parkway.

For Objective 8—As part of this project in the Montecito area, many design exceptions for lane widths and shoulders have already been approved at certain locations to avoid widening at the outside edge of pavement. These design exceptions allow for maximum retention of the outside landscaping areas.

For Guideline G1—The proposed design for the Sheffield Interchange structure has been reevaluated. Realignment of the proposed freeway lanes at this interchange accommodates a design change that proposes two

separate structures with a small separation between the two that provides a planting area. The profile of the southbound lanes must be raised to match the profile of the northbound lanes to allow for a diamond interchange to replace the left-side southbound ramps.

The landscaping through Montecito is recognized as an important aesthetic resource of high value to the communities as well as the traveling public. A guiding principle of the project design is to preserve as much existing vegetation as possible. Where existing vegetation cannot be preserved, the project will be re-landscaped to the greatest extent possible considering safety and maintenance requirements. Also, all landscaping and aesthetic design elements will be developed in collaboration with representatives of each affected community.

For Guideline G2—Eliminating proposed retaining walls would require significant additional grading and associated right-of-way acquisitions. The use of retaining walls allows for the proposed freeway improvements to be contained within the existing right-of-way and maintains the existing frontage road and adjacent development without disturbance.

For Guideline S5—Including planted medians within the Montecito area and providing for two additional lanes would require significant right-of-way acquisition, including the relocation and reconstruction of Coast Village Circle, North Jameson Lane and South Jameson Lane. Several historic homes would need to be removed. This proposal would have significant costs, impacts to historic properties, and community disruption. These costs and impacts were explored with Alternatives E and F and rejected by the Project Development Team for further consideration.

Montecito Association

Comment 30 Suggestions for Safety and Design

Union Pacific Railroad will not consider any enhanced use of the existing bridge without replacement. Its policy states that a sacrificial beam must have a vertical clearance of at least 16 feet-6 inches for short bridge spans such as the Los Patos Bridge. A sacrificial beam is one that would be placed over the roadway in advance of an underpass structure. A sacrificial beam is used so that if the bridge were hit by tall passing vehicles or loads, the beam would deform but not threaten the structural integrity of the railroad bridge.

selected configuration would add another northbound off-ramp near the roundabout and satisfy your concerns.

Montecito Association

Comment 31 Design Suggestion

The design exception process is project specific. Previous design exceptions have no bearing on future project decisions. Caltrans has approved design exceptions for the South Coast 101 HOV Lanes project that reduce lane and shoulder widths in the Montecito area to allow for retention of the outside parkway landscaping between the freeway and the frontage roads. In some locations, all six lanes are proposed to be 11 feet wide with 2-foot-wide inside shoulders and a single concrete barrier between the Sheffield Interchange and Miramar. For the rest of the Montecito area, the inside shoulders are proposed to be 7 feet wide. Reducing these lane and shoulder widths further for the purpose of reserving median planters could not be justified by a design exception. If additional width were available, the first priority would be compliance with traffic standards by providing standard width lanes and shoulders. Any excess width would then be available to consider for median planting.

Montecito Association

Comment 32 Traffic Circulation

Caltrans and the Project Development Team have selected the F Modified configuration for the Cabrillo Boulevard/Hot Springs Road Interchange. This



Floyd Wicks
<floyd1647@gmail.com>
05/01/2012 11:39 AM

To: <Scott_Eades@dot.ca.gov>
cc:
Subject: Fwd: Highway 101 Widening

Hi Scott,

As a follow up to my email below, I'm attaching a short video which emphasizes the current traffic issue at San Ysidro Road. It's a hazard for those travelling on Hwy. 101 south and it's like this every morning (evenings too) that school is in session on San Ysidro Rd. (Laguna Elementary and Montecito Union). All the more reason to take a closer look at closing the southbound ramp at Posilipo Lane and provide for a proper "fix" at San Ysidro Road. Even if a new southbound ramp were installed half-way between San Ysidro Road and Posilipo Lane, it would be much better than the current situation and would be an "at-grade" ramp southbound, with a much safer entrance than the current ramp at Posilipo.

Thank you,

Floyd

----- Forwarded message -----

From: **Floyd Wicks** <floyd1647@gmail.com>

Date: Sat, Apr 21, 2012 at 11:00 AM

Subject: Highway 101 Widening

To: Scott Eades@dot.ca.gov

Cc: Joanne Chere <jchere80@gmail.com>, John Chere <joech1@msn.com>, Ann Richards <annrichards6@gmail.com>, Ed Richards <erichards.rz@gmail.com>, Doralee Jacobson <doralee@badelnet.com>, valentinop@cox.net

Dear Mr. Eades,

I've looked at all 3 Alternatives on the following link:

http://www.dot.ca.gov/dist05/projects/sb_101hov/index.html There are two issues to bring to your attention, as follows:

- In all three Alternatives, there is a proposed Sound wall shown on the **NORTH** side of Hwy 101 in the vicinity of Oak Creek, but none shown on the north side. Surely this is an oversight on the part of CalTrans, especially in light of the expected expansion of traffic flow, currently at about 90,000 vehicles per day. It is my understanding that by 2020, it will increase to 99,000 and by 2040 it will reach 127,000 vehicles per day. CalTrans should construct a Sound wall to match the existing Sound wall heading easterly from Posilipo Lane. By closing the on-ramp to 101 South at Posilipo Lane, a new Sound wall could be built from the intersection of S. Jameson Lane westward about 900 feet to the northeast corner of the Miramar Hotel property. The Miramar Hotel plans call for a Sound wall to be built along the entire frontage of the Hotel's boundary which abuts S. Jameson Lane, thus the reason for requesting only 900 feet. The referenced 900 feet of Sound wall is needed to avoid the increase in noise caused by CalTrans building a Sound wall on the **NORTH** side of Hwy 101, as well as the existing and expected increase in traffic as a result of the widening project. Our property is located at the southwest corner of S. Jameson Lane and Posilipo Lane. The condominium project was built in 1990, when the vehicular traffic was recorded at 81,000 vehicles per day. You are welcome to check the decibel levels today, compared to the tests which were conducted in the 1980s; prior to the construction of our project.

- A second point references the southbound on-ramp at S. Jameson Lane and Posilipo Lane. The frontage road, S. Jameson Lane, is currently used by MANY, as part of the on-ramp itself, i.e. they completely ignore the Stop Sign at the named intersection, which creates a very dangerous condition. Consideration should be given to widening the 2-lane bridge at San Ysidro Road (Mile Post 10.02) and include a southbound on-ramp at that location. Such a move would create a much safer environment for everyone, including the drivers, who take their lives into their hands when entering traffic on such a short on-ramp as the one at Posilipo Lane. There are three other ramps at San Ysidro Road (two off ramps N. and S. and one on-ramp N.) and one more heading southbound makes all the sense in the world. The ramp at Posilipo Lane and S. Jameson Lane could then be permanently closed.

Your consideration of the above points will be very much appreciated by our entire Homeowners Association members, copied on this email for future reference.

Best regards,

Floyd Wicks
1647 Posilipo Lane
[805-455-1670](tel:805-455-1670)



IMG_0613.MOV



Floyd Wicks
<floyd1647@gmail.com>
06/21/2012 03:49 PM

To: Matt Fowler <South.Coast.101.HOV@dot.ca.gov>
cc: "Tittle, Jeremy" <jtittle@co.santa-barbara.ca.us>, John Chere
<jpedch1@msn.com>, Joanne Chere
<jchere80@gmail.com>, Ed Richards
<erichards.rz@gmail.com>, Ann Richards
<annrichards6@gmail.com>, Doralee Jacobson
<doraleej@bagnet.com>, Floyd Wicks
<floyd1647@gmail.com>, <valentinop@cox.net>
Subject: Highway 101 Project Concerns

Dear Mr. Fowler

At the suggestion of Mr. Jeremy Tittle, copied herein, this communication formally expresses the concerns of the Montecito Estates Homeowners Association, in reference to the Highway 101 widening project. Our primary objective in delineating our concerns is to provide comments for consideration by CalTrans, which will, if implemented, result in significant safety improvements and an enhanced "neighborhood" environment for the area known as Fernald Point.

Please note that Mr. John Chere is President of the Association's Board and the Board of Directors has directed me to be the spokesperson for the group, consisting of the following homeowners at the respective addresses shown:

Unit A: Mr. John Chere and Mrs. Joanne Chere
Unit B: Mr. Ed Richards and Mrs. Ann Richards
Units C&D: Ms. Doralee Jacobson
Units E&F: Mr. Floyd Wicks and Mrs. Diana Wicks

Montecito Estates Homeowners would greatly appreciate your support in getting CalTrans to consider the broader impacts of the widening project through Montecito, more specifically in the area between San Ysidro Road and Posilipo Lane, where the Miramar Hotel is located adjacent to Montecito Estates' westerly property line. The following issues, in part, have been brought to the attention of CalTrans, but a State agency such as CalTrans doesn't have the same interests as the residents of Montecito, as evidenced by the myriad complaints being presented to CalTrans about the Project's proposed HOV lanes, for example.

We need your help in making effective changes to the project, as expressed in the following areas of concern:

1. **The southbound on-ramp at S. Jameson Lane and Posilipo Lane should be CLOSED PERMANENTLY.** The frontage road, S. Jameson Lane, is currently used by MANY, as part of the southbound on-ramp itself. Many people completely ignore the Stop Sign at Posilipo Lane and S. Jameson, which creates a very dangerous condition. Consideration should be given to constructing a southbound on-ramp at San Ysidro Lane and then closing the southbound ramp at Posilipo Lane. Such a move would create a much safer environment for everyone, including the drivers, who take their lives into their hands when entering traffic on such a short on-ramp as the one at Posilipo Lane. There are three other ramps at San Ysidro Road (two off ramps N. and S. and one on-ramp N.). One more ramp heading southbound makes all the sense in the world, especially with the expected increase in traffic along S. Jameson Lane, caused by the pending opening of the new Miramar Hotel. Knowing of the unsafe condition of the current southbound ramp at Posilipo Lane and not addressing it NOW with CalTrans, would be increasing the risk of many more people who are certain to be using the fine facilities of the new Miramar Hotel.

We all favor a safer Hwy 101 and an improved "neighborhood" environment; unlike the current **"speedway"** known as South Jameson Lane. Numerous drivers actually begin their acceleration onto the southbound ramp at Posilipo Lane, WAY BEFORE the on-ramp. Totally ignoring the Stop Sign, they blast onto the ramp, due to the short, unsafe nature of the Posilipo Lane on-ramp. Hence the reason for our wanting the ramp closed.....it is truly an accident waiting to happen.

2. **Sound Attenuation:** In all three CalTrans Alternatives, there is a proposed Sound wall shown on the **NORTH** side of Hwy 101 in the vicinity of Oak Creek, but no sound attenuation shown on the south side. It was my hope that this was a simple oversight on the part of CalTrans, especially in light of the expected expansion of traffic flow, currently at about 90,000 vehicles per day. It is my understanding that by 2020, daily traffic flow will increase to 99,000 and by 2040 it will reach 127,000 vehicles per day. After attending the meeting hosted by CalTrans at the Montecito Country Club, it became clear that CalTrans has determined that a wall on the south side of the proposed 6-lane Freeway is "not financially feasible". It is in the best interests of many Montecito residents that CalTrans reconsider construction of a sound barrier heading westerly from Posilipo Lane. By closing the on-ramp to 101 South at Posilipo Lane, a new Sound wall could be built from the intersection of Posilipo Lane and S. Jameson Lane westward about 900 feet to the northeast corner of the Miramar Hotel property. CalTrans should take into account, the proposed architecture of the new Miramar Hotel, so that the final result looks like someone really took the time to "plan" a community improvement that makes sense for all. Sound attenuation doesn't always have to take the form of a large, bulky sound wall, but rather could be something that is befitting to the

nature of the neighborhood. The referenced sound abatement is needed to avoid the increase in noise and toxicity caused by CalTrans building a Sound wall on the **NORTH** side of Hwy 101 (which will reverberate increased decibels to the south side of HWY 101), as well as the existing and expected increase in traffic caused by the widening project. Our property is located at the southwest corner of S. Jameson Lane and Posilipo Lane. The Montecito Estates project was built in 1990, when the vehicular traffic was recorded at 81,000 vehicles per day. You are welcome to check the decibel levels today, compared to the tests which were conducted in the 1980s; prior to the construction of our project. Even CalTrans has listed today's decibel levels at 74 (average). This is wholly unacceptable; especially knowing that with 6 lanes, the fumes will only increase, along with the noise.

3. Consideration should also be given to widening the 2-lane bridge at San Ysidro Road (Mile Post 10.02), in concert with constructing a southbound on-ramp at that location and then permanently closing the southbound on-ramp at Posilipo Lane. Even at today's traffic volume, school buses and other vehicles are backed up so far on the southbound San Ysidro Road off-ramp, that they are stuck in the Highway 101 traffic lane at times.

FYI, I've looked at all 3 Alternatives on the following link:

http://www.dot.ca.gov/dist05/projects/sb_101hov/index.html, which is provided for your reference.

Your consideration of the above points will be very much appreciated by our entire Homeowners Association members and Property Manager, copied on this email for future reference. It is my understanding that the CalTrans comment period has been extended to July 6, 2012 and therefore, could you please let our Homeowners know what you intend to do with our stated issues? Please feel free to call me at any time; my cell phone is: [805-455-1670](tel:805-455-1670).

Respectfully submitted,

Floyd E. Wicks
1647 Posilipo Lane, E&F
Montecito, CA 93108

In the interim, we would greatly appreciate anything you can do to have CalTrans and/or the County of Santa Barbara install a significant speed bump at the stop sign on South Jameson Lane at Posilipo Lane.

The responses below cover both comment letters from Floyd Wicks.

Montecito Estates Homeowners Association – (Floyd Wicks)

Comment 1 On-ramp Design

Although the on-ramp at Posilipo Lane does not connect directly to San Ysidro Road, it is very similar to other interchange configurations within the project, such as the Evans Avenue Interchange and the S. Padaro Interchange. The existing San Ysidro Road southbound on-ramp does have a shorter-than-standard acceleration lane, but the historic accident record for the three-year period from October 1, 2006 to September 30, 2009 indicated accident rates less than the expected statewide rates for similar ramps. To construct the ramp nearer to San Ysidro Road would require the relocation of S. Jameson Lane to obtain sufficient room to build a ramp. Also, reconstruction of the San Ysidro Interchange, which is not geometrically necessary for the construction of the HOV lanes, is not planned by Caltrans as part of this project.

