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July 5, 2012

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(e)(2).

### **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

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.

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.

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.

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

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?

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.

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.

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.

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.

### **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

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

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:

- 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.

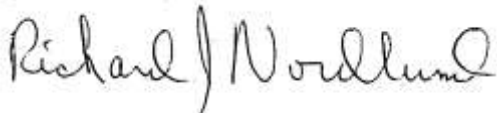
1. Consider the use of a southbound onramp at Los Patos that retains the existing railroad bridge by utilizing a sacrificial beam to protect the bridge from over-tall vehicles.
2. The policy decision not to acquire right-of-way for the project but to strictly apply minimum lane and shoulder width requirements 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.

## 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  
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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.

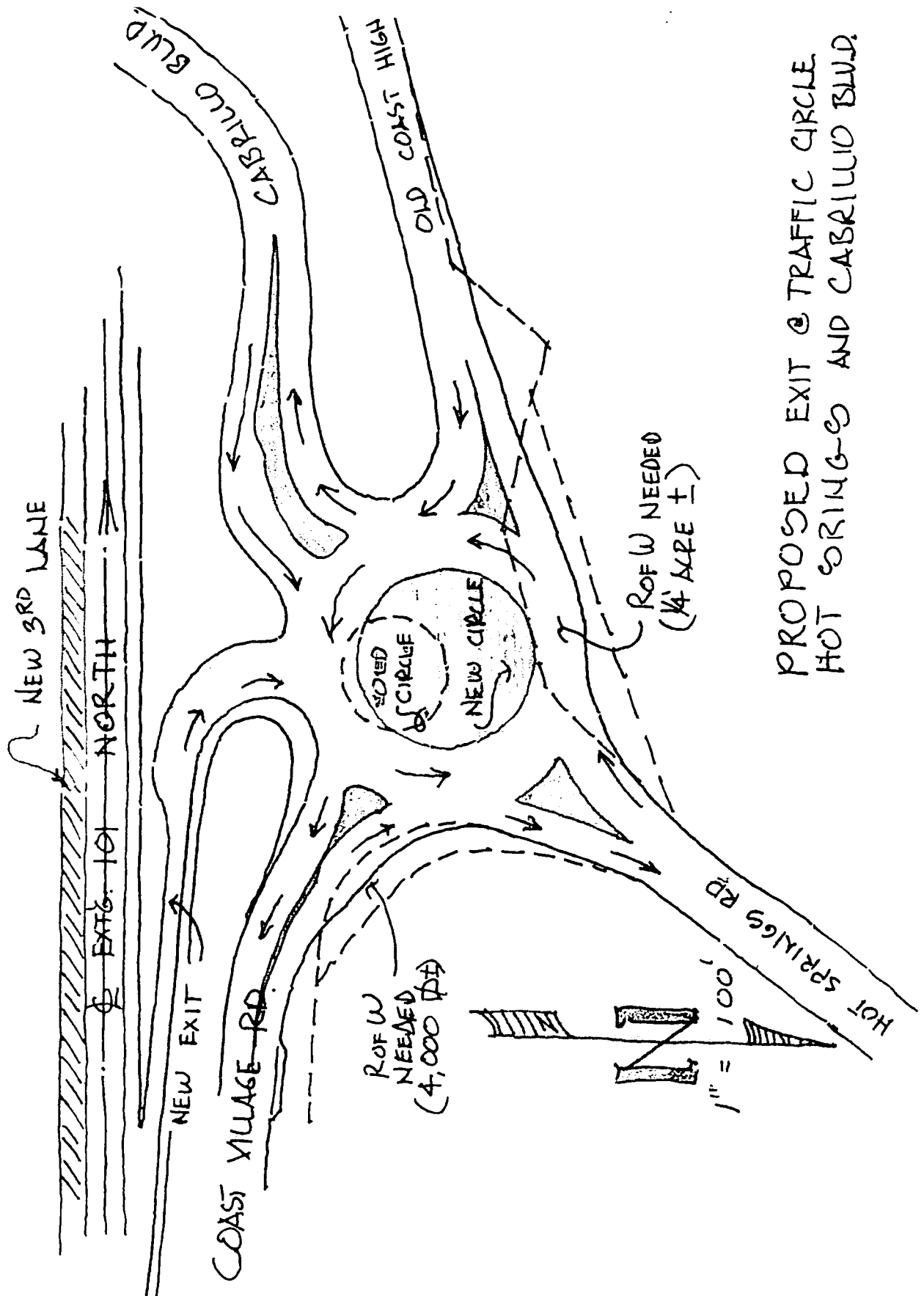
Length of Freeway:

