

## Appendix K Director's Letter to SBCAG Board and Response

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Following the May 16, 2013 meeting of the Santa Barbara County Association of Governments (SBCAG) Board, additional investigation and analysis occurred on the part of the Montecito Association, Caltrans, and SBCAG. This process culminated with the submittal of a letter by Caltrans Director Malcolm Dougherty to SBCAG. A letter was also sent by the District 5 Director to representatives of the Montecito Association. The two letters from Caltrans along with an attached letter from CHP are included. The two letters put to rest several issues relative to dropping any configurations that include left-side ramps. Additionally, a response from SBCAG following its board meeting held January 16, 2014 was sent to Malcolm Dougherty, Director of Caltrans.

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY  
Governor

EDMUND G. BROWN Jr.

**DEPARTMENT OF TRANSPORTATION**

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December 18, 2013

Mr. Dave Kent, President  
Montecito Association  
P.O. Box 5278  
Santa Barbara, CA 93150

Mr. Jack Overall  
101 Community Coalition  
c/o Montecito Association  
P.O. Box 5278  
Santa Barbara, CA 93150

Dear Mr. Kent and Mr. Overall:

The purpose of this letter is to follow up on prior conversations and share the California Department of Transportation's (Caltrans) conclusions on the viability of interchange proposals that retain left-side ramps as part of the South Coast 101 HOV Lanes Project (Project). Our conclusions have come after careful and full consideration of technical information prepared by Caltrans, the Montecito Association, the 101 Community Coalition and others. This letter also communicates Caltrans findings related to documents recently submitted to Caltrans by the 101 Community Coalition (Coalition) in relation to the project and prepared by Mountain Pacific, Inc. These documents include the *Review of Accidents at U.S. 101 Cabrillo/Hot Springs Left-Side Ramps* (September 23, 2013, and related handouts from the November 15, 2013 meeting) and the three *101 Community Coalition Alternative Plan* reports submitted to the Santa Barbara Council of Governments (SBCAG) at the May 16, 2013 Board meeting (*Executive Summary, Sheffield Drive Fact Sheet, and Cabrillo Blvd. Fact Sheet*).

Caltrans has carefully considered a range of options for adding a new lane in each direction between the cities of Carpinteria and Santa Barbara as part of this Project. This includes ample consideration of concepts that would retain the existing left-side ramps by reconstruction of them at the Cabrillo and Sheffield interchanges. The Project team has studied many similar concepts, including six developed by Caltrans and four developed by the Montecito Association (MA) and the Coalition.

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Ultimately, Caltrans has concluded that configurations that reconstruct yet retain left-side ramps would not result in acceptable long-term safety and operational conditions and are not viable or approvable as part of this Project.

Rationale for this conclusion includes:

- SAFETY  
Left-side ramps are inconsistent with modern freeway engineering principles and practices; they contribute to higher than normal unexpected maneuvers, create driver confusion, and compromise safety and operations. In the context of a project that is adding a third lane in each direction, retaining left-side ramps would result in a less-safe condition than replacing left-side ramps with right-side ramps.
- STANDARDS  
Left-side ramps are non-standard, functionally obsolete, and are being systematically removed on freeways nationwide. Left-side ramps are not supported or recommended by national and state highway design standards and guidelines.
- EQUIVALENT IMPACTS  
Due to the amount of work required to reconstruct the existing left-side ramps to correct reduced stopping sight distance and to accommodate the added lanes, there would be no substantive savings in costs, environmental impacts, or construction related impacts associated with these proposals, including the latest Coalition proposal. This is due to interchange specific design constraints (including the location of the Union Pacific Rail Road tracks and adjacent frontage roads), changes required to add a new lane in each direction, the need to address other non-standard features, and the cost for acquiring privately owned property, among other factors. At the Cabrillo interchange, configurations that retain left-side ramps could not physically accommodate a new southbound on-ramp connected directly from Cabrillo Boulevard.