Montecito Estates Homeowners Association – (Floyd Wicks)

Comment 2 Noise

As a result of comments received, Caltrans staff reevaluated soundwalls for high-density residential areas to identify short sections of soundwalls that might be financially reasonable. When Soundwall S489 was reevaluated, it was found that one residential unit was not accounted for in the Noise Study Report. But, the additional unit did not change the conclusion that a wall in this area is not financially reasonable. No additional southbound soundwalls were recommended for construction near Posilipo. See Volume I, Section 2.2.7, for more information on Soundwall S489.

Refer to response to comment 1 in regard to closing the southbound on-ramp at Posilipo Lane.

Montecito Estates Homeowners Association – (Floyd Wicks)

Comment 3 On-ramp Design

According to the Federal Highway Administration website http://www.fhwa.dot.gov/environment/noise/noise_barriers/design_construction/keepdown.cfm, studies show that noise reflection by barriers to residences on the opposite side of the highway is unlikely. In fact, noise levels from any type of reflection would not normally exceed 1 to 2 dBA, an increase that is not perceptible to the average human ear. The lower noise levels are due to the fact that not all of the acoustical energy is reflected back to the opposite side of the highway. Some of the energy goes up and over the barrier, some of the energy is reflected to points other than the homes on the opposite side, some of the energy is scattered by ground cover (grass and shrubs), and finally some of the energy is blocked by the vehicles on the highway. In addition, a portion of the reflected energy is lost due to the longer path that it must travel.

Many studies have documented a relationship between the presence of barriers (soundwalls) and the concentrations of air pollution. Field conditions can vary dramatically (geometric distances from road to wall to house, wall heights, prevailing wind speed and direction). Furthermore, air pollution plumes will vary based on wind speed, wind direction, temperature, and humidity so that a prediction of a wall's effectiveness in reducing air pollution cannot be made. The latest studies show that walls will likely have no impacts to air quality at distances greater than 300 feet.

Montecito Estates Homeowners Association – (Floyd Wicks)

Comment 4 San Ysidro

Reconstruction of the San Ysidro Interchange is not geometrically necessary for the physical construction of the South Coast 101 HOV Lanes project and is therefore outside the scope of this project. Note that the recently scoped

rehabilitation project that covers the same post mile limits may ultimately include changes to this ramp.

Montecito Estates Homeowners Association – (Floyd Wicks)

Comment 5 San Ysidro

The stop sign at San Ysidro is outside of the State right-of-way. Since it is important to ensure vehicles entering the freeway are moving at the same rate of speed as the flow of traffic, there should be no further disruptions to the vehicles that must accelerate to merge onto the on-ramp.



Madeleine Mueller
 <missco1@msn.com>

05/24/2012 02:08 PM

To: <scott_eades@dot.ca.gov>
 cc:
 Subject: Hwy 101 widening at Santa Claus Lane

From: missco1@msn.com
 To: scotteades@dot.ca.gov
 Subject: Hwy 101 widening at Santa Claus Lane
 Date: Thu, 24 May 2012 18:50:56 +0000

Dear Mr. Eades:

As the owner of the 39,000 sq. foot commercial site housing the Padaro Grill on Santa Claus Lane, I'd like to ask you to please be cognizant of the popularity of Santa Claus Lane, and the needs of the businesses there, when finalizing your plans for the widening of 101 in that area.

If you would be so kind, could you please consider the expansion of the highway toward the median section of the freeway adjacent to Santa Claus Lane, in order to avoid constructing a retaining wall along Santa Claus Lane right in front of the businesses? As I recall, the Toro Canyon Plan, which governs Santa Claus Lane, called for a clear path of visibility for views of Santa Claus Lane and the ocean from US 101...certainly the property owners on the Lane are aware of that view corridor restriction.

Also, would you be mindful of the great need for parallel parking along the north side (mountain side) to be maintained on Santa Claus Lane for the businesses? On a sunny day, the beachgoers and the customers of the respective businesses all have to fight for the parking spaces on the street. Should a retaining wall be built, many much-needed parking spaces would be lost, to the great detriment of the businesses and beachgoers alike.

Also, the functionality and safety of Santa Claus Lane would be greatly enhanced if the southbound onramp from Santa Claus Lane to the freeway was extended all the way to Carpinteria Avenue...thereby avoiding the weird bottleneck at Sand Point and the problem of people speeding down Santa Claus Lane in order to access the freeway rapidly, endangering people who are crossing the Lane to patronize the various businesses.

A dedicated bike path connecting Santa Claus Lane to Carpinteria would also enhance safety.

Finally, any efforts you could make to minimize noise and disruption to the traffic on Santa Claus Lane during the construction period would be greatly appreciated. The ongoing efforts of various property owners on the Lane to improve and upgrade their businesses are becoming quite apparent...we'd hate to see those efforts wasted or suffer major setbacks because traffic

flow on the Lane would be hindered by construction...

Thank you for your kind attention to our requests.

Sincerely,
 Madeleine M. Mueller
 President,
 Morehart Land Co.
 PO Box 1209
 Carpinteria, Ca 93014

Morehart Land Co. (Mueller, Madeleine)

Comment 1 Design

After consideration of public input, the Project Development Team has selected Alternative 1 as the preferred alternative, with the condition that the area paralleling Santa Claus Lane not be widened to the outside. This removes the necessity of building a retaining wall near the southbound on-ramp from Santa Claus Lane.

Morehart Land Co. (Mueller, Madeleine)

Comment 2 Traffic

Current parallel parking on Santa Claus Lane is outside the State right-of-way and will not be affected by any proposed alternative of this project, with or without a retaining wall.

Morehart Land Co. (Mueller, Madeleine)

Comment 3 HOV Lanes

The HOV lanes project proposal is limited to elements that are essential for providing mainline congestion relief. The operational need for an auxiliary lane (or merging lane) from Santa Claus Lane to Carpinteria Avenue was evaluated at this location. An auxiliary lane analysis in the Traffic Operations Report showed that there would be some operational benefit received by installing auxiliary lanes at this location. There would, however, be impacts due to the added pavement required for installation and the purpose and need for the project could be met without the inclusion of the auxiliary lanes. Furthermore, this project is providing lane additions within the median at this location and this work does not preclude the installation of an auxiliary lane as part of a separate project. In the interest of controlling cost and scope and to minimize impacts, the project development team has recommended that only required auxiliary lane locations be included.

Morehart Land Co. (Mueller, Madeleine)

Comment 4 Bike Path

The Santa Barbara County Association of Governments has taken the lead on a separate project that will be considered as part of the Local Coastal Plan Amendment package for the City of Carpinteria. The project proposes to provide a Bike Path between Santa Claus Lane and Carpinteria Avenue. This Class I path will close the bikeway gap at this location.

Morehart Land Co. (Mueller, Madeleine)

Comment 5 Noise

The contractor would be required to follow the Federal Highway Administration Noise Standards and the Caltrans Noise Protocol to minimize noise levels during construction to address noise impacts, which should reduce perceptible changes in noise levels (see section for noise measures during construction). No additional traffic congestion is anticipated for Santa Claus Lane while the freeway construction occurs. Please refer to Section 2.4 (Construction Impacts) in Volume 1 of the environmental document for more information.

**NYGREN
CONSULTING**

Creating High-Performing Boards

May 14, 2012

Mr. Matt Fowler
50 Higuera Street
San Luis Obispo, CA 93401

Dear Matt:

We are paying close attention to the complex HOV lane project proposed for the Montecito area. My partner and I, Louis Almaraz, moved to Montecito just over a year ago at the intersection of Hot Springs Road and Summit Road. This is the first street off the traffic circle and at the end of Hermosillo. The noise of Highway 101 is a huge issue that continues to deteriorate the value of a \$4 million investment in this community. We are very concerned about the following:

1. Whatever decision is reached must address the sound pollution from Highway 101. | 1
2. The Hermosillo Exit is not suitable for more traffic. The Von's store parking lot traffic volume creates very dangerous conditions already and further congestion here makes no practical sense. If you do a controlled study of traffic, you will quickly find that Hot Springs Road is already over-tracked in this location for the size of the road. | 2
3. The traffic flow on Hot Springs at Summit needs to be controlled more tightly with stop signs in both directions due to the Montecito Country Club traffic on Summit Road. I live on Summit Road and it is hazardous getting onto Hot Springs already. More traffic or seeing Hot Springs as a main artery from Highway 101 is not prudent in terms of safety. | 3

Solution Proposed:

Might it be possible to exit at Hermosillo and have an underpass immediately under Highway 101 that would then resolve on the West/South side of Highway 101 at Cabrillo Street at the interchange of Cabrillo and Los Patos Way. This would perhaps disrupt the Santa Barbara Cemetery but those citizens resting are less vocal and agitated than those of us living here. This proposal would also not adversely impact the recently installed traffic circle and would not impact Coast Village Road, except the elimination of the Chevron gas station. While that in itself is regrettable for travelers, I am sure the community will use the station at the other end of Coast Village. | 4

We don't envy your difficult position while trying to work out a solution for the community. We would be happy to discuss alternatives with you. We have walked this terrain carefully and can imagine reasonable alternatives. Being so close to the conditions of the neighborhood and traffic patterns, we are happy to be helpful. There are several solutions that might work.

We are grateful for your efforts.



David J. Nygren, Ph.D.
President

Cc: Richard Nordlund
Montecito Association

Louis Almaraz
Village Properties

**NYGREN
CONSULTING**

1077 Summit Road, Montecito, CA 93108

1

Nygren, David J.**Comment 1 Noise**

Noise was examined in the Noise Study Report prepared for the project in March 2010. The Noise Study Report identified land uses and sensitive receptors, particularly areas of frequent human use that would benefit from reduced noise levels. Frequent human use is described as outdoor activity areas, such as residential backyards, decks, common outdoor use areas for motel/hotels, school playgrounds, and common use areas at multi-family residences. Feasibility of noise abatement is basically an acoustical and engineering concern. A minimum 5-dBA reduction in the future noise level must be achieved for an abatement measure to be considered acoustically feasible. In addition, a Noise Abatement Decision Report was prepared for the project to estimate the construction cost for the feasible noise abatement measures identified in the Noise Study Report and determine if noise abatement is financially reasonable. The overall reasonableness of noise abatement is determined by many factors. Main factors that affect reasonableness include the cost of noise abatement, absolute noise levels, existing noise versus design-year noise levels, achievable noise reduction, date of development along the highway, life cycle of noise abatement measures, and environmental impacts of abatement construction. Cost considerations for determining noise abatement reasonableness are evaluated by comparing reasonableness allowances and projected costs. See Volume I, Section 2.2.7, for more information on criteria for determining when an abatement measure is reasonable and feasible.

Nygren, David J.**Comment 2 Traffic Design**

The Project Development Team selected the F Modified configuration for the Cabrillo Boulevard/Hot Springs Road Interchange. The F Modified configuration would direct beach traffic to the new northbound off-ramp at Hot Springs, bypassing the roundabout and Hermosillo Road. A new

southbound on-ramp at Cabrillo would also divert traffic away from Coast Village Road.

Nygren, David J.

Comment 3 Traffic Design

See the response to comment 2.

Nygren, David J.

Comment 4 Hermosillo Underpass

An underpass at Hermosillo Road would be very disruptive to the community as significant right-of-way would need to be acquired. Because the underpass would be below grade until well west of the railroad tracks, access to homes along Butterfly Lane would be lost.



Price Postel & Parma, LLP (Sam Zodeh)

Noise

The property at 1745 Fernald Point Lane is represented in the Noise Study Report by short-term Monitoring Station ST22 and modeling point R76. This location is about midway along the evaluated Soundwall S471. An additional modeling point was later added to reflect 1755 Fernald Point Lane. Both of these properties would benefit from construction of Soundwall S471. Caltrans staff also reevaluated high-density residential locations behind Soundwall S471 to determine whether there were short sections that might be financially reasonable. But, no further segments of Soundwall S471 were determined to be financially reasonable. Also, it was noted that a soundwall at this location would cross a Federal Emergency Management Agency-identified floodway and create higher flood flows that could not be passed through using floodgates. Soundwalls that would cross this floodway are not considered feasible and are not being recommended for construction due to the potential for exacerbating flooding upstream of the soundwall locations. Refer to Volume I, Section 2.2.7, of the final environmental document for more information on Soundwall S471.

Caltrans is the lead agency on this project for both the California Environmental Quality Act and National Environmental Policy Act. Caltrans determines the significance of environmental impacts, including noise impacts, under the California Environmental Quality Act and National Environmental Policy Act criteria of context and intensity. Caltrans uses the Federal Highway Administration guidelines to determine when noise abatement must be considered, however that is not considered a threshold of significance. Table 2.36 in Section 2.2.7 (Noise) in Volume 1 of the final environmental document shows a project build noise level increase for the project of a maximum of 2 dB above the existing noise levels for residences in Fernald Point. This minimal increase is not considered a significant impact given the fact that according to the Caltrans Technical Noise Supplement

(TeNS) a 2 dBA increase is not detectable to a healthy human ear and a 3 dBA increase is barely noticeable to a healthy human ear. Therefore, the increase is not considered a significant impact under CEQA or NEPA and no mitigation is required.

received
April 9, 2012

April 6, 2012

Mr. Matt Fowler, Senior Environmental Planner
Environmental Analysis
California Department of Transportation
50 Higuera Street
San Luis Obispo, CA 93401

Dear Mr. Fowler:

We are submitting the following comments regarding the Caltrans DEIR on the South Coast HOV Project on U.S. Highway 101.

Our comments specifically address the noise abatement mitigation requiring the construction of a noise sound wall. We have resided at 1396 Danielson Road since 1979 and welcome your proposed noise mitigation.

Our residence is adjacent to your Noise Receiver I.D. 95 and is within your severe noise receptor area. A sound wall is recommended for construction on all three of your Alternative design plans. We strongly support this proposal for a sound wall. Further, our neighbors also support the construction of a sound wall.

CALTRANS has a computer modeling prediction at R95 of 72 dB. We commissioned actual measurements in the 1980's showing peaks of up to 87 dB from truck traffic.

