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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State Agencies	Contact	Comment / Response-pg. #
State Clearinghouse (2 Letters)	Scott Morgan	15
California State Parks	Richard Rozzelle	17
California Coastal Commission	Steve Hudson	18
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
Bike Santa Barbara County	Ralph Fertig	156
Brownstein Hyatt Farber Schreck, LLP (Attached Noise Study by Behrens and Associates)	Susan Petrovich	157 (attachment page 166)
Carpinteria Beautiful	Jim Taylor	188
Caruso Affiliated (Miramar Hotel property)	Matt Middlebrook	189
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
Montecito Association	Richard J. Nordlund	230
Montecito Estates Homeowners Association (2 Letters)	Floyd Wicks	249

Morehart Land Co.	Madeleine Mueller	254
Nygren Consulting	David J. Nygren	256
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

Public Individuals	Response-page. #	Alternative - Configuration Selection
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	-

Public Individuals	Response-page. #	Alternative - Configuration Selection
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	-

Public Individuals	Response-page. #	Alternative - Configuration Selection
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	-
Kuczmarski, Susan Smith	426	-
Ladin, Doreen	427	-
Leader, Patrick	429	-
Levine, Dr. Estees Potter	430	No Build
Lewis, Peter & Naila	431	-
Linowski, Eva (2 Letters)	432	F Mod

Public Individuals	Response-page. #	Alternative - Configuration Selection
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
Naughter, Tara	493	-
Nichols, Wade & Brenda	494	F Mod
Noe, Ron (via Valerie Hoffman)	495	-
Ouwehand, 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	-

Public Individuals	Response-page. #	Alternative - Configuration Selection
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	-

Public Individuals	Response-page. #	Alternative - Configuration Selection
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

Public Individuals	Response-pg. #	Alternative - Configuration Selection
The following individuals only selected an Alternative and/or Configuration		
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

Public Individuals	Response-pg. #	Alternative - Configuration Selection
The following individuals only selected an Alternative and/or Configuration		
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

Public Individuals	Response-pg. #	Alternative - Configuration Selection
The following individuals only selected an Alternative and/or Configuration		
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

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

Court Reporter Transcript of Comments	Response-pg. #	Alternative - Configuration Selection
Montecito Meeting 4/24/12		
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	-
Carpenteria Meeting 4/25/12		
St. James, Kathleen	647	-

Non-Profit Organizations and Businesses

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ARCHBALD & SPRAY LLP
ATTORNEYS AT LAW

505 Bath Street
Santa Barbara, CA 93101
Tel: 805.564.2070
Fax: 805.564.2081
www.archbald.com

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 nosier 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

KENNETH L. MOES
DOUGLAS B. LARGE
MARCUS J. KOCMUR
TREVOR D. LARGE
GEORGE J. TOMLINSON
(Of Counsel)
MALCOLM ARCHBALD
(1947-2002)
JOSEPH L. SPRAY
(1927-1989)

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 LLP
ATTORNEYS AT LAW

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

ARCHBALD & SPRAY LLP

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.

10 May 2012

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

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.

1

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.

2

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

Susan F. Petrovich

805.882.1419 tel
805.965.4333 fax
BCollins@bhfs.com

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. 1

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 2

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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. 2

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. 3

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. 4

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. 5

Section 1.4 (Permits and Approvals Needed) fails to identify the requirement for a federal Coastal Zone Management Act consistency determination. 6

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. 7

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. 8

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). 9

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. 10

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. 11

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. 12

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 13

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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. 13

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. 14

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 then complete relocation and reconstruction should be considered. 15

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. 16

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. 17

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 18

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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. 19

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. 20

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. 21

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. 22

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. 24

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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 complaint 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. **34**

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. **35**

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. **36**

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. **37**

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). **38**

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 **39**

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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. **39**

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. 39

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. 40

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 sates 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. 40

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. 41

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

would replanting occur? Would replanting be a required mitigation measure? To what extent does replanting mitigate the impact of the proposed removals?

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. 41

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? 42

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 an 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. 43

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 44

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.

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. 44

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. 45

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. 45

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). 46

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? 47

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. 48

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. 49

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? 50

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. 51

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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. 52

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 enforceable, thus the word "should" must be replaced with "shall."

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. 53

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."

The CEQA Evaluation fails to address mandatory findings of significance as required by CEQA Guidelines § 15065. 54

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. 55

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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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
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21 East Carrillo Street
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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.

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.

- 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,

T. C

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, Alterative 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 S281was 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 palate 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."

Brownstein Hyatt Farber Schreck, LLP

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.

Brownstein Hyatt Farber Schreck, LLP

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.

Brownstein Hyatt Farber Schreck, LLP

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 mitigaiton for aestetic 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.

Jim Taylor
5563 Calle Ocho
Carpinteria CA 93013
408-666-7356
jim@carpedata.com

May 8, 2012

CalTrans

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.

