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RECEIVED
SEP 20 2012
1ST DISTRICT OFFICE

September 18, 2012

Supervisor Janet Wolf
County of Santa Barbara
105 E. Anapamu Street
Santa Barbara, CA 93101

Re: Towbes Foothill Centre/ Sansum Clinic Proposal/ Traffic Safety Hazards
Cieneguitas Reorganization: Annexation to City of Santa Barbara(LAFCO 12-4)

Dear Supervisor Wolf -

This letter is to request that you act to delay LAFCO approval for annexation of the Foothill Centre property, into the City of Santa Barbara, until suitable arrangements can be made for adequate traffic control at the State Route 154 northbound exit to Foothill Road/Cathedral Oaks.

Existing Conditions:

We live in Rancho San Antonio, a development of 100 homes above Cathedral Oaks, about $\frac{3}{4}$ mile west of the subject intersection. Other neighborhoods similarly impacted by the subject project include the Shadow Hills and Via Chaparral neighborhoods, Rancho Santa Barbara, and the other San Antonio Creek neighborhoods, as well as the County Fire Emergency Center and the Alpha Center.

When we return home from Santa Barbara, we take 154 northbound, exit at Foothill/Cathedral Oaks, and turn left. It is difficult under existing conditions to make this turn, because the intersection has very poor sight distance. The problem is that the intersection is not a 90 degree configuration. To see what is coming from the Foothill/Cieneguitas intersection, one must turn about 130 degrees. For those of us without eyes in the back of our heads, it is very hard to tell what's coming from the east without pulling into the middle of Foothill. I am attaching an aerial photo showing this intersection. Often there are multiple cars stuck in the

middle of Foothill attempting to complete this left turn.

Project Traffic:

Santa Barbara City Planner Allison DeBusk told me the subject project is expected to generate 1,208 Average Daily Trips (ADT). This is equivalent to building 120 new single family homes on the property, except that the project traffic will be compressed into daytime hours.

The project consists of approximately 60,000 square feet of new buildings intended to house a medical clinic and outpatient surgery center to be operated by Sansum Clinic, together with administrative offices. This property previously had a gas station, and is still undergoing soil remediation.

The project design would direct all of the 1,208 ADT onto Cieneguitas northbound, where the majority of the medical clinic users would turn left onto Foothill, and a majority of those would turn left onto 154 heading towards 101. Obviously this turns a very rural intersection into something quite different. I am seriously concerned about traffic safety.

Traffic Safety Hazards:

Those of us turning left from 154 onto Cathedral Oaks have more to worry about than poor sight distance, preventing us from seeing what is coming from Foothill/Cieneguitas. We also have the speeding traffic proceeding east towards Santa Barbara on Cathedral Oaks. The posted speed limit is 45 mph, but the traffic moves much faster than this. The County or CalTrans frequently have mobile speed monitoring devices in place on Cathedral Oaks, which display motorist speeds, but these have little effect in slowing these drivers.

Speed causes accidents, and especially differential speed causes accidents. Under existing conditions we must consider bicyclists who now frequent Cathedral Oaks, of course moving more slowly. If we add project traffic, which will consist of medical and surgical patients, arguably an impaired bunch of drivers, it isn't hard to see the increased risk of accidents.

Our neighborhood conducted an online survey of residents' reactions to the project, and the vast majority of those responding had a significant concern over traffic safety, and held the view that the project traffic would make a real difference, making the area substantially less safe.

CEQA Traffic Significance Thresholds:

Project traffic impacts were assessed by an Associated Transportation Engineers (ATE) Traffic Study. Based on this Traffic Study, the City prepared a Negative Declaration, finding that traffic impacts, as well as all other impacts, were below the Thresholds of Significance, so that no mitigation was required.

The Traffic Study states (pp. 9-10) that City impact thresholds (used to determine whether an impact is significant) were applied to intersections within the City and that Santa Barbara County impact thresholds were applied to intersections within the County.

The Foothill/Cieneguitas intersection, which is already signalized, would be in the City of Santa Barbara, upon LAFCO approval of the annexation. The 154/Cathedral Oaks /Foothill intersection, which has only a one-way stop sign at the exit from 154, would remain in the County.