The one concern is that for our R95 location, CALTRANS proposes only a 10-foot sound wall (Unlabelled Table in Chapter 2). Since Seab Findley of CALTRANS worked with us in the early 1980's, CALTRANS engineers have said that a 10-foot wall is too low to block truck exhaust stack noise, and it may actually be worse to have a sound wall of inadequate height. Ten feet height has always been discussed as inadequate to block such truck exhaust stack noise. Thus, we ask that CALTRANS modify the proposed sound wall height at R95 to 14 feet. We filed letters on March 24, 1981 and again to Scott Eades on December 8, 2009 documenting CALTRANS measurements at our location of 80 dB (Letters enclosed).

Thank you very much for your assistance in this matter.

Orrin Sage
Orrin Sage and Cindy Sage
1396 Danielson Road
Santa Barbara, CA 93108
(805) 969-0557

S A G E
Associates
ENVIRONMENTAL CONSULTANTS

December 8, 2009

State of California
Department of Transportation
District 5
50 Higuera Street
San Luis Obispo, CA
93401

Attention: Mr. Scott Eades
Mr. Carl Michael

Subject: Sound Wall –US Highway 101 Improvements Between
Olive Mill and San Ysidro Roads, Montecito, CA

Dear Mr. Eades and Mr. Michael,

We visited CalTrans on November 25, 2009 to ask about the status of the freeway work in Montecito, and particularly what plans CalTrans has for a sound wall between Olive Mill Road and San Ysidro Road on the south (beach) side of the US Highway 101. We live at 1396 Danielson Road, which is at the corner of South Jameson and Danielson Roads, immediately adjacent to the Olive Mill Road on-ramp, and US 101. We have corresponded with CalTrans asking for a sound wall since 1981 (see attached).

We understand that current plans for the Draft Environmental Impact Report "project description" include a sound wall on the south side of US 101.

We support a 14', continuous noise wall at this location. Lower sound walls, say at 10'-12' will amplify the truck traffic stack noise (this from your engineers in 1981 and 1992). Discontinuous walls such as have been constructed near Milpas Street, and in Carpinteria between Santa Claus and Padaro Roads also act as noise wave guides, so are less useful at attenuating freeway noise.

S A G E
Associates
ENVIRONMENTAL CONSULTANTS

We have attached letters and correspondence from 1981 that documents that CalTrans did noise readings, and found that eighteen years ago, we met the qualifications for exterior highway noise ratings that justify a sound wall.

Since 1981, when we did our own noise readings and estimates of truck traffic, the number of truck/trailer rigs increased from about "1 per 60 seconds" in 1981, to the current level of 1 per 6 to 10 seconds. The 4 am to 6 am truck traffic on US 101 is still our most significant source of noise.

Please keep us informed, We want to review the project description and alternatives for the Draft EIR now (since it is underway, there must be such information). We also request a copy of the Draft EIR for comment, when it becomes available.

Thank you for your attention, and for helping us to stay informed.

Very sincerely,

Orrin Sage
Orrin Sage, PhD
Cindy Sage, MA *Cindy Sage*
Sage Associates, Environmental and Agricultural Consultants

STATE OF CALIFORNIA—BUSINESS AND TRANSPORTATION AGENCY

EDMUND G. BROWN JR., Governor

DEPARTMENT OF TRANSPORTATION

P.O. BOX 1, SAN LUIS OBISPO 93406
TELEPHONE: (805) 549-3111



March 24, 1981

Community Noise Program
910082-5951154

Mrs. Cindy Sage
1396 Danielson Road
Montecito, CA 93108

Dear Mrs. Sage:

Our District Lab has completed noise readings from freeway traffic in your neighborhood. The readings were taken on March 11 and 12, 1981, with the following results:

The Sage residence outside; Leg of 69 dBA and peak of 80 dBA.
At 1433 and 1403 South Jameson Lane the Leg read 68, 69 and 69.
The peak levels were 75 to 80 dBA.

These readings indicate your house and adjoining houses on Jameson Lane do qualify with an exterior highway noise rating of 67 Leg dBA or higher. This information will be filed in our district records until funds become available for additional community noise abatement. As it stands now, funds are being provided on a Statewide basis by priority. This places areas in Los Angeles and San Francisco with much higher noise levels ahead of any locations in our District (Santa Barbara to Monterey). We do not anticipate any more funds for community noise abatement in the near future.

As an alternate, you could consider some type of private fencing that would reduce the freeway noise. We agree the noise is certainly there, but at this time the funding isn't. Highway funds are needed for more critical work to improve safety and maintain bridges and pavements. I have enclosed some noise barrier fence plans for your information.

Sincerely,

John E. Dryden
John E. Dryden
Project Design Engineer

Enclosure

Sage, Orrin and Cindy (Comment Letter 1 dated April 6, 2012)

Noise

As a result of comments received, Caltrans staff has reevaluated soundwalls for high-density development areas to identify sections of soundwalls that might be financially reasonable. As a result, an extension to the north of Soundwall S519 to Olive Mill Road is expected to be recommended for construction. A 14-foot-tall wall would have been required if new lanes were added to the outside of the existing lanes in this location, the new lanes will be added in the median. Therefore, the recommended height is 12 feet tall and would be tall enough to block the line of sight of traffic, including truck stacks.

The 87 dBa was a maximum measurement, and the 72 dBa is an equivalent noise level that takes the average peak hour traffic noise levels over a certain period of time. We do not use maximum measurements when calculating wall heights per Federal Highway Administration and Caltrans protocol. Without knowing the sound meter and location and existing conditions at the time the reading was taken in the 80s, Caltrans has no way to verify the validity of the 87 dBa reading taken.

See Volume I, Section 2.2.7, for more information on Soundwall S519.

Sage, Orrin and Cindy (Comment Letter 2 dated December 8, 2009)

Noise

See response to comment above.



<audubon@nain.org>

07/09/2012 10:09 PM

To: <SouthCoast101.HOV@dot.ca.gov>

cc:

Subject: Santa Barbara 101 HOV corridor EIR comments

Matt Fowler, Senior Environmental Planner

July 9, 2012

Caltrans District 5
50 Higuera Street
San Luis Obispo, CA 93401

SouthCoast101@dot.ca.gov

COMMENTS to Draft Environmental Impact Report/Environmental Assessment: South Coast HOV Lanes

Dear California State Department of Transportation, and Santa Barbara County Association of Governments:

On behalf of the [roughly] 1,200 families, who belong to our south coast chapter of the National Audubon Society, please include and respond to the following Comments for the draft EIR on the upcoming phases of 101 Widening/HOV improvement projects, in southeast Santa Barbara County:

1. Converting Los Patos Way into the main, southbound 101 exit for Cabrillo Boulevard, and the Hot Springs Road-Coast Village Road roundabout would create Significant Unavoidable Adverse Impact on the fauna and bird life at the Santa Barbara Bird Refuge.

1a. The very extensive, drawn-out construction period will generate significant noise, vibration, dust impacts, which would be highly disruptive to resident, and migrating, birds at the Refuge:

1b. The residual, 24/7 noise impacts for a major offramp immediately adjacent to a long-established community Bird Refuge would also constitute a Significant Unavoidable Cumulative Adverse Impact.

1c. The ancillary proposal conjoined to this option, to raise, rebuild, and realign, the existing railroad bed/berm and tracks adjacent to the Bird Refuge would amplify the adverse 101 impacts, significantly worsening them by prolonging construction, noise, dust, vibration, human intrusion to habitat and its buffers.

2. Because certain resident, and migratory, bird species could be adversely impacted by a major Los Patos Way/101 ramp-interchange project option, standard findings of "Overriding Consideration" Caltrans may dependent on demonstrating that resident, and migratory, birds are not already under state and federal legal protection. Which agencies have final determination to override identified impacts, and which species might be impacted, should be stated more clearly in the Final EIR.

1

3. Caltrans HOV-widening project could permanently remove and/or dramatically reduce existing 101 corridor landscaping, and either not replace it, or to replace a significant portion with concrete "noise" walls, and/or un-landscaped concrete median collision barriers. Such an outcome could, potentially, result in cumulative Significant adverse impact to existing fauna and avian habitat, which could be difficult to effectively mitigate or offset.

2

3a. Proposed mitigation language attendant to such cumulative habitat reduction/loss is inadequate, relative to the adverse impacts anticipated, and should be more specifically addressed, including a wider range of options.

3b. Offsets to expand existing habitat too far removed from the 101 widening project impact zone, could be problematic, because they would not fully compensate for the significant, cumulative ecological damage anticipated; and because it's hard to assure which resident and migratory species now using current habitat for nesting or forage could readily relocate. We hope the Final EIR offers more, and more specific, information on this project risk.

3

4. Because visibility, line-of-sight, and accident history on the existing left-lane southbound off-ramp remain either "good" or "generally acceptable" when compared to other Caltrans interchanges, we expect the Final EIR to more clearly explain why Caltrans "preference" for a right-lane exit may not be made an "exception" in this case, as the Transportation Commission and/or Caltrans have done with other projects in the past?

4

5. We remain concerned that the "competing priorities" between Caltrans and the City of Carpinteria [i.e. to extend a regional/municipal "connecting bike-lane segment"] proximate to the 101 widening/improvement projects in the Carpinteria Valley, could result in unnecessary intrusion, and a variety of significant adverse impacts to, the Carpinteria Salt Marsh. How Caltrans proposes to protect the Marsh ecosystem should be more clearly defined in the Final EIR for that project.

5

On behalf of our 1,200 member families, thank you for considering our Comments on the draft EIR, which we intend to share with: the City of Santa Barbara, the Santa Barbara County Board of Supervisors, and the California Coastal Commission, as well as the CA Fish & Game Commission, and the regional office of the U.S. Fish & Wildlife Service.

Please keep us informed about your Response to Comments, and about future decision milestones on this project.

Remaining, yours most sincerely,

Lee Moldaver, Vice-President,
Santa Barbara Audubon Society

5679 Hollister Avenue, Suite 5 B
Goleta, CA., 93117

805.964.1468

Attachments: untitled-[3.2] 27 k [text/html] Download | View

Thank You,

Lawrence Ayres
3375 Foothill Rd #1022
Carpinteria, CA 93013

—Certified Virus Free by 4SecureMail.com ICSA-Certified Scanner—

Santa Barbara Audubon Society

Comment 1 Biology and Design

The preferred alternative in combination with the F Modified configuration avoids impacts to the Andree Clark Bird Refuge for several reasons. The interchange configuration does not install an on-ramp at Los Patos Way and closes the existing off-ramp. The F Modified configuration does not involve any work on the railroad grade, which would have moved construction activities closer to the bird refuge.

Santa Barbara Audubon Society

Comment 2 Biology

Refer to the response for comment 1 and 3.

Santa Barbara Audubon Society

Comment 3 Habitat

Because the proposed roadwork will add the HOV lanes to the highway median along much of the route, existing landscaping along highway shoulders would be preserved in many areas. The project includes the following avoidance and minimization measures:

- Existing trees and shrubs will be preserved to the greatest extent possible.
- All oaks and other native trees greater than 6 inches in diameter at breast height to remain in the project vicinity will be delineated on design plans. Prior to any ground-disturbing activities, environmentally sensitive area fencing would be installed around the drip line of trees to be protected.
- Any native trees removed as part of the project will be replaced at a ratio of 3:1.

- Existing healthy palm trees that would be affected by the project would be transplanted to other areas within the project where feasible. In addition, a tree retention plan will be developed in the Plans, Specifications and Estimate phase of the project. This plan will be included along with formal planting plans in applications for various Coastal Development Permits.

The addition of soundwalls and retaining walls will result in the removal of existing highway landscaping at several locations. Project minimization measures state that planting will be included with all soundwalls and retaining walls to the greatest extent possible. New landscaping is proposed along the length of the project. Many of the locations where soundwalls are proposed consist of landscaping dominated by non-native species, in particular *Myoporum laetum*, *Acacia longifolia*, and *Carpobrotus edulis*. Draft conceptual plans include widespread planting along the State right-of-way with a palette of mostly native trees and shrubs, including coast live oak, sycamores cottonwoods, willow, maple, alder, cypress and elderberry. Tree planting is proposed with soundwalls wherever feasible, with native species replacing non-natives that are currently present. At these locations, stands of native trees are proposed close to new soundwalls. In some areas, trees would fill existing gaps in right-of-way vegetation or would enhance existing highway roadside planting, introducing native tree species to these areas. In areas where space precludes planting trees, native shrubs will be planted wherever possible. Native shrub plantings where ocean views are not compromised will focus on large growing species such as Toyon, Catalina Cherry, and Sumac to maximize vegetative mass and habitat potential.

Additionally, approximately four years ago a landscape rehabilitation project planted over 500 trees within the southern half of the project limits. This planting is maturing and already contributing an increasing amount of tree canopy in the corridor. These trees and associated shrubs were not planted as mitigation. This maturing vegetation in combination with proposed planting as

part of the HOV Lanes project will provide an overall increase in biomass within the project limits.

Planting areas with mostly native species will improve the quality of habitat for native fauna that use the State right-of-way. The project proposes replacement of live oak trees within the State right-of-way at a ratio of 3:1, adding native tree species to areas currently dominated by non-native shrubs and plants. Alternative 1 (the preferred alternative) and Alternative 2 propose median planting along much of the project area. Much of the median landscaping to be removed would be considered low-quality habitat for nesting birds due to its immediate proximity to high levels of freeway traffic and noise. Creek corridors represent some of the higher quality habitat in this portion of the highway corridor, and Caltrans will plant all temporarily disturbed riparian areas with riparian trees and native understory. Trees not within the area of direct impact will be protected with environmentally sensitive area fencing and retained.

At the Cabrillo Interchange, a row of eucalyptus will be removed along southbound lanes to accommodate new southbound ramps. A second row of eucalyptus in the railroad corridor behind the trees in the State right-of-way will be retained. While new landscape planting, including trees, is planned at the Cabrillo Interchange, space at the site is limited so additional tree planting will occur in nearby locations on the State right-of-way and at the San Ysidro and Olive Mill Interchange. In addition to highway plantings, many frontage roads along the highway corridor support mature landscaping that provides additional potential habitat for resident and migrant species in the immediate area. Many existing skyline trees and other mature vegetation in this corridor, including eucalyptus along Padaro Lane and Butterfly Lane, and mature riparian trees at creek corridors, are outside the highway right-of-way and will remain as habitat for nesting birds.