CARUSO
AFFILIATED

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. 1

Thank you for your consideration.

Sincerely,

Matt Middlebrook
Senior Vice President, Development

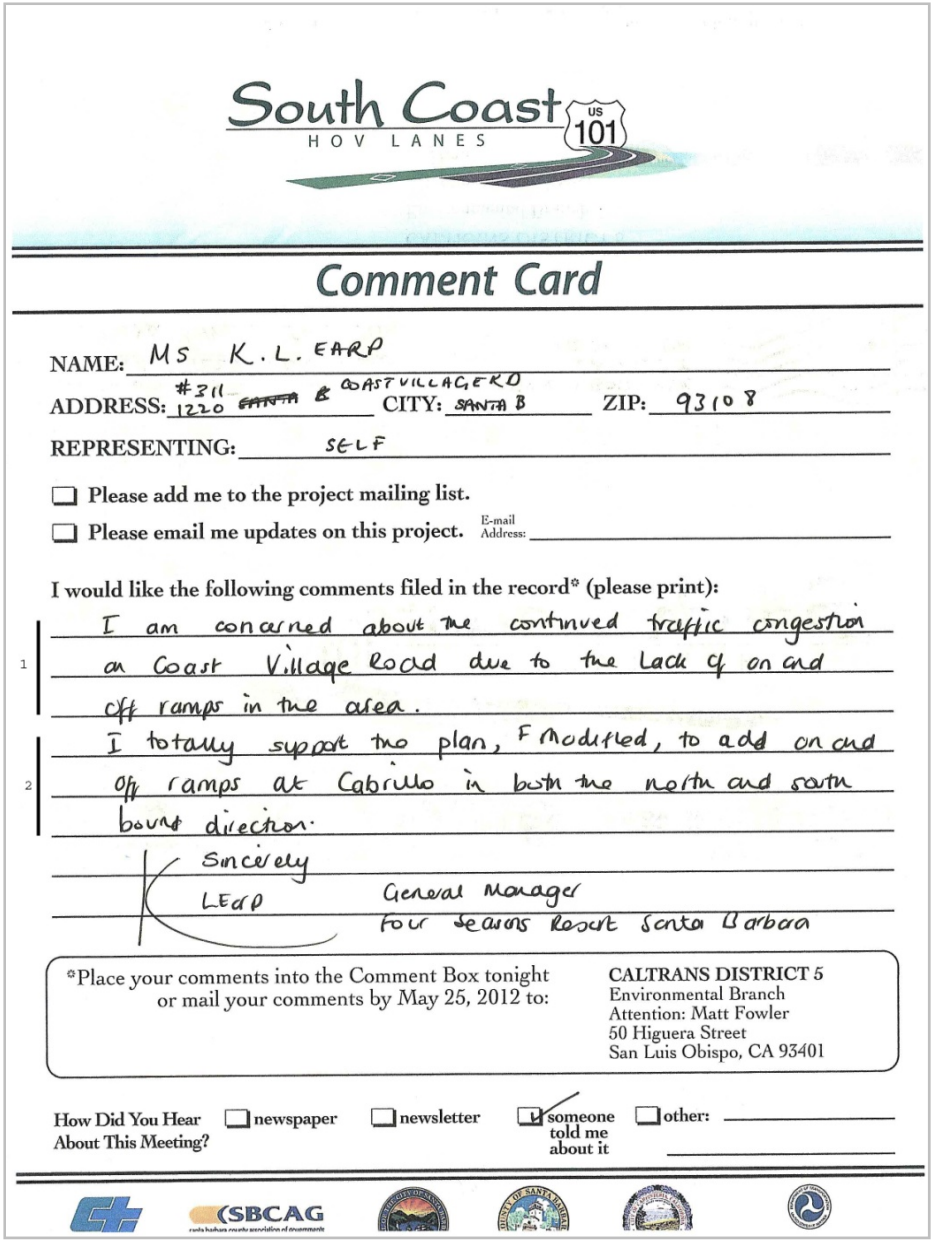
101 THE GROVE DRIVE • LOS ANGELES, CA 90036 • T 323.900.8100 • F 323.900.8101 • WWW.CARUSOAFFILIATED.COM

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.



South Coast HOV LANES US 101

Comment Card

NAME: MS K.L. EARP

ADDRESS: #311 1220 ~~SANTA~~ COASTVILLAGERD 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
LEarp 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:

SBCAG

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. 1

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 2

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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. 2

- 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. 3
- 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. 4
- 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. 5
- 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 6

Mr. Fowler, Caltrans
July 9, 2012
Page 3

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. 6

- 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. 7

- 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 8

[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.
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.

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. 8

- 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 hese 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. 9
- 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 CHYTILO

Marc Chytilo
Ana Citrin

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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.