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 1.  
Expanded Cabrillo/Hot Springs Roundabout  
Conceptual Design

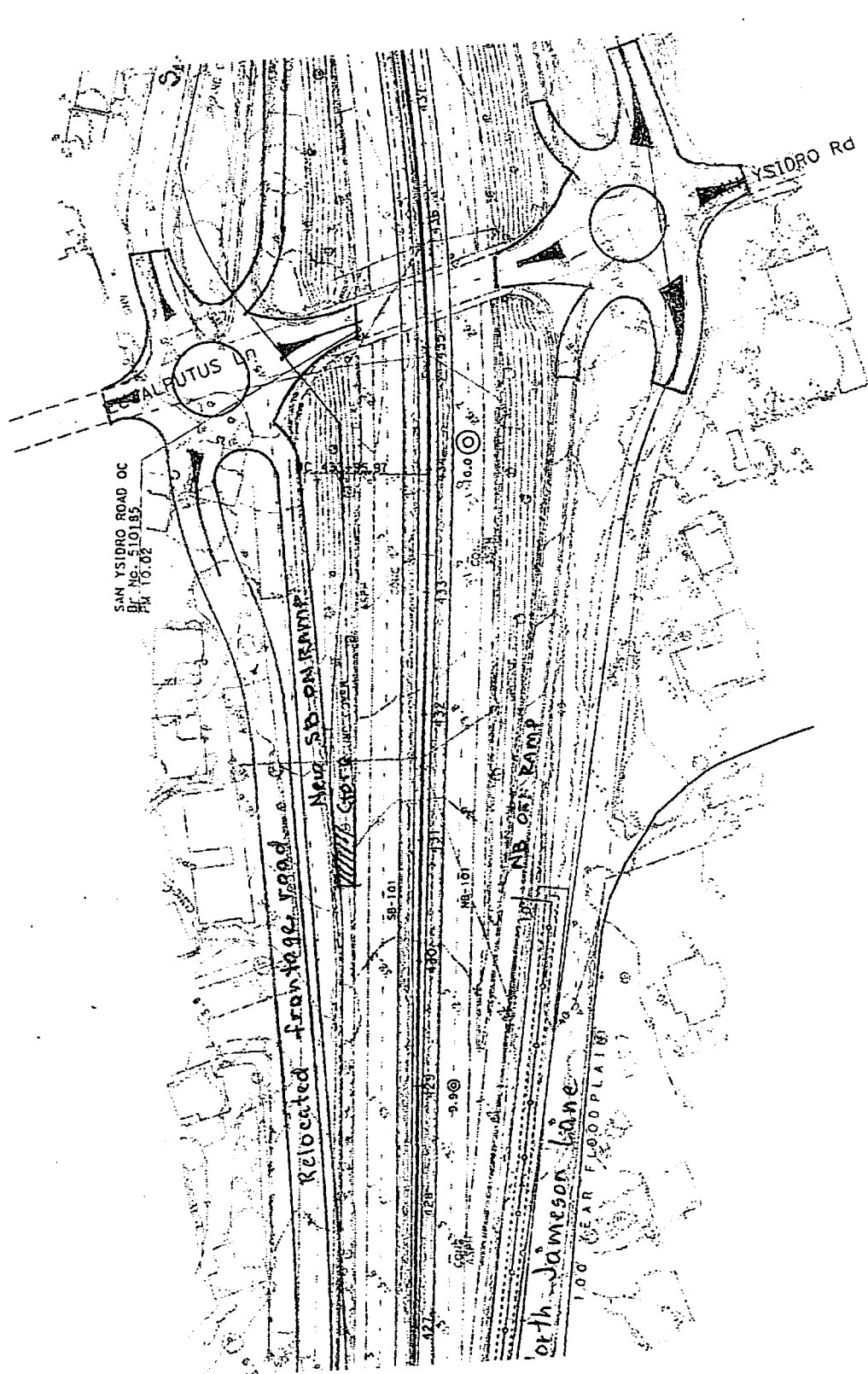


PROPOSED EXIT @ TRAFFIC CIRCLE  
HOT SPRINGS AND CABRILLO BLVD.



**Figure 2.**  
**Cabrillo/Hot Springs Alternative**  
**J-Modified**

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 Hemosillo 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