Santa Barbara Audubon Society

Comment 4 Traffic

Visibility, line-of-sight, and accident history on the existing left-lane southbound off-ramp are not “good” or “generally acceptable” based on other similar Caltrans interchange ramps or based on engineering standards. This ramp has inadequate stopping sight distance (visibility), which requires deceleration of exiting traffic in the fast lane prior to the ramp. Vehicles entering the ramp without this early deceleration, coupled with the diminished stopping sight distance, are contributory to the accident rates associated with the ramp. The three-year accident history used for project evaluation (October 1, 2006 to September 30, 2009) at this ramp is 1.5 accidents per million vehicle miles, while similar ramps statewide have a rate of 1.0. This equates to 50% more accidents than equivalent ramps.

The design exception process is project specific. Any non-standard feature being evaluated would need to consider the context of the specifically proposed project. A non-standard feature evaluated for retention with a small, operational improvement project would not necessarily have the same evaluation outcome as that for a much larger, capacity-increasing project.

An operational project needs to consider improving operations of existing traffic loading. A capacity-increasing project needs to accommodate anticipated traffic loading 20 years in the future. Evaluations include looking at project-specific three-year accident histories and considering the magnitude of the specific project cost relative to the cost to correct the non-standard feature.

Refer to Volume II, Appendix J for discussion of left-side ramps. This fact sheet was added to the final environmental document. Also refer to Volume I, Section 1.3.6, for Alternatives Considered but Eliminated from Further Discussion.

Santa Barbara Audubon Society

Comment 5 Biology

While the bike path is not part of the Caltrans project plans for the South Coast 101 HOV Lanes project, the City of Carpinteria has expressed interest in the extension of a regional/municipal connecting bike lane segment as a condition of the Local Coastal Permit. The Carpinteria Local Coastal Plan Policy OSC-3c states that development adjacent to the required buffer around wetlands should not result in adverse impacts to wetlands.

Linked with the South Coast 101 HOV Lanes project as part of the Local Coastal Amendment process (City of Carpinteria and County of Santa Barbara) is a coordinated effort led by the Santa Barbara County Association of Governments (the applicant) and the City of Carpinteria to build two trails deemed necessary as part of the local coastal amendment process. The two trails are as follows: the Santa Claus Lane Class I Bike Path is linked with the South Coast 101 HOV Lanes project, and the Rincon Coastal Trail is linked with the Linden Avenue and Casitas Interchange project. This is newer information not included in the draft environmental document. The information was updated to Section 2.1.5 of the final environmental document. Each of these paths would fill critical gaps in the overall trail system.



Christin Boyd
<browndog11@gmail.com>

07/02/2012 09:30 AM

Please respond to
<browndog11@gmail.com>

To: <scott@ades@dot.ca.gov>

cc

Subject: Caltrans Widening 101 Concerns in re: Santa Claus Lane

Dear Scott,

As business owners on Santa Claus Lane, we realize that Santa Claus Lane is a unique and special business district in Santa Barbara county. While we enjoy the benefits of being within walking distance to one of the county's most populated and beautiful beaches, there are restrictions that our business community faces by being in such close proximity to Highway 101 and the crowds that frequent Santa Claus Beach. We support and applaud CalTrans for their plans for widening Highway 101 from 2 lanes to 3 lanes in each direction, however, we do have strong concerns about the implementation of said plans and how it will affect the businesses along our stretch of the freeway.

The item of primary concern is the retaining wall that could be built if the lane expansion is done laterally rather than within the median strip. Our group strongly supports the plan that would expand the lanes into the existing median strip rather than the lateral plan for the following reason; while CalTrans is moving forward on the Highway 101 lane expansion, concurrently, Santa Barbara County is making the renovation of Santa Claus Lane a priority and the two agencies optimally should be working hand in hand to create the best plan for businesses, locals and tourists. If the CalTrans lateral plan is chosen, with the retaining wall placed on the south side of the Padaro/Santa Claus Lane length of the freeway, Santa Barbara County will not be able to create the proposed diagonal parking on the north side of Santa Claus Lane that is currently planned in the county's upgrade. As anyone who has been on Santa Claus Lane in the past 5 years during the summer daytime hours knows, parking is already very much at a premium with the substandard parking that currently exists. To remove the ability to park on the north side on Santa Claus Lane would be suicidal for our business community as not only would no new parking be created but we would lose much of what little parking there is now. Our association is in unanimous agreement that the widening must be done without the potential for parking loss.

Another concern for our businesses would be noise and dust control during the construction phase of the widening, whether it be the lateral or the median approach. As

there are multiple restaurants and eateries currently operating with outdoor seating amenities, the mitigation of the construction noise and the dirt/dust created in the widening will be crucial to those businesses as well as the other merchants along the construction zone.

We would also like to formally request that all landscaping in this area be thoughtful of maintaining motorists visibility of our business community and the surrounding ocean/beaches. Our patrons often remark on the astounding ocean views that are visible from 101 and the unique proximity of our businesses to such a vista. This is a strong reason for the success of our businesses and needs to be addressed with appropriate low level plantings rather than taller trees that would obstruct the view of the businesses and ocean.

As this seems to be a time of planning and change, we would also like to voice our strong support for a bike lane similar to the Ortega Hill bike lane that would connect the eastern end of Santa Claus Lane to the western end of Carpinteria Avenue. We know that this proposal has been suggested in the past and we would like to encourage its implementation in this time of flux. The connection of Santa Claus Lane to Carpinteria has been on the wish list for the community and city government for many years.

Thank you for your consideration,

Santa Claus Lane Business Association

ZE BIRD
HUMMINGBIRD
PORCH
RADIS ELECTRIC
PADARO SHADES
REED INTERIORS
HAWTHORN
THE GARDEN MARKET
THE BARBEQUE COMPANY
A FRAME SURF SHOP
RINCON BEACH CLUB
PADARO BEACH GRILL
LINKED
PAUL FRANZ CONSTRUCTION
THE STUDIO AT PADARO
SALT

porch
3823 Santa Claus Lane
Carpinteria, CA 93013
805.684.0300

info@porchsb.com

Santa Claus Lane Business Association (submitted by C. Boyd)

Comment 1 Alternative Design Consistency with Santa Claus Lane Parking Plan

Since the public meeting and release of the draft environmental document, potential conflicts between the South Coast 101 HOV Lanes project and the Santa Claus Lane proposal came to light and were discussed by Caltrans and the County. As a result, the design was modified for the preferred alternative (Alternative 1). Previously, this alternative called for widening to the outside in the location next to Santa Claus Lane, which would have necessitated a retaining wall; now, the widening will occur toward the median in this area. A retaining wall will not be required.

Santa Claus Lane Business Association

Comment 2 Noise and Dust Control During Construction

There is no way to entirely avoid noise impacts during construction, but Caltrans' standard contract specifications pertaining to construction noise would be implemented. These include actions such as limiting work hours, using mufflers, and developing a public outreach plan that includes keeping the public notified of the construction schedule and providing contact information for complaints. While there would be temporary increases in fugitive particulate matter as a result of soil disturbance and demolition activity, air quality impacts associated with project construction would be minimized by incorporating Caltrans Standard Specifications that reduce and control dust. The standard specifications also reduce oxides of nitrogen emissions from construction equipment (see Section 2.4 of the final environmental document).

Santa Claus Lane Business Association

Comment 3 Landscaping

Landscaping proposals for the project will be finalized during the design phase. The planting schemes will vary depending on what is appropriate in the

various areas along the project. The context is important to consider because there are areas where screening is important and other areas where there is a need to protect views. All landscaping and aesthetic design elements would be developed in collaboration with representatives of each affected community.

Santa Claus Lane Business Association

Comment 4 Request for a Bike Lane

Separate from the South Coast 101 HOV Lanes project is a coordinated effort led by the Santa Barbara County Association of Governments (the applicant) and the City of Carpinteria to build two trails deemed necessary as part of the local coastal amendment process. The two trails are as follows: the Santa Claus Lane Class I Bike Path is linked with the South Coast 101 HOV Lanes project, and the Rincon Coastal Trail is linked with the Linden Avenue and Casitas Interchange project. This is newer information not included in the draft environmental document. The information was updated to Section 2.1.5 of the final environmental document. Each of these paths would fill critical gaps in the overall trail system.

Save Our Village
c/o 180 Hermosillo
Santa Barbara, CA 93108

July 5, 2012

Matt Fowler, Senior Environmental Planner
Environmental Analysis
California Department of Transportation
50 Higuera Street
San Luis Obispo, CA 93401

SUBMITTED VIA EMAIL

RE: Comments to the 101 HOV Project Draft EIR

Dear Mr. Fowler,

CREDENTIALS: Save our Village (SOV) is a grassroots group of nearly 200 homeowners residing closest to the proposed Cabrillo Interchange, affording us special expertise and knowledge of the area. As the residents nearest to the proposed interchange project we have personal knowledge and observations of existing conditions, particularly in the Hermosillo and Coast Village Road area. The proposed project directly affects the area of the SOV neighborhoods.

We have studied this project since November, 2010 with two consistent goals:

- 1) To reject any plan that includes Hermosillo as the primary northbound beach exit
- 2) To encourage the development of an interchange plan that precludes Hermosillo as the sole northbound beach exit.

(Note: In their 6/5/12 letter you and to the Montecito Planning Commission (cc Rachael Falsetti), the Montecito Association in the last paragraph indicates they too do not support using Hermosillo as the sole primary northbound beach off-ramp. Letter Text as follows:

Extract: Montecito Association Letter to Matt Fowler, 6.7.12) *"We do not support an option that would rely solely on Hermosillo Road as the primary northbound exit in the Cabrillo/Hot Springs area. This would result in the addition of unacceptable levels of traffic on Coast Village Road and would likely adversely affect the residential neighborhood to the north."*

We hope the comments of SOV will help focus on, and narrow, the alternatives to the one that provides the best overall configuration and least overall environmental impact and harm, while best meeting the objectives of the project.

TAXPAYER APPRECIATION: Generally will limit our comments to the DEIR, directed specifically to the environmental effects and to Caltrans' specific request to address public preferences for Interchange Alternatives. However, public accessibility and understanding of the DEIR is a critical component of the environmental review, so

2

before providing our more specific project comments we would like to express our public appreciation for the Caltrans District Five 101 HOV Project team—and call out by name project leader, Scott Eades. The entire team has been extraordinarily helpful—they have listened to our concerns, they patiently assisted with our education and they have always remained accessible and respectful. We found the information to be extremely well-written and thorough, especially the comprehensive underlying documentation available at our library, to which many citizens availed themselves. Many of us have dealt with Caltrans projects in the past, but we believe this team has gone beyond the norm in their professionalism, expertise and patience. Caltrans and the taxpayers should be very pleased with the South Coast 101 HOV Project Team's presentation, product and effort.

SOV's COMMENTS TO THE DEIR: Please accept the following comments to the DEIR:

SOV believes F-Modified carries the least overall impacts of all the options and alternatives that were studied, discussed in public meetings, and deemed feasible. SOV believes F-Modified should be chosen as the "superior alternative." F-Modified is reasonable, feasible, and can substantially decrease certain significant impacts, including, but not limited to, aesthetics, land use, noise, transportation, biology recreation.

Option F Modified most closely retains existing circulation patterns. It also retains equivalent choices for drivers to reach their selected destinations. For example, it is logical that Montecito residents want direct access to their neighborhoods (as they have now) and that visitors to Cabrillo beach, parks and hotels would want direct and clear access to that important, regional, beach coastal recreation area

Option F Modified avoids reconfiguration of the Los Patos railroad bridge, which is a major challenge to the viability of several of the other options and a potential major visual/aesthetic and biological impact.

All of the other options (F, M, M-Modified, J) would result in greater impacts at the neighborhood/community level, causing permanent destruction/impact to the land use character as well as long-term degradation to mobility in adjoining neighborhoods." SOV further questions the feasibility of the new alternative requested by the Montecito Association, particularly because of the additional non-local traffic that would be forced to go through the round-about and it would create the need to for Caltrans to purchase out-of-right-of-way private property.

Other options would unnecessarily cause severe irreversible impacts to coastal resources. F-Modified would not.

Project/Community Goal Consistency:

F-Modified has the best potential to achieve consistency with regional, sub-regional and community goals, which would cause least impacts to land use. Caltrans' guiding principles for this project, which also reflect the conclusions of 101 In Motion, include:

- Project design is to be compatible with existing community character while addressing user and maintenance worker safety.
- Protection and mitigation of visual/aesthetic and coastal resources are to be preserved and/or mitigated to the greatest extent feasible.

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- All feasible avoidance of historical and cultural resource impacts or mitigation to the greatest extent feasible.

Land Use and Aesthetic/Visual Impacts:

Coast Village Road is a primary access to the Hermosillo/CVR local area. CVR is also a local commercial destination with an established “village feel.” It is key to community character for both Montecito and the City of Santa Barbara to maintain this small scale pedestrian feel and avoid the long-term and permanent intensification that would result if Hermosillo was the only available off-ramp, not only for community access but also to for all travelers, including those who currently use the existing left side off-ramp to Cabrillo Blvd. Such intensification would transform Coast Village Road into a highway frontage road thoroughfare and permanently change the land use and aesthetic character of this special area. F and J options both result in these major impacts. F-Mod would minimize them.

Noise:

Long established residential neighborhoods are located in close proximity to 101 and the Hermosillo exit. Options F and J, that would result in additional trips diverted to this area, would substantially increase the noise, night lighting and glare associated with these additional trips, buses and hotel/business delivery trucks.

Recreation:

Option F-Modified retains a dedicated and direct access to Cabrillo Blvd. and East Beach, a major, regional, coastal recreational area used by tourists, beach and ocean-goers. The area is defined not only by its beaches, harbor, and fishing pier, but also by the Andre Clark Bird refuge, local zoo, and visitor-serving uses. The design for Option F-Modified removes the existing problematic 101 left-hand lane off-ramp specifically built for access to Cabrillo Blvd. for travelers driving up from the south. It replaces it with a more traditional right hand lane exit that sends the traffic going to that destination area from the south, directly to the Cabrillo Blvd. undercrossing, north of the Hermosillo exit. It also provides for new direct-to-Cabrillo off and on ramps for travelers coming from the north or leaving to the south.

Option F-Modified maintains access to Cabrillo Blvd. and East Beach coastal recreational areas, equivalent to the existing level of access. Options F and J remove direct access to this area and therefore conflict with a main goal of the Coastal Act. Coastal Act policies, such as Policies 30211, 30212.5, and 30252 address this as follows:

“ 30211. Development shall not interfere with the public’s right of access to the sea...”

“ 30212.5 Wherever appropriate and feasible, public-facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area.”

“30252 Maintenance and enhancement of public access: The location and amount of new development should maintain and enhance public access to the coast ...”