COAST
COALITION FOR SUSTAINABLE TRANSPORTATION

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Santa Barbara, CA 93120
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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: 2

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. 3

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. 4

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 Andrée Clark Bird Refuge. 5

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. 6

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. 7

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. 8

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 Reprot/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 nose 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

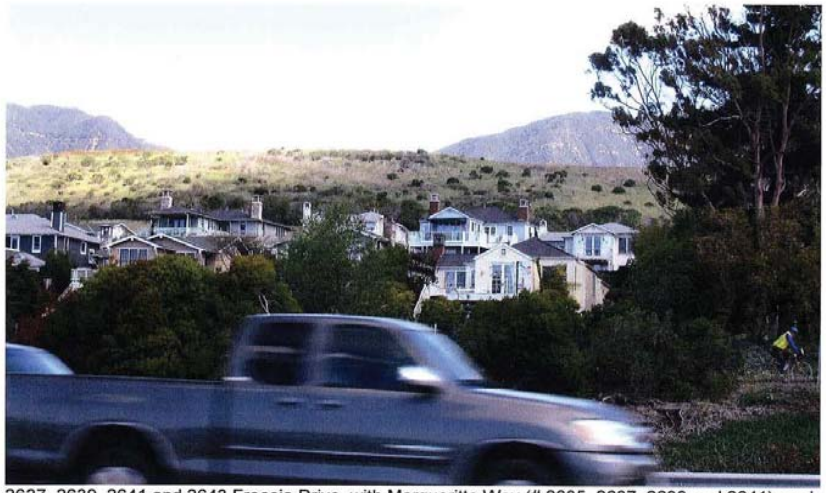
Second Row Homes
The Cottages
Summerland, CA

PHOTOGRAPHIC STUDY

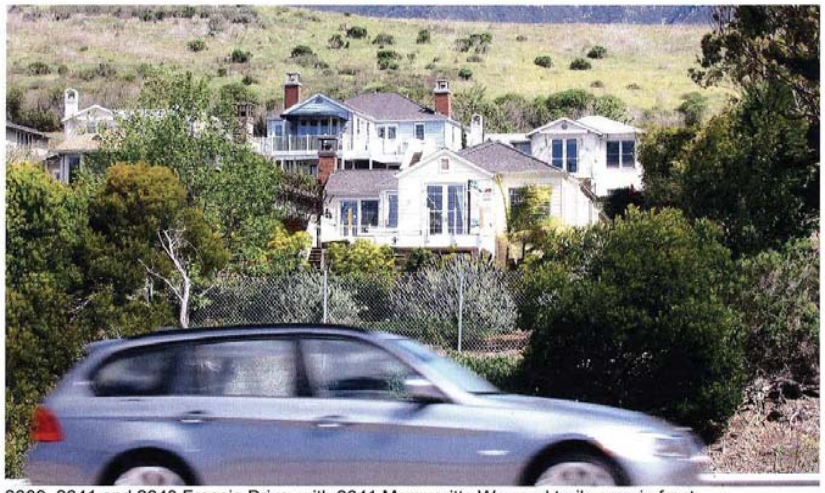
Photographs taken from South side of Highway 101

April 14, 2012

2637, 2639, 2641 and 2643 Freesia Drive, with Margueritte Way (# 2637, 2639 and 2641) and trails area in area in front.



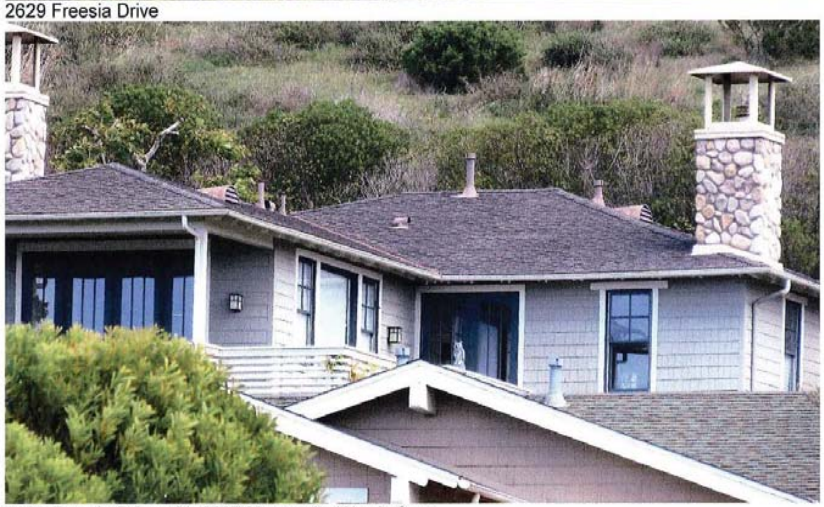
2637, 2639, 2641 and 2643 Freesia Drive, with Margueritte Way (# 2635, 2637, 2639 and 2641), and cyclist on Via Real in front.



2639, 2641 and 2643 Freesia Drive, with 2641 Margueritte Way and trails area in front.