Santa Barbara County's California Environmental Quality Act (CEQA) thresholds require a finding of significance if:

“B. The project's access to a major road or arterial road would require access that would create an unsafe situation...” (or)

C. The project adds traffic to a roadway that has design features (e.g., narrow width, roadside ditches, sharp curves, poor sight distance, inadequate pavement structure) that would become a potential safety problem with the addition of project traffic.” (emphasis added.)

The Environmental Document is Inadequate:

The problem with the Negative Declaration is that the ATE Traffic Study quoted verbatim the above-quoted sections from the County CEQA Thresholds Manual regarding traffic safety, but stopped there. The Traffic Study contains not one word of analysis on the question of whether the design features of this roadway “would become a potential safety problem within the addition of project traffic.”

Coordination by the City and County is Necessary to Reduce the Traffic Safety Impacts of the Project.

This project cleverly sweeps the Foothill Triangle into the City, which allows development of the property to go ahead without paying a penny of traffic

mitigation fees. If this project were subject to planning and development review by the County, Traffic Mitigation Fees would be required, and these could be used to pay for the costs of adequate traffic control. As is now proposed by the annexation, the County will retain in its jurisdiction the 154/Foothill intersection, with its dangerous condition and potential liability. Those of us living nearby in the County will receive reduced traffic safety and permanently increased risk of traffic injuries.

You should act to require the developer to provide the necessary traffic controls at 154/Foothill. As members of LAFCO, you are required to consider the effect of the proposed annexation on adjacent areas, and the cost and adequacy of governmental controls in the annexation area and adjacent areas. This is the time for the County to consider the costs of restoring this intersection to a safe condition, including the addition of the project's Sansum Clinic traffic.

A Traffic Circle Should be Considered as one Cost Effective Means of Controlling this Intersection.

A small traffic circle could probably be constructed within existing right of way, on Foothill at the base of the 154 exit, at modest cost. It could allow all users, including the new medical and surgical patients, existing drivers and cyclists on Cathedral Oaks and Foothill, and those of us trying to turn left at this intersection, to each make our way safely to our destinations.

CalTrans supports the idea of a traffic circle, but says the funds for it would have to come from the County, the City, and SBCAG. (tel conf Chris Schaeffer, CalTrans District 5.)

It is time for you to request the County Traffic Engineer to provide you with an analysis of the cost and feasibility of such a traffic circle. No traffic engineer has done so.

The City was not interested, because the ATE Traffic Study found no significant traffic impact (without a word of analysis regarding traffic safety), and because the City will receive no Traffic Impact Fees from the project.

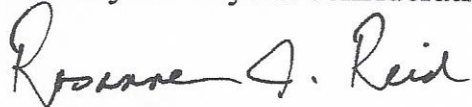
CalTrans has no mandate to look forward. They only approve signalization or other traffic control after a certain number of traffic injuries and fatalities have occurred. (A 92-year old woman who died as a pedestrian trying to cross Foothill was the "warrant" who led to the fairly new signal at Foothill and Cieneguitas.)

However, unlike CalTrans, the County does have the statutory obligation to look forward. LAFCO can only approve the annexation if it has an adequate environmental document. The document must analyze in good faith whether, under County's CEQA Thresholds Manual, "The project adds traffic to a roadway that has design features (e.g., narrow width, roadside ditches, sharp curves, poor sight distance, inadequate pavement structure) that would become a potential safety problem with the addition of project traffic."