4

It is clear that the Coastal Act intends to maximize and facilitate access to coastal resources.

Biology: Coastal wetlands:

"Options J, M, and M-Modified rely on new south-bound on and off ramp locations for southbound travelers that are located in the Los Patos vicinity as an alternative to Cabrillo Blvd. These options, however, present Coastal Act consistency challenges. Construction of interchanges at Los Patos would encroach into the Coastal Act protected wetland area surrounding the Andre Clark Bird Refuge. This would conflict with Coastal Act protection policies, such as policies 30233 and 30240, as follows:

"Section 30233 Diking, filling or dredging; continued movement of sediment and nutrients: "...filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative and where feasible mitigation measures have been provided..."

"Section 30240 Environmentally sensitive habitat areas; adjacent developments: ... (a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.

Fire:

"The Montecito area is in a High Fire Hazard Area and is a wildland interface area. County Fire Station 2 and the City Fire Station near Cabrillo are in the vicinity of the area near the Hermosillo exit. Eliminating any Cabrillo exit as in Options F and J, would direct substantial additional through-traffic to the Hermosillo off-ramp, through nearby intersections and through Coast Village Road. This would impair the ability of firefighters to adequately respond to structural fires, wild land fire events, and would impair any necessary emergency evacuation of the area."

Circulation and Transportation:

"Of all the options, Option F-Modified provides the best overall circulation flow for the highway traveler. It also maintains the current traffic patterns for the western portion of Montecito. The Montecito Community Plan and County Circulation Element establish an overall maximum of Level of Service B for the Montecito Area. Currently, Olive Mill and other vicinity surface streets meet that standard. The DEIR indicates that under Options F and J, which eliminates any dedicated northbound Cabrillo off-ramp, will cause the traffic at the Hermosillo exit to exceed their standards. This additional traffic would threaten acceptable service levels for that portion of Montecito."

Additional Mitigation Measure: Restart a Design Review Team

SOV also recognizes any final option will require important refinements and mitigations as the EIR is finalized and the design is fully developed. As a critical aesthetic and land use mitigation measure, SOV suggests restarting the Design Review Team (DRT) and

5

multi-agency coordination as final project designs are further developed (35% and final plans).

Mitigations, specifics of mitigation monitoring, specific plans for landscaping and vegetation restoration, and detailed construction phasing and scheduling needs to be included in the document

Summary: F-Modified would:

- Create the least overall impacts and cause the least overall change in the Hermosillo neighborhoods and Coast Village Road commercial area.
- Maintain current travel patterns
- Include the best direct coastal access
- Avoid impacts to Andree Clark Bird Refuge
- Avoid high cost railroad work
- Mitigations of significant visual impacts should include the restart of DRT

Sincerely,



(SOV Steering Committee Contacts: J Amy Brown, Martha Siegel)
c/o 180 Hermosillo
Santa Barbara CA 93108
(805) 969-5515

April 30, 2012

Montecito Planning Commission
County Planning Commission
123 E Anapamu Street
Santa Barbara, CA 93101

Dear Commissioners:

Subject: South Coast 101 High Occupancy (HOV) Lanes

The Save Our Village study group appreciates the opportunity to provide the Montecito and County Planning Commissions with written comments concerning the Draft EIR (DEIR) for the HOV Lane project extending from the City of Carpinteria in the south to Cabrillo Boulevard in the north. These comments represent consensus reached in meetings and discussions by a large group of neighbors immediately and directly affected by this project in the northern end of Montecito.

Save Our Village would prefer that no increase in freeway usage or structural changes take place at all. However, they also recognize that there are deficiencies along this stretch of 101 and that this project implements a key piece of the overall solution reached by the 101 In Motion effort, a multi-year, inter-agency, group of professionals and stakeholders. Caltrans' guiding principles for this project, which also reflect the conclusions of 101 In Motion, state that:

- Project design is to be compatible with existing community character while addressing user and maintenance worker safety.
- Visual and coastal resources are to be preserved and/or mitigated to the greatest extent feasible.
- Adverse impacts to historical and cultural resources are to be avoided or mitigated to the greatest extent feasible.
- Acquisition of private property is to be minimized.
- Financial viability is a key constraint; alternatives under consideration should be feasible within the anticipated long term funding stream for the project.
- Opportunities for stakeholder and public input and involvement will be provided throughout the project development process.

Therefore the Save Our Village approach has been to study the broad array of potential and feasible solutions already identified in extensive discussions by agencies, professionals and the communities. The focus has been to narrow the selection to the option that best provides overall design and protections for the affected region, the Montecito community, and most directly for the specific neighborhoods on the northern (western) end of Montecito, while best meeting the objectives and goals of the project. Any selected option will need fine tuning and further design work in order to assure the best possible project for our area. Save Our Village looks forward to working with Caltrans, the County, and other jurisdictions on this. Understanding this premise, individuals in this area may also be submitting additional comments to Caltrans by May 25th on specific impact details, mitigation, and monitoring plans, some of which have already been identified for you by the Montecito Association.

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PLANNING & DEVELOPMENT
HEARING SUPPORT

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Option F-Modified: In summary, Save Our Village supports Option F-Modified as the superior alternative. It is reasonable, feasible, and can substantially decrease certain significant impacts, including, but not limited to, aesthetics, land use, noise, transportation, biology recreation. Moreover, Alternative F Modified has the potential to best achieve consistency with regional, sub-regional and community goals.

1. General Comments on Options:

As compared to the other options in the DEIR, Option F Modified most closely retains existing circulation patterns and highway traveler choice for off-ramp destinations, such as logical and direct access to neighborhoods and to the Cabrillo coastline recreational area. Option F Modified avoids reconfiguration of the railroad bridge, which is a major challenge to the viability of several of the other options and a potential major visual impact. Additionally, all of the other options will result in long-term degradation to mobility in adjoining neighborhoods and unnecessary impacts to coastal resources.

2. Aesthetics, Land Use, Community Character and Noise:

a. Coast Village Road serves as primary access to the northern Montecito neighborhoods, as well as a local commercial destination with a "village feel." It is key to community character for both Montecito and the City of Santa Barbara to maintain this small scale pedestrian feel and avoid the long-term and permanent intensification that would result if Hermosillo was the only available off-ramp for all travelers, including those who currently use the existing left side off-ramp to Cabrillo Blvd. Such intensification would transform Coast Village Road into a highway frontage road thoroughfare and permanently change the character of this special area.

Although no option eliminates all adverse impacts of the HOV project on existing character and aesthetics, Option F-Modified would minimize this effect. Maintaining the existing Hermosillo off-ramp and relocating, not eliminating, the existing dedicated off-ramp directly to the Cabrillo beach and recreation area avoids over concentration and avoids the increase in urbanization that would result from funneling all of these trips on to a single local road.

b. Noise sensitive residential uses pre-exist in close proximity to 101 and the Hermosillo off-ramp. Options that would result in additional trips diverted to this area, would substantially increase the noise, night lighting and glare associated with these additional trips.

c. Aesthetics, land use and community character impacts can be substantially reduced, and the specific project design can be made more successful by the involvement of a designated community design team, charged with project design oversight and inter-agency collaboration. This is a critical component for minimizing the structural and landscaping impacts that would result from any of the options.

3. Coastal Resources:

Option F-Modified retains a dedicated and direct access to Cabrillo Blvd. and East Beach, a major coastal recreational area, heavily used by a broad spectrum of beach-goers, recreational

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enthusiasts, and visitors on holiday. The area is defined not only by its beaches, harbor, and fishing pier, but also by the Andre Clark Bird refuge, local zoo, and visitor-serving uses. The design for Option F-Modified removes the existing problematic 101 left-hand lane off-ramp specifically built for access to Cabrillo Blvd. for travelers driving up from the south. It replaces it with a more standard right hand lane exit that sends the traffic going to that destination area from the south, directly to the Cabrillo Blvd. undercrossing, north of the Hermosillo exit. It also provides for new direct-to-Cabrillo off and on ramps for travelers coming from the north or leaving to the south.

- a. Coastal access: Option F-Modified maintains access to Cabrillo Blvd. and East Beach coastal recreational areas, equivalent to the existing level of access. Options F and J remove direct access to this area and therefore conflict with a main goal of the Coastal Act. Coastal Act policies, such as Policies 30211, 30212.5, and 30252 address this as follows:

“30211. Development shall not interfere with the public’s right of access to the sea...”

“30212.5 Wherever appropriate and feasible, public-facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area.”

“30252 Maintenance and enhancement of public access: The location and amount of new development should maintain and enhance public access to the coast ...”

It is clear that the Coastal Act intends on maximizing and facilitating access to coastal resources. F-Modified maintains the current level of access, whereas options that eliminate the Cabrillo Blvd. 101 exit and provide no equivalent or improved access to this important local and regional recreational area do not.

- b. Coastal wetlands: Options J, M, and M-Modified rely on new on and off ramp locations for southbound travelers that are located in the Los Patos vicinity as an alternative to Cabrillo Blvd. These options, however, also present Coastal Act consistency challenges. Construction of interchanges at Los Patos would encroach into the Coastal Act protected wetland area surrounding the Andre Clark Bird Refuge. This would conflict with Coastal Act protection policies, such as policies 30233 and 30240, as follows:

“Section 30233 Diking, filling or dredging; continued movement of sediment and nutrients: ...filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided...”

“Section 30240 Environmentally sensitive habitat areas; adjacent developments: ...
(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas. ”

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4. Fire:

The Montecito area is in a High Fire Hazard Area and is a wildfire interface area. County Fire Station 2 and the City Fire Station near Cabrillo are in the vicinity of the area near the Hermosillo exit. Eliminating any Cabrillo exit as in Options F and J, would direct substantial additional through-traffic to the Hermosillo off-ramp, through nearby intersections and through Coast Village Road. This would impair the ability of firefighters to adequately respond to structural fires, wild land fire events, and would impair any necessary emergency evacuation of the area.

5. Circulation and Transportation:

Option F-Modified provides the best overall circulation flow for the highway traveler. It also maintains the current traffic patterns for the northern (western) portion of Montecito. The Montecito Community Plan and County Circulation Element establish an overall maximum of Level of Service B for the Montecito Area. Currently, Olive Mill and other vicinity surface streets meet that standard. The DEIR indicates that under Options F and J, which eliminates any dedicated northbound Cabrillo off-ramp, will cause the traffic from the Hermosillo exit to exceed their standards. This additional traffic would threaten acceptable service levels for that portion of Montecito.

Again, thank you for the opportunity to comment. Choosing a highway configuration that best balances the needs of the affected communities and the public it serves and that meets local and regional goals is vital to the success of the overall project. While areas of the DEIR would benefit from the inclusion of additional information, such as a complete understanding of the efficacy of the mitigations and how those mitigations and construction will be monitored (e.g., best practices, construction staging, vegetation replacement, design review). Save Our Village comments at this time focus on the overall “big picture.” F-Modified represents the best configuration to meet these needs and with the least overall impact to the area. Save the Village neighbors appreciate your consideration of these points and look forward to the continuing discussion of this important project.

Sincerely,


June Pujo
Pujo & Associates
(805) 962-3578 (Office)
(805) 637-7385 (Cell)
www.pujo.net

Received 2 comment letters from representatives of Save Our Village

Save Our Village - Pujo, Jean (Pujo and Associates) - Comment Letter 1

Comment 1 Preference for Configuration F Modified

The F Modified configuration proposes a southbound on-ramp at Cabrillo Boulevard, which will remove some southbound traffic on Coast Village Road.

Once the project is in the design phase and the Coastal Development Permit process is initiated with local jurisdictions, there will be opportunities for local involvement to help refine planting plans and design details. Much of this input will likely occur through a Design Review Team which will be made up of representatives appointed by the City and/or County of Santa Barbara.

Save Our Village - Pujo, Jean (Pujo and Associates) - Comment Letter 1

Comment 2 Aesthetics, Land Use, Community Character and Noise

Based on the public comments received after the review of the draft environmental document, the Project Development Team recommends that Caltrans select the F Modified configuration for the Cabrillo Boulevard/Hot Springs Road Interchange. Reasons for this recommendation include those identified by your organization.

Save Our Village - Pujo, Jean (Pujo and Associates) - Comment Letter 2 (Sent to Montecito Planning Commission)

Comment 1 Preference for Configuration F Modified

See response to comments 1 and 2 above.

SUMMERLAND CITIZENS ASSOCIATION
P.O. BOX 508
SUMMERLAND, CA 93067

June 1, 2012

Matt Fowler, Senior Environmental Planner
Environmental Analysis
California Department of Transportation
50 Higuera Street
San Luis Obispo, CA 93401

RE: Comments from the Summerland Citizens Association on DEIR/EA South Coast
101 HOV Lanes Project (sent via e-mail to South.Coast.101.HOV@dot.ca.gov)

Dear Matt:

Please include the following comments and concerns in the environmental review of the proposed widening project. Although most of these have been raised over the last few years at various meetings with Caltrans, and some may be addressed by the project design, we feel it is important that you hear from us again.