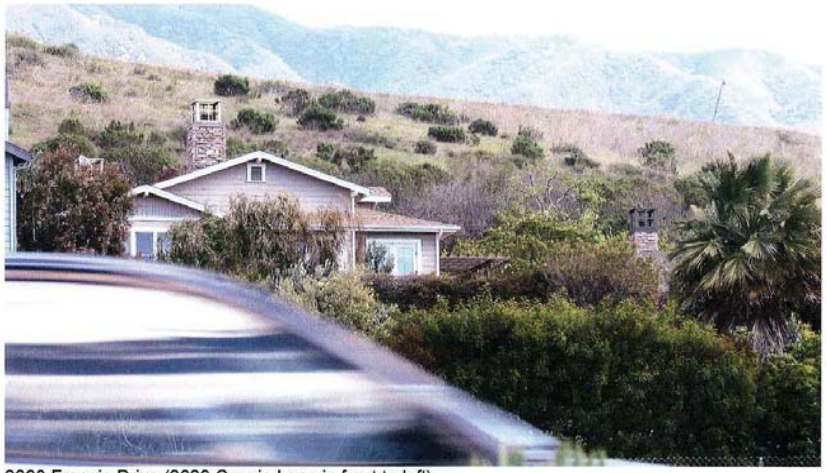
2635 and 2637 Freesia Drive 2629 Caspia Lane in front to left).

2629 Freesia Drive



2629 Freesia Drive with 2637 Marguerite Way in front

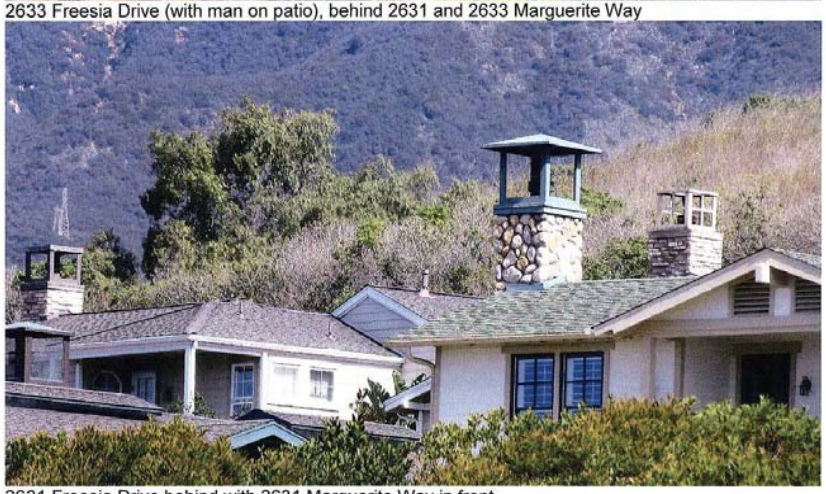
2633 Freesia Drive (2629 Caspia Lane in front to left)



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.

South Coast 101 HOV LANES

RECEIVED MAY 22 REC'D

Comment Card

NAME: Owner:

Donna Benaroya
2621 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: 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 Hiway 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 our 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

Donna Benaroya - Owner of 2621 Caspia Ln. Summerland, CA

How Did You Hear About This Meeting? ☐ newspaper ☐ newsletter ☐ someone told me about it ☑ other: HOA

Caltrans · SBCAG santa barbara county association of governments · US Department of Transportation Federal Highway Administration

South Coast 101 HOV LANES

RECEIVED MAY 21 REC'D

Comment Card

NAME: Owner:

Joseph & Dianne Freeman
2623 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:

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.

Joseph Freeman Dianne Freeman

*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:

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South Coast 101 HOV LANES

RECEIVED MAY 22 REC'D

Comment Card

NAME: John & Janet Holland
516 South Capital Blvd.
Boise, ID 83702

ADDRESS:

REPRESENTING:

☐ Please add me to the project mailing list.

☐ Please email me updates on this project. E-mail Address: JOHNHOLLAND.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 INPUT 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:

Caltrans · SBCAG santa barbara county association of governments · US Department of Transportation Federal Highway Administration

South Coast 101 HOV LANES

RECEIVED MAY - 9 REC'D

Comment Card

NAME: Owner:
Timothy & Marian Howie
2625 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: 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 Oceanview 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 traffic 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:

Caltrans · SBCAG santa barbara county association of governments · US Department of Transportation Federal Highway Administration

South Coast 101 HOV LANES

RECEIVED MAY 18 REC'D

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:

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South Coast 101 HOV LANES

RECEIVED MAY 21 REC'D

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

Caltrans · SBCAG santa barbara county association of governments · US Department of Transportation Federal Highway Administration

South Coast HOV LANES US 101

RECEIVED MAY 22 REC'D

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:

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South Coast HOV LANES US 101

RECEIVED MAY 16 REC'D

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~~ 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

Caltrans · SBCAG santa barbara county association of governments · US Department of Transportation Federal Highway Administration