Caltrans has carefully considered the *Review of Accidents at U.S. 101 Cabrillo/Hot Springs Left-Side Ramps* (September 23, 2013), as well as related handouts supplied by the Coalition at the November 15, 2013 meeting. In review of the Coalition accident analyses, Caltrans consulted with our internal accident investigation specialists, and also requested that the California Highway Patrol (CHP) review the analysis. This review was coordinated through CHP Coastal Division Chief, Reginald Chappelle.

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After considerable review, it was determined by both Caltrans and CHP that we were not in agreement with the accident analysis methodology and related conclusions presented by your group. As responsible agencies, Caltrans and CHP are not able to discount documented accidents that occurred in proximity to a left-side ramp in the way that the Coalition's engineering consultant had done. For instance, an accident which involved an "unsafe lane change" or "lack of appropriate signal" cannot be discounted as not related to the left-side ramp condition using the logic that "it could have occurred" at another location.

These and other contributing factors are not mutually exclusive of the left-side ramp conditions nor do they invalidate the accident's relationship with the left-side ramp. The Coalition's analysis does not diminish Caltrans' obligation to recognize all accidents that have occurred in proximity to the left-side ramps in this corridor. Nor would Caltrans or CHP be able to discount future accidents and State and public related risk exposure implications if the left-side ramps were retained without sufficient and compelling justification.

The added lanes that this Project proposes to construct will result in a physically and functionally different freeway than what currently exists. Accident history at the existing interchanges is only one of many other factors that must be considered in the design of a lane addition project. These improvements must provide for long-term safety and operations today and for decades to come, while balancing environmental impacts and Project related costs. When considering expected traffic volumes, Caltrans as the owner and operator of U.S. 101, also has the burden of making design decisions that balance a wide array of stakeholder interests and protect the State and taxpayers from exposure to public risk.

Modern freeway design standards, like building codes, have been developed after decades of experience and are selected to protect public safety. Caltrans approves design exceptions when sufficient and compelling justification exists for doing so, using well established engineering methodologies. Deviations without adequate or appropriate justification would expose the traveling public to less-safe conditions and the State to high levels of public risk.

Caltrans has assessed design exception criteria associated with left-side ramp configurations as part of this Project on multiple occasions. Caltrans has also reviewed the three *101 Community Coalition Alternative Plan (CCAP)* reports submitted to the SBCAG Board at the May 16, 2013 Board meeting (titled *Executive Summary, Sheffield Drive Fact Sheet*, and *Cabrillo Blvd Fact Sheet*). These documents correctly identify

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that each of the left-side ramps contain existing non-standard features such as inadequate acceleration/deceleration length, inadequate weave area, limited stopping sight distance, and that reconstruction of the ramps would be required to correct these deficiencies.

The information presented within the CCAP documents does not have compelling information which would cause us to change our previous conclusions. After thoroughly reviewing these documents, our findings remain consistent with the information we presented at the May 16, 2013, SBCAG board meeting. Sufficient justification does not exist in the context of this Project to approve exceptions to the mandatory standard that requires all ramps to connect to the right of through traffic.

Caltrans recognizes that the MA and Coalition members have dedicated considerable time and energy in the interest of providing the best Project possible. These efforts have resulted in positive Project refinements and we hope to work together in the design phase of the Project to select aesthetic refinements that best fit within the context of the Montecito Community.

Sincerely,



TIMOTHY M. GUBBINS  
District Director

c: Roger Aceves, Chairman, Santa Barbara County Association of Governments  
Steve Lavagnino, Vice Chairman, Santa Barbara County Association of Governments  
Reginald Chappelle, Chief, CHP Coastal Division

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State of California— Transportation Agency

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**DEPARTMENT OF CALIFORNIA HIGHWAY PATROL**

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December 11, 2013

File No.: 701.11709.11503.101 HOV Project.doc

Timothy M. Gubbins, District Director  
Department of Transportation, District 5  
50 Higuera Street  
San Luis Obispo, CA 93401-5415

Dear District Director Gubbins:

I have reviewed the collision assessment prepared by the 101 Community Coalition which was recently provided to our office by Caltrans District 5, and find nothing in the report to support the retention of the left-side ramps as a component of the project which will add a new lane to U.S. 101 in the Santa Barbara corridor. While the California Highway Patrol defers issues relative to roadway engineering and design to the subject matter experts at Caltrans, both agencies share the common vision of facilitating the safe and efficient movement of traffic on the roadways within our jurisdictional responsibility. Our specific role remains to provide the highest quality of safety and service to the motoring public throughout California.