- Surface the Summerland section of freeway with the quietest, least noise producing, most effective and up to date pavement. Consider other appropriate forms of sound mitigation, such as low-growing plants that might have a buffering effect, but not sound walls that impact views and community character. The one exception for acceptable sound wall installation is the area adjacent to the Summerland by the Sea Mobile Home Park. Our understanding is that, upon completion of this project, there will be no noticeable reduction in the level of traffic noise we presently experience in Summerland, which is very high. | 1
- Substantially improve the aesthetics of the Evans Avenue southbound off ramp buttressing as well as the sides and underside of the Evans undercrossing. This is the main entrance into Summerland and the gateway to our community. The HOV project can increase and improve existing coastal access to the Lookout Park recreation area and facilities through the redesigning of the sloped buttresses under the Evans 101 bridge. Vertical abutments would greatly widen the surface beneath 101, increase parking opportunities (perhaps by allowing for angled parking on either side of Evans Avenue) and improve pedestrian and bicycle access to and from the beach. Vertical supports would provide the best opportunity to enhance the appearance of this key area, and would be appropriate for the placement of the town's historical mural. Consider installing attractive, well-designed lighting in keeping with the community's character. The chain link fencing here is an eyesore. Use Summerland appropriate decorative detailing when designing these details and other local highway features. The new Cacique Street undercrossing is an example of a far superior design to the present Evans Avenue undercrossing. | 2
- Dress up Padaro Lane overcrossing in a manner consistent with this being the eastern gateway to Summerland. | 3

- Limit landscaping to local natives that do not obstruct views, but appropriately soften the appearance of the highway to the maximum extent possible. Remove arrundo and other invasive plant species. Remove non-native plant species along 101 at the crest of Ortega Hill and along the southbound Summerland exit. | 4
- Protect ocean/mountain views for both the community and commuters. These include views of the Channel Islands and coastline toward Fernald Point at the Sheffield Drive interchange. Limit median and shoulder landscaping in front of Summerland and in the vicinity of Sheffield Drive to low growing natives that allow shoreline and white water views over them. | 5
- Install only dark sky qualifying lights, and a minimum of them, that do not project beyond the freeway. | 6
- Extend the southbound off ramp west up Ortega Hill at least to the hill's crest so that Summerland traffic can slow down sooner, exit more safely from 101 and save gas and brakes when entering Summerland. | 7
- Install one or two pedestrian crossings to help reconnect the community of Summerland with our shoreline and recreational area. A crossing will help mitigate the negative impact of 101 and the HOV project on Summerland. If centrally located in the community, it will reduce the demand for parking on the south side of 101. During the life of the project, parking will continue to be lost as Summerland's bluffs erode and Summerland Beach steadily migrates inland toward the railroad tracks and 101. | 8

By and large the concerns of Summerland have to do with the adverse impacts of 101 on this community's character and on the people who live and work here. Perhaps no coastal community along 101 has suffered to the extent Summerland has from this inescapable, huge source of noise, air and aesthetic pollution. For your team to fairly evaluate that you must know more about Summerland, what we have lost to the highway cleaving through our town, what we fear, and what our hopes are. Perhaps the following will help. | 9

The Character of Summerland

Summerland's character is a product of Summerland's location and the events and surviving elements of its past. To better understand these and Summerland, it helps to think of this character as having three aspects: natural, historical, and cultural.

SUMMERLAND'S NATURAL CHARACTER: Summerland's defining natural attribute is its south facing, bluff top location next to the Pacific Ocean overlooking the Santa Barbara Channel. From this setting above the beach on three steep hillsides, Summerlanders enjoy impressive mountain, coastal and ocean views. This exposes the seaside community to the ocean's marine influence, at times bringing hazy and humid weather, days of persistent fog, or moderate temperatures that are comfortably cooler on hot days and warmer on cold days. Winters and springs can be especially clear and warm, when the sun, brightly reflected in the Santa Barbara Channel, arcs low over the southern horizon and distant Channel Islands.

Summerland shares its series of broad knolls with congested US Highway 101 and the busy Union Pacific railroad tracks. In no small way, the noise and pollution from both can affect the natural

ambiance here. At the same time, this stretch of 101 offers countless commuters and travelers sweeping views of the coastline, the community and the Santa Ynez Mountains behind Summerland.

Although the area is now dominated by tiers of tightly packed houses, pavement and commercialization, Summerland's natural character persists in its elevated seaside location, sandy shore and bluffs, two coastal canyons and the Pacific's influence.

HISTORICAL CHARACTER: In historic times, Summerland was first promoted as a spiritualist colony and a place for eastern folks seeking a healthful retreat. The community was subdivided into 25 feet wide by 60 feet deep lots to accommodate members' tents. This peaceful makeshift haven was soon disrupted by the discovery of oil and gas, and subsequent intense industrialization of the shoreline and narrow coastal terrace. Oil development caused a tremendous transformation of the area, substantially altering its character with widespread oil piers, beach and bluff top oil facilities, warehouses, businesses and new homes replacing old tents. For a while Summerland was a rough and ready boom town.

Before long, petroleum supplies and related fortunes faded along with most of the remaining tents, mystics and mediums, and for decades Summerland was a humble rural seaside train stop between Carpinteria and Santa Barbara: charming and rustic enough, though, for some early western movies to be filmed here.

Summerland slowly grew with little outside influence and government regulation into a kind of alternative beach-surfer-hippie town. The Yater and White Owl surf shops were a central attraction of the 1960's. But by the end of the 60's, much of the lower area of Summerland fronting the ocean had been paved over, wiped out by Highway 101. Substantial removal and rearrangement of homes, businesses and streets began years earlier with highway widening improvements, and continued later with the elevating of modern new lanes. The community was practically disconnected from its prized seashore. Few other coastal California towns have faced such blunt alteration.

For a decade, threatened by a water shortage, Summerland experienced a building moratorium. For many years prior to the moratorium, it had been difficult to get construction loans for Summerland properties. This period of little change and calm suddenly ended in mid-1980 when the Summerland Water Board began releasing water to over 130 new meters. Less than two years later came another release of about 100 meters. An extraordinary building boom began that local citizens feared would nearly double Summerland's size without the aid of effective local planning policies. As broad fields of mustard, horse pastures and acres of open space began disappearing, citizens scrambled for Santa Barbara County's attention and help. Planning meetings and workshops that followed resulted in Summerland's first community plan and strengthened development guidelines.

No historic period since has notably shaped Summerland's evolving eclectic character. For a decade or so now, the focus seems to be to "clean the place up" and to "preserve, protect, and enhance" Summerland's charm as new, bigger homes and businesses replace smaller, older ones. **CULTURAL CHARACTER:** From a distance, Summerland is relatively well defined. Its boundaries are delineated rather clearly. Within them is an urban pattern of narrow streets, small scale buildings and relaxed landscaping on former tent lots. Casual, low key and quaint beach town residential areas merge with upscale cafés, antique shops and other commercial development in the business corridor along the base of two of the hillsides. Surrounding areas comfortably sprawl outward on rural sized, contemporary styled properties. The ocean bluffs are a mellow, humble

place where a limited number of modest homes co-exist comfortably with popular recreational areas and naturalness. A post office serves as the community's hub.

Perhaps to better understand Summerland's evolving eclectic mix and charm, we might consider descriptions expressed over the years in newspapers, magazines, and at public meetings:

"where the debris meets the sea"

"a picturesque hillside hamlet with a broad beach as a front yard and the Santa Ynez Mountains as a beautiful backdrop"

"the little hillside village overlooking the beach"

"way more than the sum of its parts, this quaint little beach town nestled between Montecito and Carpinteria"

"unless you live there...you'll think of it as a town thrown together, helter-skelter, by a bunch of tipsy carpenters on a wild weekend binge"

"the unwanted child of Santa Barbara County, shoved off to the side and forgotten"

"where old houses seem to lean on each other for comfort and reassurance"

"having two sides severed by the freeway"

"a pretty little village"

"a shared, modest, mellow place"

"a quiet place with superb views, peaceful and charming"

"where the view's the thing"

"a cozy location"

"the next Laguna Beach"

"Santa Barbara County's hippie-ville and junkyard"

"a fun little bohemian beach town right next door to opulent Montecito"

"an easy, offbeat getaway"

"still funky"

"an upscale bedroom community"

"overall it's pretty low key down here"

"being very relaxed, very laissez-faire"

"friendly, a great place to live"

"Admittedly, it's an unusual combination of attractions for a getaway—spectacularly pricey antiques, a golden beach and remnants of a colorful bohemian past—but somehow Summerland, as always, makes it all add up."

Summerland is valued for its small town character, historical and coastal resources, recreational areas and great views. Summerland's eclectic charm is derived from a range of influences that help sustain a local sense of identity and complement and strengthen the community spirit of Summerlanders.

Matt, we hope this overview will aid in the project team's decision-making process and that you will honor our suggestions, which represent broad community consensus and which were arrived at after many meetings and much deliberation.

Sincerely,

Board of Directors
Summerland Citizens Association

Summerland Citizens Association

Comment 1 Aesthetics and Design

Pavement surface treatment is proposed to be installed within the project limits. However, Federal Highway Administration policy restricts making adjustments for pavement type in the prediction of highway traffic noise levels and using specific pavement types or surface textures as noise abatement measures (per the Federal Highway Administration "Highway Traffic Noise Analysis and Abatement: Policy and Guidance").

Soundwalls S414 and S392 were not recommended for construction due to severe visual impacts resulting from ocean view blockage. However, Soundwall S424 is currently proposed to provide noise attenuation for Summerland by the Sea Mobile Home Park. See Volume I, Table 2.37 for noise levels in Summerland and Figure 2.21-31 for soundwall locations.

Construction of soundwalls is the most effective form of noise abatement to provide the required 5-dBA reduction (per the Federal Highway Administration). The other forms of attenuation are either not cost effective or occupy an unreasonable amount of land to bring the noise down by the required threshold of 5 dBA (i.e., 100 feet of thick vegetation will be needed to provide 5 dB of noise attenuation).

Summerland Citizens Association

Comment 2 Aesthetics and Design

The draft environmental document identified substantial visual impacts through Summerland and along the project corridor. Mitigation measures were included for aesthetic treatment to new and modified structures, walls and barriers. Refinement of aesthetic and landscaping design details will be developed in collaboration with representatives of each affected community.

Summerland Citizens Association

Comment 3 Aesthetics

Mitigation measures relating to visual impacts, including aesthetic treatment to new and modified structures, walls and barriers are shown in Section 2.1.6 of the draft environmental document and final environmental document. Refinement of the aesthetic design detail will be developed in collaboration with County Staff and designed representatives of each affected community. There may be additional opportunities for design input during the Coastal Development Permit process.

Summerland Citizens Association

Comment 4 Aesthetics

The Caltrans resource conservation policy requires the use of native or horticulturally appropriate, low resource plant species and landscape design concepts. Lower growing plants will be used where it is important to protect views. Measures listed in Section 2.3.1 call for removal of arundo.

Summerland Citizens Association

Comment 5 Aesthetics

Section 2.1.6 of the draft environmental document and the final environmental document included minimization and mitigation measures that require any new plantings to be lower-growing to avoid blocking views of the Pacific Ocean and mountains.

Summerland Citizens Association

Comment 6 Aesthetics

Section 2.1.6 of the draft environmental document and final environmental document contained measures to limit any new lighting to specifications that minimize excess light pollution and glare to the greatest extent feasible.

Summerland Citizens Association

Comment 7 Design

The existing southbound off-ramp to Summerland and the new right-side southbound on-ramp from Sheffield Drive will be connected by an auxiliary lane (or merging lane) over Ortega Hill, which will affectively lengthen both ramps.

Summerland Citizens Association

Comment 8 Design

The scope of the South Coast 101 HOV Lanes project includes elements that are essential to the installation of an HOV lane in this corridor. The construction of these lanes on U.S. 101 in and near the community of Summerland will not preclude the construction of a future pedestrian overcrossing and/or undercrossing in this vicinity.

To the degree that the community and related community plans achieve a clear and cohesive plan for a preferred crossing alignment within the community, and the implementing agency has completed the associated environmental clearance, the South Coast 101 HOV Lanes project team can work closely with the implementing agency—likely the County of Santa Barbara—to potentially integrate or accommodate overcrossing or undercrossing features into the design of the HOV Lanes project. This work can occur simultaneously during the design phase of the HOV project.

Summerland Citizens Association

Comment 9 General Comment

The South Coast 101 HOV Lanes project would include project features and minimization measures that would provide noise attenuating pavement surfacing and other measures to decrease noise levels. The project would also include aesthetic treatments to structures and a landscape plan that would provide planting to the greatest extent feasible.



July 6, 2012

Matt Fowler
Caltrans District 5
50 Higuera Street
San Luis Obispo, CA. 93401

Re: Draft Environmental Document for the Highway 101 HOV Project

Dear Mr. Fowler:

Thank you for the opportunity to comment on the DEIR document for the Highway 101 HOV Project from Carpinteria to Santa Barbara. Ty Warner Hotels & Resorts is a major property owner in Montecito. We own the Four Seasons Biltmore Resort Hotel, San Ysidro Ranch and Montecito Country Club. We are one of the largest payers of property taxes, retail taxes and transient occupancy taxes in Santa Barbara County.

The Draft Environmental Document fails to comply with the requirements of the California Environmental Quality Act (CEQA) in at least the following areas:

1. Failure to analyze and consider a reasonable range of alternatives
2. Failure to identify environmentally superior alternatives
3. Failure to address the feasibility of alternatives
4. Failure to adequately address traffic, visual aesthetics, noise and impact of construction, and
5. Failure to adequately address consistency with local policies.

While there has been comments related to the alternative Modified "F" plan, this plan is still inadequate and does not address noise impacts or anticipated congestion of traffic from ulterior routes. The greatest impact to the community and public is the construction schedule, re-routing of traffic, delays, noise and air quality. In addition, our properties will greatly suffer in business and occupancy during construction. We had to endure the construction along Highway 101 from Montecito to the Milpas Street interchange and suffered greatly. The projected relief of traffic from ancillary streets such as Cabrillo Boulevard never materialized. The closure of the off ramps at Hot Springs Road Northbound & Southbound should be reconsidered. It is my understanding that the Montecito Association has submitted an alternative plan known as "J" modified. While some elements of this alternative plan can be supported, the redesign of the existing roundabout at Hot Springs Road, Coast Village Road and Old Coast highway cannot be supported at this time.

Another major concern is the impact of traffic, routes, noise and air quality if the Miramar Hotel begins construction during the same time as the Highway 101 HOV plan. Again, the projected impacts to the community should be considered as a cumulative impact.

In closing, please reconsider and submit other alternatives so that the public can be the benefactor of a superior plan and not be subjected to a Los Angeles style of massive concrete, overpasses and walls.

Respectfully submitted,

William Medel

William Medel
Project Development Manager
Ty Warner Hotels & Resorts

Ty Warner Hotels & Resorts (Medel, William)

Comments 1 General

A full range of build alternatives was considered in the draft environmental document; some of these were eliminated from further consideration because they did not meet the purpose and need of the project. Information on alternatives and configurations for the Cabrillo Boulevard Interchange can be found in Volume I, Section 1.3.6. In addition, the California Environmental Quality Act requires that a reasonable range of alternatives be studied. The California Environmental Quality Act also requires identifying an environmentally superior alternative in the environmental document, it does not stipulate that it be done during the draft environmental document stage. Caltrans typically does not identify the environmentally superior alternative until the final document. The selected preferred alternative (Alternative 1) for this project is also the environmentally superior alternative. The preferred alternative was designed with the goal of minimizing impacts to wetlands, riparian areas, and mature vegetation to the maximum extent possible. Refer to Volume I, Section 1.3.6, for more information.

This project would be designed to provide two lanes open in each direction of U.S. 101 throughout construction, though some lane closures may be required for night work when traffic is at its lowest volume. Median off-ramps will not be closed until replacement ramps are built. Temporary ramp improvements may be needed based on projected use. Also see response to comment 2 for more information. Please refer to comment 2 in regard to impacts to traffic, visual aesthetics, noise, and construction.