South Coast US 101 HOV LANES

RECEIVED MAY 16 RECD

Comment Card

NAME: Owner: Jim A. & Sherry Tilton, 2635 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):

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:

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South Coast US 101 HOV LANES

RECEIVED MAY 26 RECD

Comment Card

NAME: Owner: John & Kathryn Taylor, 2637 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):

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:

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South Coast 101 HOV LANES

RECEIVED MAY 18 RECD

Comment Card

NAME: Owner: PAUL CLAY
2639 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: 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:

Caltrans SBCAG santa barbara county association of governments US Department of Transportation Federal Highway Administration

South Coast 101 HOV LANES

Comment Card

NAME: Owner: Robert K Garrison
Brenda Nancarrow-Garrison
2641 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: Brendananc@aol.com Robertkgarrison@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 K Garrison 2641 Freesia Dr
Brenda Nancarrow-Garrison

RECEIVED JUN 26 2012 BY:

*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:

Caltrans SBCAG santa barbara county association of governments US Department of Transportation Federal Highway Administration

South Coast 101 HOV LANES

RECEIVED MAY 15 REC'D

Comment Card

NAME: Owner: Gregg & Dara Bernstein, 2643 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: greggb@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

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South Coast 101 HOV LANES

Comment Card

NAME: Owner: Bree Sommers, 2631 Marguerite Way, Summerland, CA 93067

ADDRESS:

REPRESENTING: Owner

RECEIVED JUN 26 2012 BY:

☑ 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 lot 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

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South Coast 101 HOV LANES

RECEIVED
JUN 26 2012
BY:

Comment Card

NAME: Owner: George H. & Susan K. Frampton, 2633 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: 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

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South Coast 101 HOV LANES

RECEIVED
MAY 22 REC'D

Comment Card

NAME: Owner: Jim & Sheri Copus, 2635 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:

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

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South Coast 101 HOV LANES

RECEIVED MAY 22 RECD

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

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South Coast 101 HOV LANES

RECEIVED MAY 19 RECD

Comment Card

NAME: Owner: Carol F. Marsch, 2639 Marguerite Way, Summerland, CA 93067 — PO 1209 Summerland Ca 93067 Mailing Address

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 in 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. + 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

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South Coast 101 HOV LANES

RECEIVED MAY 15 REC'D

Comment Card

NAME: Owner: Christopher & Kathleen Greco, 2641 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: 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 J 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

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South Coast 101 HOV LANES

RECEIVED MAY 10 REC'D

Comment Card

NAME: Owner: Jose & Veronica Carrillo, 2600 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:

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

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South Coast 101 HOV LANES

Comment Card

NAME: Owner: Katy Bacchilega-SMITH
2604 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:

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

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South Coast 101 HOV LANES

Comment Card

NAME: Owner: Danielle Tervo
2608 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: lifemotion@cox.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

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South Coast 101 HOV LANES

RECEIVED MAY 18 REC'D

Comment Card

NAME: Owner: Eran & Katy Olivas, 2612 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: 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!

RECEIVED JUN 26 2012 BY:

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

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South Coast 101 HOV LANES

Comment Card

NAME: Owner: Salvador Robles Briceno, 2613 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:

I would like the following comments filed in the record* (please print):

I approve of sound wall in front of my house, it gets noisey and can hear all the time.

RECEIVED JUN 26 2012 BY:

Salvador Briceño 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

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South Coast 101 HOV LANES

RECEIVED MAY - 8 REC'D

Comment Card

NAME: Owner: Gwendolyn M. Hall, 2615 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:

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

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Caltrans · SBCAG santa barbara county association of governments · US Department of Transportation Federal Highway Administration

South Coast 101 HOV LANES

Comment Card

NAME: Owner: Shelly Sharp, 2616 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: ssanthro2002@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 developement to keep the noise down.

Shelly Sharp

RECEIVED JUN 26 2012 BY:

RECEIVED MAY - 7 REC'D

*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

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South Coast HOV LANES US 101

Comment Card

NAME: Owner:

Juliette P. Mackey
2617 Caspia Lane
Summerland, CA 93067

ADDRESS:

REPRESENTING: Owner

RECEIVED
JUN 26 2012
BY:

☐ 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):

RECEIVED
JUN 26 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

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South Coast 101 HOV LANES

RECEIVED MAY 15 REC'D

Comment Card

NAME: Owner: Dorene Luken, 2619 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:

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 3 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

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South Coast 101 HOV LANES

RECEIVED MAY - 9 REC'D

Comment Card

NAME: Owner: Alan Conway King, 2620 Caspia Lane, Summerland, CA 93067

ADDRESS:

REPRESENTING: Owner

RECEIVED JUN 26 2012 BY:

☐ Please add me to the project mailing list.

☒ Please email me updates on this project. E-mail Address: RINCONAK@COX.NET

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

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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.