Thank you for allowing us to review the collision analysis provided by the 101 Community Coalition regarding the South Coast 101 HOV Widening Project, and for your unwavering commitment to traffic safety in the design, construction and maintenance of our roadways.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. J. Chappelle".

R. J. CHAPPELLE, Chief  
Coastal Division

cc: Assistant Commissioner, Field

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**DEPARTMENT OF TRANSPORTATION**

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December 19, 2013

The Honorable Roger Aceves  
Chairman, Santa Barbara County Association of Governments  
260 North San Antonio Road, Suite B  
Santa Barbara, CA 93110

Dear Chairman Aceves:

Thank you for the opportunity to present findings from our evaluation of the Montecito Association's Alternative Plan at the May 16, 2013, Santa Barbara County Association of Governments (SBCAG) Board meeting. The California Department of Transportation (Caltrans) has had time to fully consider the Board's requests from that meeting and I have also received a letter from County Supervisor Salud Carbajal, dated September 4, 2013, requesting that I reply to the SBCAG Board. There is an urgent need for congestion relief in this corridor and I appreciate the partnership we have with SBCAG to move this vital project forward. We are now at a critical juncture in the project delivery process when we must have a shared understanding of the next steps to achieve project approval in order to improve mobility along the corridor.

Since the May SBCAG Board meeting, Caltrans has continued to meet with the Montecito Association (MA) and 101 Community Coalition (Coalition) representatives to fully understand their proposal and related accident analysis. After ample consideration of these materials, Caltrans has concluded that configurations that reconstruct yet retain existing left-side ramps would not result in acceptable long-term safety and operational conditions and are not viable or approvable as part of this project. Safety of the motoring public is of the utmost importance to both Caltrans and the California Highway Patrol (CHP) as we evaluate the best transportation improvement strategy.

SBCAG is the primary project sponsor while Caltrans is the lead agency for project approval and compliance with state and federal environmental laws. With respect to these roles, this letter sets forth Caltrans' response to the request the board made for consideration of three points at the May Board meeting.

1. The Board asked that Caltrans re-circulate the Draft Environmental Document (DED) for the project taking into consideration the MA alternative, if necessary.

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Caltrans does not feel that it is necessary to re-circulate the DED in order to completely evaluate the MA proposal. Caltrans has fully considered the proposals presented by the MA. Caltrans believes that the DED for the project (as currently scoped) meets the requirements of the California Environmental Quality Act (CEQA) and the National Environmental Protection Act (NEPA) and that the environmental document can be approved without re-circulation. Our proposal is to proceed with preparation and release of the Final Environmental Document (FED). Under this approach, a preferred alternative would be identified from among those presented in the DED. Some project modifications will be included in response to DED comments received during the public document period as discussed during the May Board meeting. Findings from our evaluation of the 101 Community Coalition Alternative Plan will also be documented in the FED as requested by the SBCAG Board. The project would retain the original alternatives from the DED, including the HOV limits, but there are opportunities to address this item and additional local features on a concurrent path during the coastal permitting process that will occur after certification of the FED as indicated later in this letter. An FED can be certified in approximately seven months, and no additional funding would be required from SBCAG to complete the environmental phase work for the project.

2. The Board asked that Caltrans include the Coalition alternative in the environmental document.

As noted above, Caltrans' analysis of the Coalition alternative plan will be included in the FED. Project alternatives that retain left side ramps are not considered viable and will be identified as fully "considered but rejected" in the FED.