The California Environmental Quality Act does not require an analysis of all the policies for which the project is consistent, only policies for which the project is inconsistent. There is no requirement for Caltrans to provide an overly exhaustive analysis of all the ways the project would adhere to Local

Coastal Plans. For discussion of the project's inconsistencies with local policies please refer to Section 2.1.1.2.

Ty Warner Hotels & Resorts (Medel, William)

Comments 2 F Modified and Traffic

A Traffic Management Plan will be developed during the design phase of the project to address potential impacts on traffic flow during construction. The project's final design will ensure there are two lanes open in each direction on U.S. 101 throughout construction, although some short-term mainline lane closures may be required for night work. Although some on- and off-ramps would be closed for part of the construction period in other areas of the project, significant traffic impacts are not expected within the City of Santa Barbara. Specific construction staging plans developed for the Cabrillo Boulevard Interchange Configuration F Modified allow for new ramp connections to be built before the closure of the ramps to be replaced. Therefore, no significant ramp or local road closures are planned within the City of Santa Barbara for this project.

There is no way to entirely avoid noise impacts during construction, but Caltrans' standard contract specifications pertaining to construction noise would be implemented. These include actions such as limiting work hours, using mufflers, and developing a public outreach plan that includes keeping the public notified of the construction schedule and providing contact information for complaints. See the updated discussion in Volume I, Section 2.4 (Construction Impacts), of the final environmental document.

The Visual/Aesthetics section in the draft environmental document included seven Observer Viewpoints through Montecito, from the highway and from the surrounding community. The related analysis documented and disclosed the type and extent of visual impacts to Montecito's scenic vistas, visual resources and community character. The draft environmental document

acknowledged a high degree of viewer sensitivity through Montecito based in large part on review and understanding of the Montecito Community Plan policies. Applicable visual policies from the Montecito Community Plan are cited and included in the analysis; existing visual conditions are discussed, and the proposed project is thoroughly presented and disclosed in map form, text narrative, illustrations and simulations.

The project proposes to include a noise-attenuating pavement surface that would reduce noise levels. The type of pavement surface has not yet been determined; various surfaces are being tested and developed by Caltrans and other transportation departments to find the best technology.

The project was analyzed for mobile source air toxics using Federal Highway Administration's protocol and found to have no meaningful impacts. The purpose of the project is to relieve future congestion, which in turn will reduce traffic emissions associated with idling vehicles. Caltrans Standard Specification sections pertaining to dust control and dust palliative applications are a required part of all construction contracts and would effectively reduce and control emission impacts during construction. Please refer to Volume I, Section 2.4, for measures pertaining to reducing air pollution during construction.

Ty Warner Hotels & Resorts (Medel, William)

Comments 3 Elements of J Modified

The Project Development Team selected the F Modified configuration for the Cabrillo Boulevard/Hot Springs Road Interchange. The F Modified configuration would direct beach traffic to the new northbound off-ramp at Hot Springs, bypassing the roundabout and Hermosillo Road. A new southbound on-ramp at Cabrillo would also divert traffic away from Coast Village Road. Please refer to Volume II, Appendix I and J, for more information

on the evaluation of the Montecito Association's Proposal and the Left-hand Ramp Fact Sheet, respectively.


Ty Warner Hotels & Resorts (Medel, William)

Comments 4 J Modified

The Miramar Hotel Resort construction and permitting are outside Caltrans' jurisdiction, but within the jurisdiction of the County. The County has determined that the redevelopment of Miramar has no impact to the area or the impact can be mitigated under the conditions of that permit.

In addition, during construction at least two lanes in each direction would remain open for peak-period travel. U.S. 101 mainline lane closures would occur mainly during off-peak hours to minimize construction-related travel impacts within the corridor. Construction of the build alternatives would be done with measures taken to avoid public access impacts to park and recreational facilities, with alternate routes made available for use during construction. Construction related disruptions would be minimized through development and implementation of a Traffic Management Plan. Caltrans will work closely with the local jurisdiction staff and industry leaders during the design phase to refine methods for minimizing traffic disruption during the construction of the project.

Construction noise and air impacts are currently addressed in Volume I, Section 2.4 of the final environmental document. Caltrans follows the Federal Highway Administration Noise Standards and the Caltrans Noise Protocol to minimize noise levels during construction. Also, Caltrans Standard Specification sections pertaining to dust control and dust palliative applications are a required part of all construction contracts and would effectively reduce and control emission impacts during construction.



Comment Card

NAME: SAM KAISER 805-969-7095

ADDRESS: 1930 B CITY: MONTECITO ZIP: 93108

REPRESENTING: NORTH JAMESON LANE 1930-1944
26 UNITS

☐ Please add me to the project mailing list.

☒ Please email me updates on this project. E-mail Address: SAM@MVPENT.COM

I would like the following comments filed in the record* (please print):







HELLO MATT - I AM PRESIDENT OF THE VILLA DE MONTECITO HOMEOWNERS ASSOCIATION. REPRESENTING 26 UNIT OWNERS AT 1930-1944 NORTH JAMESON LANE. CURRENT PLANS DO NOT HAVE A SOUNDWALL IN FRONT OF OUR COMMUNITY (RIGHT AT THE SHEFFIELD EXIT). WE ABSOLUTELY MUST HAVE A SOUNDWALL, PLEASE RECONSIDER. IN ADDITION, AS YOU WILL BE TOTALLY RECONFIGURING THE SHEFFIELD ON AND OFF RAMP, PLEASE CONSIDER A PEDESTRIAN WALKWAY FROM JAMESON LANE TO THE BEACH (A DIRECT STRAIGHT LINE FROM VDM PROPERTY)

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
Environmental Branch
Attention: Matt Fowler
50 Higuera Street
San Luis Obispo, CA 93401

THANK YOU! Sam Ka

How Did You Hear About This Meeting? ☐ newspaper ☐ newsletter ☒ someone told me about it ☐ other: _____

Villa De Montecito Homeowners Association—Sam Kaiser (President)

Comment 1 Noise and Beach Pathway

As a result of public comment, Caltrans staff reevaluated Soundwall S464 in areas of high-density development to identify short sections of soundwalls that might be financially reasonable. It was also determined that two additional benefitted units had not been accounted for in the original calculations for Receptor R70. As a result, there was a recommendation to extend Soundwall S464 to the south to protect the densely populated area near the Sheffield Interchange. Please refer to Volume I, Section 2.2.7, for more information on soundwalls.

Villa De Montecito Homeowners Association—Sam Kaiser (President)


Comment 2 Beach Pathway

Providing a pedestrian pathway from Jameson Lane to the beach is outside the scope of the project.

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Public Individuals

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Comment Card

NAME: Frank Abatemarco
 ADDRESS: 74 Depot Rd CITY: Montecito ZIP: 93108
 REPRESENTING: Self

☒ Please add me to the project mailing list.
☒ Please email me updates on this project. E-mail Address: Frank Abatemarco @ gmail.com

I would like the following comments filed in the record* (please print):







1 | I oppose the various
versions of Cabrillo/Hot Springs.
Because it changes the character of
our unique community.

2 | Elimination of the left hand
off ramp is not worth the many
other changes that will result to
the community.

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
 Environmental Branch
 Attention: Matt Fowler
 50 Higuera Street
 San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☐ newsletter ☐ someone told me about it ☐ other: _____

Abatemarco, Frank**Comment 1 Alternative Preference**

The existing landscaping through Montecito is recognized as an important aesthetic resource of high value to the community. A guiding principle of the project design is to preserve as much existing vegetation as possible. Where existing vegetation cannot be preserved, the project will be re-landscaped to the greatest extent possible while considering safety and maintenance requirements. Refinement of aesthetic and landscaping design details, although not required to meet the intent of mitigation, will be developed in collaboration with representatives from each affected community. Also, each permitting jurisdiction as part of the Coastal Development Permit process may require additional measures beyond the mitigation that has been identified in the final environmental document.

Abatemarco, Frank**Comment 2 Left-side Off-ramps**

Caltrans has determined that left-side median ramps cannot be retained. The off-ramps at the Cabrillo Boulevard interchange have significant operational limitations, including limited stopping sight distance and collision rates above the statewide average. Since the left-side ramps need to be reconstructed and/or relocated, they must be constructed to meet current engineering standards. See Appendix J for the Left-side Ramps Fact Sheet for further explanation of how left-side exits are contrary to what drivers expect. Further information on Caltrans findings related to the left-side off-ramps can be found in Appendix J.



Able, Nell

Length of Project

The project scope includes plans to build a 10.9-mile part-time HOV lane from the City of Carpinteria (post mile 1.4) to the southern portion of the City of Santa Barbara (post mile 12.3) where three lanes exist. Traffic data were collected, and an existing conditions analysis was performed (Existing Conditions Operations Analysis, December 2008) for the entire 27-mile corridor from the Santa Barbara/Ventura county line to the Winchester Canyon/Hollister Avenue Interchange in Goleta. These studies concluded that there could be some operational benefits to extending the HOV lanes northward, but there is no current proposal to do that and it is outside the defined scope of this project.

JULY 6 2012

VIA EMAIL TO SOUTH.COAST.101.HOV@DOT.CA.GOV

Mr. Matt Fowler, Senior Environmental Planner
Environmental Analysis
California Department of Transportation
50 Higuera Street
San Luis Obispo, CA 93401

Re: Comments on South Coast 101 HOV Lanes Project; Project ID# 0500000225, Santa Barbara County, Draft EIR/EA (Project)

Dear Mr. Fowler:

I own the property at 1807 Fernald Point lane in Montecito. My property will be impacted by the Project. Noise impacts are my greatest concern because my home is located immediately adjacent to Highway 101. I already suffer from substantial freeway noise at my home, yet the environmental document proposes NO sound wall for the highway section adjacent to my house. The environmental document is inadequate because it includes no sound wall to protect my property. Without a sound wall, noise from the widened highway will increase steadily (the EIR/EA estimates decibel impacts from the project upon my neighborhood ranging from the high 60's to the low 70's). Most acoustical engineers would agree that a 65 decibel level in an exterior area is beyond the level of acceptability and constitutes a significant impact. The EIR/EA includes a decibel range in my neighborhood, after the project, of the high 60's to the low 70's. This is a significant impact and must be mitigated. The most appropriate mitigation measure is a sound wall, which I support. Without this mitigation measure, the EIR/EA is inadequate. The noise section of this environmental document must be revised or the EIR/EA to include a sound wall for my neighborhood.

Sincerely,
Nurit M. Adizes

Dr. Ichak Adizes and Nurit Manne' Adizes 1807 Fernald Point Lane Santa Barbara CA, 93108

Adizes, Dr. Ichak and Nurit Manne'

Noise

As a result of comments received during public review, Caltrans staff reevaluated Soundwall S471. This assessment identified two additional benefitted residences associated with Receptor R76 that were overlooked in the original calculations. These units were confirmed and added to the new calculations. A second row of homes was reevaluated. The study confirmed that the homes would not be benefitted by a wall. Caltrans staff also reevaluated high-density residential locations behind Soundwall 471 to determine whether there were short sections that might be financially reasonable. But, no further segments of S471 were determined to be financially reasonable. Also, it was noted that a soundwall at this location would cross a Federal Emergency Management Agency-identified floodway and create higher flood flows that could not be passed through using floodgates. Proposed soundwalls that would cross this floodway are not considered feasible and not recommended for construction due to the potential for exacerbating flooding upstream of the soundwall locations. Please refer to Volume I, Section 2.2.7, for more information related to Soundwall S471.

Caltrans is the lead agency on this project for both the California Environmental Quality Act and National Environmental Policy Act. Caltrans determines the significance of environmental impacts, including noise impacts, under the California Environmental Quality Act and National Environmental Policy Act criteria of context and intensity. Caltrans uses the Federal Highway Administration guidelines to determine when noise abatement must be considered, however that is not considered a threshold of significance. Table 2.36 in Section 2.2.7 (Noise) in Volume 1 of the final environmental document shows a project build noise level increase for the project of a maximum of 2 dB above the existing noise levels for residences in Fernald Point. This minimal increase is not considered a significant impact

given the fact that according to the Caltrans Technical Noise Supplement (TeNS) a 2 dBA increase is not detectable to a healthy human ear and a 3 dBA increase is barely noticeable to a healthy human ear. Therefore, the increase is not considered a significant impact under CEQA or NEPA and no mitigation is required.



Michael Ahn
<ahncore@cox.net>
05/29/2012 01:09 PM

To: <south.coast.101.HOV@dot.ca.gov>
Cc:
bcc:
Subject: Comment Card

This is a comment for the South Coast HOV Lanes (US 101) for the City of Carpinteria.

The highway construction should require:
(1) "Noise-Abating" surface asphalt.
(2) South Walls along the city

Michael Ahn
4848 7th St.
Carpinteria, CA 93013

Ahn, Michael


Comment 1 Noise-Attenuating Pavement

The project proposes to include a noise-attenuating pavement surface that would reduce noise levels. The type of pavement surface has not yet been determined; various surfaces are being tested and developed by Caltrans and other transportation departments to find the best technology.

Ahn, Michael

Comment 2 Noise

Soundwalls are recommended for construction only in locations where the predicted future noise levels approach or exceed 67 decibels for residential uses; soundwalls must also meet the Caltrans/Federal Highway Administration criteria for being financially reasonable and acoustically feasible by reducing noise levels by at least 5 decibels. Please refer to Volume I, Section 2.2.7, for more information related to soundwalls.



Comment Card

NAME: LYNNE ALEXANDER
 ADDRESS: 1940 NORTH JAMESON LN #8 CITY: SB ZIP: 93108
 REPRESENTING: RESIDENT DIRECTLY IMPACTED BY PROJECT

☐ Please add me to the project mailing list.
☐ Please email me updates on this project. E-mail Address: _____







I would like the following comments filed in the record* (please print):

- 1 X I WANT TO ENSURE THAT VILLA DE MONTECITO IS VIEWED AS 26 RESIDENCES AND NOT ONE
- 2 2 CONCERNED THAT THE SOUND TESTING PERFORMED WAS NOT BE DURING PEAK NOISE LEVELS I.E. EARLY MORNING
- 3 3 CONCERNED THAT SOUND WALL WILL NOT BE CONSTRUCTED ALONG AREAS MOST BENEFICIAL TO RESIDENTS IMPACTED BY THIS PROJECT
- 4 4 CONCERNED THAT ACCESS WILL BE ELIMINATED AND SECONDARY ROADS WILL HAVE TO BE USED TO GET ON FREEWAY

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:
 EXAMPLES IS COAST VILLAGE RD DEBACLE.