Montecito Association
The voice of our community

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Robertson Short
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Fax (805) 969-4043

info@montecitoassociation.org
www.montecitoassociation.org

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). 1

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. 2

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. 3

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. 4

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. 5

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. 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 7

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.

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.

9

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 Spings project and include data for the Olive Mill, San Ysidro and Sheffield

11

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.

12

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

17

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. 17

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. 18

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. 19

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. 20

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. 21

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. 22

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 23

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. 23

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." 24

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. 25

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. 26

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. 27

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. 28

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: 29

- 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. 29
- 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. 30
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. 31
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. 32

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

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 1.
Expanded Cabrillo/Hot Springs Roundabout
Conceptual Design

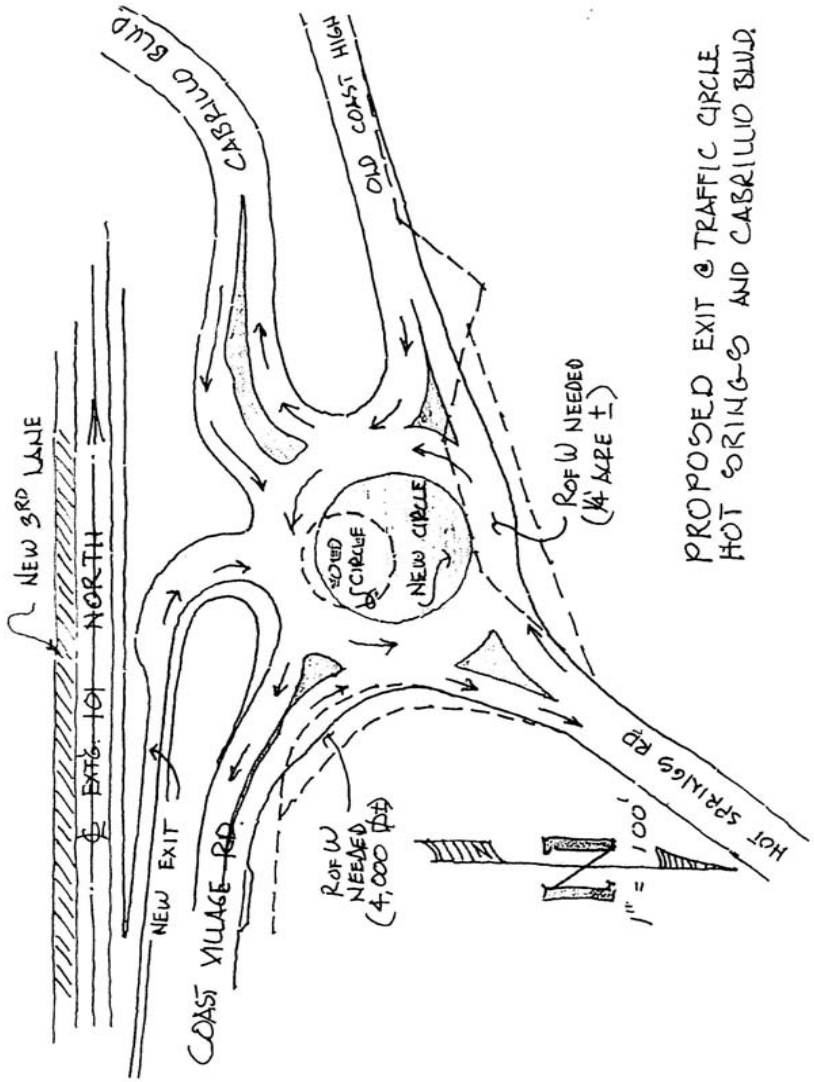

Figure 2.
Cabrillo/Hot Springs Alternative
J-Modified

Figure 3.
San Ysidro Interchange
Conceptual Design

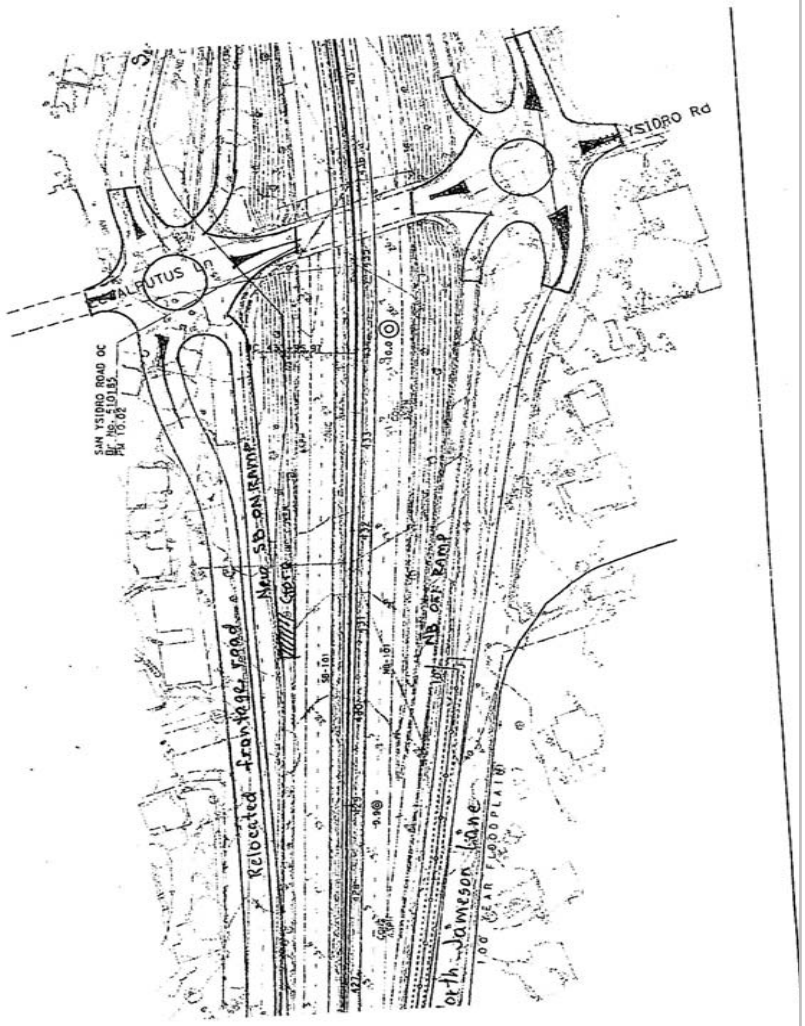

Exhibit B
Ten-Year Accident Data

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 Hermosillo 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.

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 selected configuration would add another northbound off-ramp near the roundabout and satisfy your concerns.

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. 1

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 <joedch1@msn.com>, Ann Richards <annrichards6@gmail.com>, Ed Richards <erichards.rz@gmail.com>, Doralee Jacobson <doraleej@bagelnet.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. 2

- 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. 3

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

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 <joedch1@msn.com>, Joanne Chere <jchere80@gmail.com>, Ed Richards <erichards.rz@gmail.com>, Ann Richards <annrichards6@gmail.com>, Doralee Jacobson <doraleej@bagelnet.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. 1

   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. 2 3

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. 4

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.