Left side ramps are not consistent with modern engineering standards, do not meet driver expectation, and cannot be retained due to safety and operational reasons. These findings were well documented in our presentation, as well as my testimony at your May 16, 2013 SBCAG Board meeting.

Caltrans' determination that retaining the left-side ramps are infeasible was reached after a thorough analysis which has taken into account many factors including:

- Current state and federal highway design standards
- Driver expectations
- Cost
- Historical accident rates and collision reports at the specific interchanges
- Future safety issues with the 6-lane configuration
- Congestion relief benefits and traffic operational issues.

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Further consideration of the Coalition's documentation and review of corridor specific accident data resulted in the same conclusions. We carefully evaluated their recent accident data analysis in consultation with our internal accident investigation specialists, and also requested that the CHP review the analysis. This review was coordinated through the CHP Coastal Division Chief, Reginald Chappelle, who concurred with Caltrans' assessment. More specific information associated with these conclusions was included in a December 11, 2013 joint letter to the MA and Coalition, which is attached.

Caltrans' determination regarding the infeasibility of the left-side ramps in the project was reached in consultation with Transportation Secretary Brian Kelly. If SBCAG wants to move forward with the project, it should be understood that the left-side ramps are not a viable option.

3. The Board asked that Caltrans modify the start/stop location of the HOV lane south of Sheffield Road.

Shortening the limits of the HOV lane would be inconsistent with the project purpose and the need and project description identified in the SBCAG's adopted 2040 Regional Transportation Plan (RTP). In addition, changing the limits of the HOV lane could significantly reduce the effectiveness of the project long-term in reducing congestion, achieving mode shift, and reducing greenhouse emissions. A careful analysis must be completed before a decision is made to change the limits of the HOV lane. If SBCAG and Caltrans agree, following such an analysis, that changing the HOV limits is appropriate, SBCAG would need to amend its RTP and the environmental document would need to be re-visited to identify the effects of a significant change in the project scope.

Caltrans believes that HOV lanes provide the greatest long-term congestion relief and are consistent with regional and state goals to reduce greenhouse gas (GHG) emissions.

SBCAG's recently adopted RTP, as well as the previous 2030 RTP, clearly plan for HOV lanes to be added between the cities of Carpinteria and Santa Barbara. Plan consistency is especially critical in this corridor based on the 101 in Motion consensus recommendations, the Measure A voter expectations, and the current RTP language calling for HOV lanes within the project limits. These limits will also provide the greatest measure of effectiveness for an HOV lane in this corridor, including the potential for mode shift.

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State law and the Governor's transportation policy all strongly support efforts to combat climate change by reducing GHG emissions. The 101 HOV project is the single most effective strategy for reducing GHG emissions from transportation sources in SBCAG's recently adopted RTP. Reducing the length of the proposed HOV lane by 25% (approximately 6 miles; 3 in each direction) in the most congested part of the corridor will significantly reduce its effectiveness long-term and result in increased miles traveled and greater GHG emissions. This change to the project would be in direct conflict with SB 375 goals and SBCAG's sustainable community strategy.

If the RTP is subsequently modified to change the HOV limits within the corridor, the SBCAG Board could ask Caltrans to evaluate the changes during the design and permitting phase of the project and modify the project as needed. An appropriate level of FED re-evaluation would be performed at that time.

In light of the foregoing, Caltrans proposes to retain the project scope in the FED consistent with SBCAG's RTP and the purpose and need identified in the DED. The features of the project would include those that are essential to adding a new lane in each direction on US 101 within the project limits.

There are a number of other local improvements with merit of their own that are not precluded by the HOV lane project or essential to the stated purpose and need for the HOV lane project. These improvements include, but are not limited to, replacing the railroad crossing over Cabrillo Boulevard, improving the intersections at Olive Mill and Coast Village Road, and reconstructing the San Ysidro Road interchange. These improvements should be undertaken as separate projects, each with an independent purpose and need, a local specific project development team, and an appropriate range of alternatives. Developed separately, coordination between the HOV lane project team and teams working on local projects would occur in the permitting phase of the HOV project, as needed. Possibilities for constructing local features with HOV improvements and related shared funding opportunities could be explored at that time as well. This approach to dealing with local improvements is the fastest and most cost effective approach to delivering the project and congestion relief to motorists along this important corridor.