CALTRANS DISTRICT 5
 Environmental Branch
 Attention: Matt Fowler
 50 Higuera Street
 San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☐ newsletter ☒ someone told me about it ☐ other: _____

Alexander, Lynne**Comment 1 Benefitted Receptors**

For the residential development noted, the benefitted number of residences was determined to be eight, essentially all of the units directly fronting the freeway. As a result of public comment, Caltrans staff reevaluated higher density residential areas to identify short sections of soundwalls that might be financially reasonable. It was determined that extending Soundwall S464 to the south would protect the densely populated area near the Sheffield Interchange. Therefore, this wall is recommended for construction. Please refer to Volume I, Section 2.2.7, for more information related to Soundwall S464.

Alexander, Lynne**Comment 2 Noise Readings**

It is an accepted industry methodology to perform readings during off-peak hours and adjust these outputs to account for peak hour levels per Caltrans and federal noise protocol. Long-term monitoring provides noise outputs with companion traffic counts for each hour, which allows reasonable prediction of actual noise outputs at any given time. This removes the necessity of collecting only existing noise data during peak noise hours for the purpose of adjusting or "calibrating" the model outputs. Caltrans Technical Noise Study, October 1998, page N-66, details the method of adjusting field readings to other than the noisiest hour. For modeling future traffic, the Noise Study Report (NSR) assumes worst-case traffic, 1,900 vehicles per lane, and 1,650 vehicles per lane for the future build HOV lane.

Alexander, Lynne**Comment 3 Noise**

Please refer to comment 1.

Alexander, Lynne

Comment 4 HOV Lanes

There are no plans for the HOV project to close any access from the Sheffield Interchange.



Comment Card

NAME: MR. ROBERT ANTONINI

ADDRESS: PO BOX 1033 CITY: SUMMERLAND ZIP: 93067

REPRESENTING: MYSELF AT SUMMERLAND-BY-THE-SEA

☒ Please add me to the project mailing list.

☐ Please email me updates on this project. E-mail Address: _____

I would like the following comments filed in the record* (please print):

I would like to see the sound wall on the 101
AT SUMMERLAND BY-THE-SEA IN SUMMERLAND
IS THERE ANY DIFFERENCE IN SOUND WALL HEIGHT

1

Robert Antonini

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
 Environmental Branch
 Attention: Matt Fowler
 50 Higuera Street
 San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☐ newsletter ☐ someone told me about it ☐ other: _____



Comment Card

NAME: Robert Antonini

ADDRESS: 21550 RTE 101 Hill CITY: SUMMERLAND ZIP: 93067

REPRESENTING: MYSELF AT SUMMERLAND-BY-THE-SEA

☒ Please add me to the project mailing list.

☐ Please email me updates on this project. E-mail Address: _____

I would like the following comments filed in the record* (please print):

Summerland By The Sea is right next to the freeway
It's on three lanes of land. The sound wall should reflect that
The highest lane should have the largest sound wall + the lower
ones a smaller sound wall or in order to block the ocean view.
The dirt in the air from the freeway is already very
high. I hope you can do something to lower that
dust from, this oil, exhaust from cars + the highway itself.
The motorcycles make the most noise going up + down the
freeway.

1

2

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
 Environmental Branch
 Attention: Matt Fowler
 50 Higuera Street
 San Luis Obispo, CA 93401

How Did You Hear About This Meeting? ☐ newspaper ☐ newsletter ☐ someone told me about it ☐ other: MAIL



Antonini, Robert (Comment Letter 1)

Noise

The only recommended soundwall near Summerland by the Sea is approximately 14 to 16 feet tall. The other soundwalls are not recommended for construction due to severe visual impacts (see response to Comment Letter 2).

Antonini, Robert (Comment Letter 2)

Comment 1 Noise

Soundwalls S392, S414, and S374 are not recommended for construction since they were determined to not be financially reasonable. Furthermore, the Project Development also recommended these walls not be constructed because they would block prime ocean views and would result in severe visual impacts. Only Soundwall S424 is proposed for construction near the Summerland by the Sea mobile home park to provide abatement for severely impacted receptors. The wall would be approximately 14 to 16 feet high. Please refer to Volume I, Section 2.2.7, for more information related to these soundwalls.

Soundwall S374 and S392 not being proposed for construction results in several locations where severe receptors are present with no proposed soundwalls. This condition has occurred due to prime ocean views being blocked by a soundwall or floodways being blocked by a soundwall. In these cases, providing acoustical treatment on private property or soundwalls on county property, if appropriate, will be considered in coordination with the property owner. Acoustical treatment on private property might include insulation, dual paned windows, air conditioning or private walls.

Please refer to Observer Viewpoint 7 in Section 2.1.6, Volume I, for discussion of prime ocean views in Summerland and Section 2.1.7 for more details on Soundwalls S374 and S392.

Antonini, Robert (Comment Letter 2)

Comment 2 Noise and Air Pollution

According to the Air Quality Report prepared September 2011 and the addendum to the Air Quality Report prepared 2013, the project would not result in significant air quality impacts. Furthermore, since the project will relieve traffic congestion within the corridor, the additional HOV lane coupled with fleet turnover over time that meet the Environmental Protection Agency's vehicle and fuel regulations, the regional air pollution time would see a substantial decrease in mobile source air toxics. Refer to Volume I, Sections 2.2.6 and 2.5 in the final environmental document for discussion of air quality minimization measures and Caltrans Standard Specifications that would decrease operational air emissions during construction. Refer to Section 2.2.6 for discussion of entrained dust.



Tina <konstantina@cox.net>
05/10/2012 09:14 PM

To: <South.Coast.101.HOV@dot.ca.gov>
cc: <scott_leades@dot.ca.gov>

bcc:

Subject: Comment on South Coast US101 Improvement hearing

We would like the following comments filed in the record:

This letter is in strong support of the South Coast 101 HOV Lanes Project. This freeway is in long-term need of repair and improvement to accommodate present day and future traffic through our community. Improvements to the freeway will address future traffic needs and provide mitigation measures that are, frankly, needed now.

In particular, We support Alternative 1. Alternative 1 provides the most reasonable solution while maintaining the historical landscaped median and outside parkway of the freeway.

We support Alternative F Modified for Cabrillo Boulevard and strongly oppose those options that include Hermasillo and Los Patos Way off-ramps. Any alternative that includes a Hermasillo off-ramp would add unnecessary traffic to Coast Village Road creating an immediate and permanent traffic congestion. Likewise, any alternative that keeps the Los Patos off-ramp will require raising the UP Railroad tracks and create additional sound and visual impacts to the area. Alternative F Modified is the best solution for this interchange.

Our residential property is identified within Receptor Group 31 (R88 and R89) and is considered seriously affected by noise abatement criteria of 67 dBA. Each of these receptors exceeds the criteria for both present day traffic and traffic. We strongly support the use of a soundwall to mitigate noise from highway traffic. Also the soundwall will prevent vehicles from going through the chain link fence that is presently there and ending on the frontage road that is level with the freeway in our area. This has happened several times, one in which has ended in 2 fatalities in front of our driveway.

We suggest that Caltrans consider starting construction with the soundwalls and the Cabrillo Boulevard interchange and then proceed south in feasibly constructible segments. We suggest that Caltrans consider the most expeditious methods of construction to complete the work as quickly as possible, including the use of design-build delivery.

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2

3

Thank you.
Sincerely,
Elias & Tina Argyropoulos

Please add us to the project mailing list:
1420 N. Jameson Lane
Santa Barbara, CA 93108

home ph# 805-969-4061
konstantina@cox.net - please send updates!

Argyropoulos, Elias and Tina

Comment 1 Alternative and Configuration Preference

After considering public input, the Project Development Team selected Alternative 1 as the preferred alternative and recommended that F Modified be selected for the Cabrillo Boulevard/Hot Springs Road Interchange configuration.

consideration of these options will be considered after the environmental phase of the project is complete.

Argyropoulos, Elias and Tina

Comment 2 Noise

The final environmental document recommends building Soundwall S519 to provide abatement for severely impacted receptors at R88 and R89. Furthermore, As a result of public comments on the draft environmental document, Caltrans staff reevaluated Soundwall S520 located in high-density residential areas and a wall to extend S520 northward to protect the densely populated area between Santa Isabel and Olive Mill is now being recommended for construction. Please refer to Volume I, Section 2.2.7, for more discussion of Soundwall S520.

Argyropoulos, Elias and Tina

Comment 3 Construction

The proposed project schedule shows project construction beginning in 2018. Due to the availability of funding and the magnitude and length of the proposed project, it is anticipated that construction would be divided and carried out in separate contracts over a period of at least 10 years. The timing of the phased construction may be affected by factors such as available funding, the location of other nearby highway construction projects, utility relocation needs, and the Coastal Development Permit process. The use of design-build delivery for state roadways is controlled by the state legislature, requiring project-specific legislation. Caltrans is interested in options for constructing the project in ways that will minimize impacts. Further



<michellearmstrong@cox.net

To: <South.Coast.101.HOV@dot.ca.gov>

>

cc

07/08/2012 11:13 PM

bcc

Subject: 101 through Montecito

Thank you very much for considering the following for the widening of Highway 101 through Montecito: a) F-Modified is a must; it will keep heavy traffic out of our neighborhoods. b) please consider widening the Union Pacific Railroad bridge over E. Cabrillo Blvd. c) Montecito is a particularly beautiful part of Santa Barbara and deserves careful landscape planning along roadways and medians.

Michelle Armstrong - Almost 50-year resident of Montecito

1
2
3

Armstrong, Michelle

Comment 1 Configuration Preference

After considering public input, the Project Development Team recommended selecting F Modified for the Cabrillo Boulevard/Hot Springs Road Interchange configuration.

Armstrong, Michelle

Comment 2 Railroad Bridge

The City of Santa Barbara has taken the lead on the preliminary design of the project that would replace the railroad bridge and provide improved bicycle and pedestrian access. SBCAG will provide funding for the preliminary design work and will continue seeking additional funds. This project is being handled separately from the South Coast 101 HOV project and will have its own environmental document.

Armstrong, Michelle

Comment 3 Aesthetics

The existing landscaping through Montecito is recognized as an important aesthetic resource of high value to the community. A guiding principle of the project design is to preserve as much existing vegetation as possible. Where existing vegetation cannot be preserved, the project will be re-landscaped to the greatest extent possible considering safety and maintenance requirements. Refinement of aesthetic and landscaping design details will be developed in collaboration with representatives of each affected community. In addition, each permitting jurisdiction may require additional permitting measures beyond the mitigation identified in the final environmental document.



Comment Card

NAME: Mrs. Cathy Atkinson

ADDRESS: _____ CITY: _____ ZIP: _____

REPRESENTING: _____

☐ Please add me to the project mailing list.☐ Please email me updates on this project.

E-mail Address: _____

prefer no changes at all. if third lanes necessary, no HOV lane, minimal changes, keep left exits.

I would like the following comments filed in the record* (please print):

Montecito Country Club - if no other choice, F-modified money already spent on widening bridge, new roundabout. use what you already had.

Sound wall San Ysidro to Hixon

Re-check how many cars are going through as seems to be much less than 4 years ago. People working at home

*Place your comments into the Comment Box tonight or mail your comments by May 25, 2012 to:

CALTRANS DISTRICT 5
Environmental Branch
Attention: Matt Fowler
50 Higuera Street
San Luis Obispo, CA 93401

email to: South.Coast.101.HOV@dot.ca.gov

How Did You Hear About This Meeting? ☐ newspaper ☐ newsletter ☐ someone told me about it ☐ other: _____



U.S. Department of Transportation
Federal Highway Administration

Atkinson, Cathy

Comment 1 Alternative and Configuration Preference

The HOV lanes proposal is one project in a larger consensus-approved package of improvements that was developed from the Santa Barbara County Association of Governments-sponsored *101 In Motion* process. This larger package of recommended improvements was funded through the Measure A local transportation sales tax measure and included as planned improvements in the 2008 Regional Transportation Plan. This plan provides a multimodal approach to long-term congestion relief in this corridor. Congestion relief was also analyzed in the Regional Transportation Improvement Plan (RTIP); this plan also recommended adding lanes and implementing a peak hour HOV lane.

This project is funded by voter-approved Measure A funds, which are matched by federal funds. The proposed project benefits the region as well as the entire state because U.S. 101 is the only major highway along the California Coast in the area. Improving mobility and goods movement is vital to the environmental health and economic vitality of the state. The HOV lanes project is one component of the complete package supported by the Santa Barbara County Association of Governments and was disclosed to the public in the past four years. The HOV lane will function as a part-time lane; therefore it will only be an HOV lane during peak commute hours and will operate as a mixed-flow lane during off-peak hours.

Caltrans has determined that left-side median ramps cannot be retained. The locations of the existing left-side ramps at Sheffield Drive do not allow for the lane improvements to be made through the interchange without ramp reconstruction or excessively costly avoidance of the ramps. The off-ramps at Cabrillo Boulevard have significant operational limitations, including limited stopping sight distance and collision rates above statewide averages. Since the left-side ramps at both locations need to be reconstructed and/or relocated,

they must be constructed to meet current engineering standards. Also, left-side exits are contrary to what drivers expect. See Appendix J for the Left-Side Ramps Fact Sheet.

Configuration F Modified has been selected as the recommended configuration for the Cabrillo Boulevard/Hot Springs Road Interchange. With this interchange design, northbound beach traffic will be directed to the new northbound off-ramp at Cabrillo Boulevard. A new southbound on-ramp at Cabrillo would also divert traffic away from Coast Village Road.

Atkinson, Cathy

Comment 2 Noise

As a result of public input during review of the draft environmental document, Caltrans staff reevaluated Soundwall S498, focusing on high-density residential locations to determine whether short sections of soundwalls might be financially reasonable. As a result, a wall to the north that would extend S498 to San Ysidro Road is now recommended for construction.

Atkinson, Cathy

Comment 3 Traffic

As stated in Volume I, Section 2.1.5, baseline traffic counts were conducted in 2008. It is acknowledged that traffic volumes can vary from year to year. The average daily traffic counts on U.S. 101 within the project limits are forecast by 2040 to increase by 50 percent over 2008 levels.