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. 5

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 1010 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. 1

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. 2

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. 3

A dedicated bike path connecting Santa Claus Lane to Carpinteria would also enhance safety. 4

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 5

flow on the Lane would be hindered by constuction...

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 to 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-trafficked 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

Louis Almaraz
Village Properties

Cc: Richard Nordlund
Montecito Association

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.

Sam Zodeh
<szodeh@ppplaw.com>
07/09/2012 12:25 PM

To "south.coast.101.hov@dot.ca.gov"
<south.coast.101.hov@dot.ca.gov>
cc
bcc
Subject South Coast 101 HOV Lanes Project; Project ID# 0500000225, Santa Barbara County, Draft EIR/EA ("Project")

Dear Mr. Flower:

I am writing you on behalf of my clients Mr. and Mrs. Peter Sperling, owners of 1745/1755 Fernald Point Lane, Santa Barbara, California ("Property") which is located immediately next to Highway 101. The Sperling's Property will be directly impacted by the substantial additional freeway noise which will be the result of the completion of the above referenced project ("Project").

Unfortunately, the current Project's documents do not adequately provide for effective mitigation of the completed Project's significant noise impacts on the Sperling's Property and those of their neighbors. We respectfully request that the Project be revised to include a Sound Wall in order to effectively mitigate the additional and significant highway noise which will be caused by the completed Project.

Please feel free to contact me with any questions or comments.

Best regards,

Sam

cc: Mr. and Mrs. Peter Sperling

Sam Zodeh
Price Postel & Parma LLP
200 E Carrillo Street, Suite 400, Santa Barbara, CA 93101
805.962.0011 (Main); 805.882-9804 (Direct)
805.965.3978 (Fax)
szodeh@ppplaw.com

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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 Cindy Sage

Orrin Sage and Cindy Sage
1396 Danielson Road
Santa Barbara, CA 93108
(805) 969-0557

SAGE
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.

SAGE
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, PhD
Cindy Sage, MA
Sage Associates, Environmental and Agricultural Consultants

STATE OF CALIFORNIA—BUSINESS AND TRANSPORTATION AGENCY EDMUND G. BROWN JR., Governor

DEPARTMENT OF TRANSPORTATION
P.O. BOX L, 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; Leq of 69 dBA and peak of 80 dBA. At 1433 and 1403 South Jameson Lane the Leq 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 Leq 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
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@rain.org>
07/09/2012 10:09 PM

To <South.Coast.101.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

South.Coast101@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.

1

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, potentiall,y 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.

Christie Boyd
<browndog11@gmail.com>
07/02/2012 09:30 AM
Please respond to
<browndog11@gmail.com>

To <scott.eades@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. 1

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. 2

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. 3

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. 4

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.