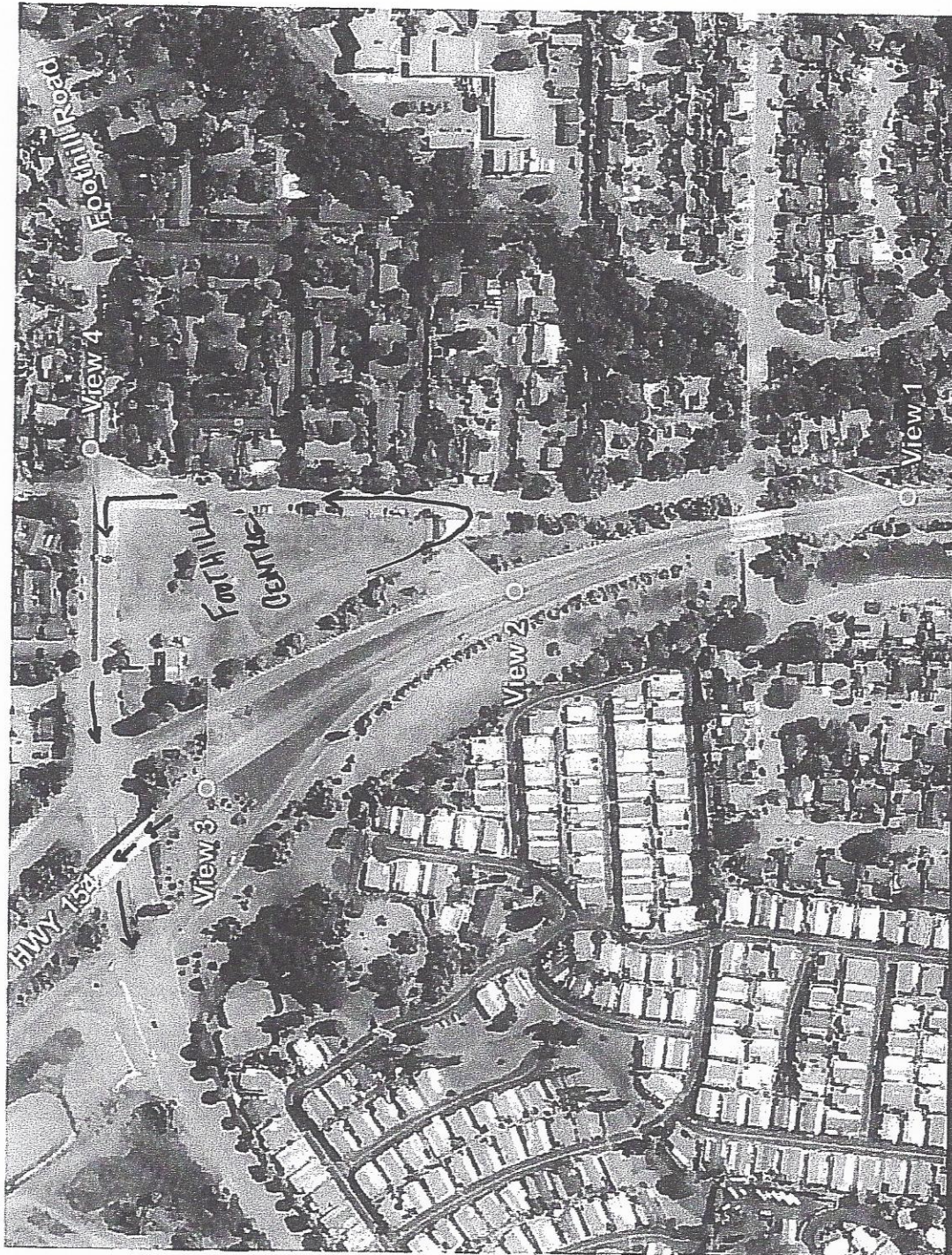
Unless you take the time to make suitable arrangements for traffic control at the 154/Foothill/Cathedral Oaks exit, all of us in this area will bear the consequences as long as we live here.

Mr. Towbes is loved by many in Santa Barbara for all he has done to improve the community. His Sansum Clinic project will create a place of healing for many. Certainly he would not want his legacy for those of us in this area of Santa Barbara to be traffic injuries and deaths.

Thank you for your consideration,

A handwritten signature in cursive script that reads "Rosanne J. Reid". The signature is written in dark ink and is positioned above the printed name.

Rosanne Reid
encl



Foothill Centre • The Towbes Group • 12-7-09 • Map - Photo Simulation Locations

City of Santa Barbara Thresholds

Project-Specific Threshold

The City's project-specific impact threshold states that if a development project would cause the V/C ratio at an intersection to exceed 0.77, or if the project would increase the V/C ratio at intersections which already exceed 0.77 by 0.01, the project's impact is considered significant. For unsignalized intersections, an average delay of 22 seconds per vehicle is considered to be the minimum standard and a significant impact is considered to have occurred if a project increases the amount of traffic traveling through an intersection by greater than one percent (0.01).