If the SBCAG Board were to add local improvements such as those mentioned above, it would require revisions, and re-circulating the DED resulting in significant delay to the HOV project. Each individual additional improvement would require the development of a location specific purpose and need, a full range of project alternatives, environmental

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studies to assess impacts, and selection of a preferred alternative. This process would add complexity, time, and funding requirements to the existing HOV project's environmental process. It will likely require an additional 4-5 years to develop community consensus, conduct necessary environmental and design assessments, prepare the DED, circulate it for public review and finalize the document. The environmental phase cost for this additional work is estimated to be \$7 to \$9 million. Escalated capital cost associated with a 4-5 year delay would be considerably more.

On the basis of these considerations, it is Caltrans' intent to proceed with finalizing the environmental document to achieve project approval and provide timely congestion relief in this corridor. Caltrans is also committed to coordinating extensively with local permitting agencies and related design review teams to integrate locally focused landscaping and aesthetic refinements and stage construction plans with local input into the project, as well as working with SBCAG on additional desired local improvements concurrently.

Caltrans awaits your concurrence with this approach. Please communicate directly with District 5 Director, Tim Gubbins. You can reach Tim at 805-548-3127, or by email at [tim.gubbins@dot.ca.gov](mailto:tim.gubbins@dot.ca.gov).

Sincerely,



MALCOLM DOUGHERTY  
Director

cc: Steve Lavagnino, Vice Chairman, Santa Barbara County Association of Governments

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January 27, 2014

Mr. Malcolm Dougherty, Director  
California Department of Transportation  
P.O. Box 942873, MS-49  
Sacramento, CA 94273-0001

Dear Mr. Dougherty:

At its January 16, 2014, meeting, the SBCAG board voted to move forward with the 101 HOV project using the approach proposed in your December 19 letter to the Chair. Our concurrence with Caltrans' approach for moving the 101 project forward is based on the following understanding of the proposal:

- The scope of the project as identified in the draft EIR will be retained;
- Caltrans has made the determination that project alternatives that retain left-side ramps are not viable and that in the final EIR Caltrans will identify these alternatives as "considered but rejected";
- The original limits of the HOV lanes will be retained consistent with the project description in the draft EIR and SBCAG's adopted 2040 Regional Transportation Plan;
- Local improvements not included in the project description will be undertaken as separate projects from the 101 HOV project; and
- Caltrans will not recirculate the draft EIR and will proceed with preparing and releasing the final EIR as soon as possible.

SBCAG intends to work with the affected jurisdictions on local improvements at the Cabrillo UPRR bridge, Coast Village Road/Olive Mill intersection and 101/San Ysidro Road interchange concurrently and on a parallel path with the 101 HOV project.

SBCAG requests that Caltrans cooperate in hiring an independent firm to assist in the development of the final design for the 101 project. We believe that this assistance will facilitate better communication and understanding for all stakeholders and result in a project that achieves shared project goals for congestion relief, improved safety while minimizing costs, delays and community disruption.

Relieving daily congestion on the 101 corridor is an urgent need and completing the 101 HOV project is the highest priority transportation improvement project in our region. The project will provide increased capacity on a highway of importance to the state and the nation. SBCAG is

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making a significant investment of \$140 million in Measure A local sales tax revenues to help complete the 101 HOV project.

I want to thank you and Secretary Kelly for the investment of time and effort to address the concerns and requests of the SBCAG board. We look forward to strengthening our partnership with Caltrans to deliver this critical project.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Lavagnino". The signature is fluid and cursive, with the first name "Steve" being more prominent.

Steve Lavagnino  
Chair, SBCAG

cc: Tim Gubbins  
Senator Hannah Beth Jackson  
Assemblymember Das Williams  
Secretary Brian Kelly  
SBCAG Board Members

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