1

(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.

2

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.

3

- 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

RECEIVED

APR 30 2012

S.B. COUNTY
PLANNING & DEVELOPMENT
HEARING SUPPORT

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.

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

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. ."

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 meridian 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.

TY WARNER
HOTELS AND RESORTS

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 identity 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.

1

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.

2

3

1180 Channel Drive, Santa Barbara, California 93108 • Telephone (805) 695-8887 • Facsimile (805) 695-0508

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.

4

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
Project Development Manger
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.

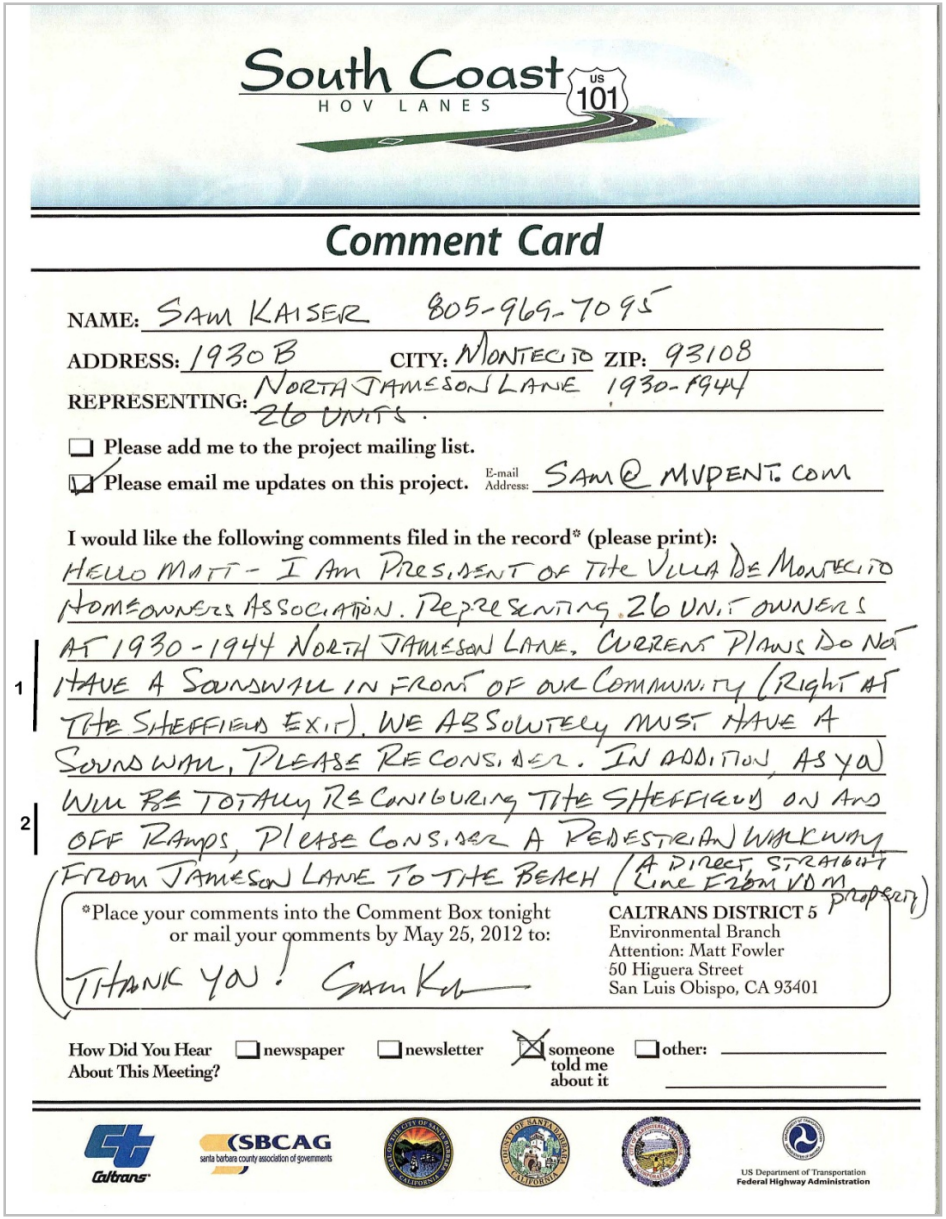
The project was analyzed for mobile source air toxics using Federal Highway Administration's protocol and found to have no meaningful impacts. The purpose of the project is to relieve future congestion, which in turn will reduce traffic emissions associated with idling vehicles. Caltrans Standard Specification 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.



South Coast US 101 HOV LANES

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
1 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
2 WILL BE TOTALLY RECONFIGURING THE SHEFFIELD ON AND OFF RAMPS, 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 K

How Did You Hear About This Meeting? ☐ newspaper ☐ newsletter ☒ someone told me about it ☐ other: _____

Caltrans SBCAG santa barbara county association of governments US Department of Transportation Federal Highway Administration

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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