Cumulative Threshold

The City's cumulative impact threshold states that if a development project would add traffic to an intersection which is forecast to operate above V/C 0.77 with cumulative traffic volumes, the project's contribution is considered a significant cumulative impact.

Santa Barbara County Thresholds

Significant Adverse Impacts

- A. If the addition of project traffic to an intersection increases the volume to capacity (V/C) ratio by the values provided in the following table, the impact is considered significant.

Significant Changes in Levels of Service	
Intersection Level of Service (Including Project)	Increase in V/C or Trips Greater Than
LOS A	0.20
LOS B	0.15
LOS C	0.10
LOS D	15 Trips
LOS E	10 Trips
LOS F	5 Trips

- B. The project's access to a major road or arterial road would require access that would create an unsafe situation, a new traffic signal or major revisions to an existing traffic signal.
- C. The project adds traffic to a roadway that has design features (e.g., narrow width, road-side ditches, sharp curves, poor sight distance, inadequate pavement structure) that would become a potential safety problem with the addition of project traffic.



City of Santa Barbara
Community Development Department

www.SantaBarbaraCA.gov

October 16, 2012

Bob Braitman
Executive Officer
Santa Barbara LAFCO
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630 Garden Street

PO Box 1990

Santa Barbara, CA

93102-1990

Subject: Proposed Cieneguitas Reorganization; Response to letter from Rosanne and James Reid

Dear Mr. Braitman:

Please accept this letter as a response to the letter submitted to Supervisor Wolf by Rosanne and James Reid with regard to traffic safety at the intersection of Foothill Road/154 northbound exit.

Environmental Issues

The Reid letter references the Traffic Study prepared by Associated Transportation Engineers (dated November 11, 2011, and attached as Exhibit 8 of the previously distributed Mitigated Negative Declaration (MND)), and states that it does not adequately address California Environmental Quality Act (CEQA) thresholds related to analysis of safety. This required analysis is, however, included in the MND/Initial Study prepared for the project by the City. For reference, I've attached the Transportation/Circulation Section of the Initial Study (Attachment 1). In it, hazards, access and safety as they relate to the proposed development of the Foothill Centre at 4151 Foothill Road and 681 Cieneguitas Road are analyzed. The conclusion is that impacts would be less than significant. I've also attached a copy of the Response to Comments document (Attachment 2) that includes responses to comments submitted during the public review period of the draft MND, including comments from Caltrans and the County of Santa Barbara related to traffic. The MND was adopted by the City Planning Commission on June 21, 2012 in support of their actions to approve the project.

As identified in the MND, the project would add trips to Foothill and Cathedral Oaks Roads and State Route (SR) 154. However, these additional trips do not result in project-specific or cumulative impacts relative to traffic or circulation. Please refer to the Traffic Study prepared by Associated Transportation Engineers for specifics on trip distribution and project-added trips to the circulation system (Exhibit 8 of the previously distributed MND). Safety was considered in this review.

With regard to sight distance, the SR 154 northbound ramp at Foothill Road complies with Caltrans Highway Design Manual standards for intersections of this type. The City's Supervising Transportation Engineer Derrick Bailey conducted a site visit and determined that the Caltrans intersection meets the Caltrans sight distance standard of 385 feet for this section of Foothill Road, posted at 35 mph. Sight distance would also be increased with the removal

Exhibit H

of the existing security fence. Because no roadway design defects were observed, no new design components are suggested to be included as part of the environmental document or project.

An analysis of accidents at this intersection shows that there are no significant traffic safety problems at the interchange. Attachment 3 provides a comprehensive response from Associated Transportation Engineers, the traffic consultant for the project, and includes accident data for the intersection.

It should be noted that all added trips are the result of development of the site rather than the proposed Reorganization (annexation to the City of Santa Barbara and detachment from applicable special districts). Based on the conclusions of the MND, the project does not result in project-specific or cumulative transportation impacts; therefore, there is no nexus to require specific mitigation to improve area intersections.

Other Issues

To clarify/correct a statement in the letter, the requested annexation would not change the jurisdiction of the Foothill/Cieneguitas Road intersection. Current City limits include Cieneguitas Road to the Foothill Road right-of-way, but do not include the intersection itself. The proposed annexation would not change that boundary, and the intersection would remain in the County's jurisdiction. Further, the Foothill/Cieneguitas intersection is a Caltrans owned and operated intersection, regardless of jurisdictional boundary, and neither the City nor the County may make any changes to it without Caltrans approval. Additionally, the SR 154/Foothill/Cathedral Oaks interchange is a Caltrans facility, and even though it is located entirely within County jurisdiction, the County does not have the ability to make any changes to that intersection without Caltrans approval.

As noted above, Caltrans has jurisdiction over the Foothill Road right-of-way, and will be responsible for issuing permits for improvements within this right-of-way (via an encroachment permit). Visibility from the SR 154 northbound off-ramp at Foothill/Cathedral Oaks will be considered as part of that encroachment permit review. As an example, Caltrans required that the location of the street trees along Foothill Road be moved from their current location near the street to the back of sidewalk in order to ensure adequate sight distance from Cieneguitas Road.

It is true that the City does not have a fee mitigation program, and therefore the project will not pay any traffic mitigation fees to the city of Santa Barbara if the annexation is approved by LAFCO and the Foothill Centre development project is constructed.

In conclusion, the City determined that increased traffic resulting from development of the project site is not anticipated to result in significant impacts to safety or circulation at the State Route 154 northbound exit to Foothill/Cathedral Oaks Road.

If you have any questions, please contact me at the City Planning Division (805) 564-5470, ext. 4552.

Sincerely,



Allison De Busk
Project Planner

Attachments:

1. Excerpt from Initial Study (Section 11 Transportation/Circulation)
2. Responses to Comments (Exhibit 12 of MND/Initial Study)
3. Letter from Associated Transportation Engineers dated October 16, 2012 responding to comments from Ms. Reid

Cc: By e-mail

Paul Casey, Assistant City Administrator/Community Development Director
Danny Kato, Senior Planner
Steve Fort, Suzanne Elledge Planning & Permitting Services
Michael Towbes, The Towbes Group, Inc.
Craig Minus, The Towbes Group, Inc.
Chris Schaeffer, Caltrans District 5

11. TRANSPORTATION/CIRCULATION Could the project result in:	NO	YES <i>Level of Significance</i>
a) Increased vehicle trips?		Less Than Significant
b) Hazards to safety from design features (e.g. sharp curves, inadequate sight distance or dangerous intersections)?		Less Than Significant
c) Inadequate emergency access or access to nearby uses?		Less Than Significant
d) Decreased performance or safety of pedestrian, bicycle, or public transit facilities?		Less Than Significant
e) Conflicts with adopted policies, plans, programs, or ordinances regarding congestion management and the circulation system, taking into account all modes of transportation.		Less Than Significant

Transportation - Discussion

Issues: Transportation issues include traffic, access, circulation and safety. Vehicle, bicycle and pedestrian, and transit modes of transportation are all considered, as well as emergency vehicle access. The City General Plan Circulation Element contains policies addressing circulation and traffic in the City.

Impact Evaluation Guidelines: A proposed project may have a significant impact on traffic and circulation if it would:

Vehicle Traffic

- Cause an increase in traffic that is substantial in relation to the existing traffic load and street system capacity (see traffic thresholds below).
- Cause insufficiency in the transit system.
- Conflict with the Congestion Management Plan (CMP) or Circulation Element or other adopted plan or policy pertaining to vehicle or transit systems.

Circulation and Traffic Safety

- Create potential hazards due to addition of traffic to a roadway that has design features (e.g., narrow width, roadside ditches, sharp curves, poor sight distance, inadequate pavement structure) or that supports uses that would be incompatible with substantial increases in traffic.
- Diminish or reduce effectiveness, adequacy, or safety of pedestrian, bicycle, or public transit circulation.
- Result in inadequate emergency access on-site or to nearby uses.
- Conflict with regional and local plans, policies, or ordinances regarding the circulation system, including all modes of transportation (vehicle, pedestrian, bicycle, and public transportation).

Vehicle Traffic Thresholds of Significance: The City uses Levels of Service (LOS) “A” through “F” to describe operating conditions at signalized intersections in terms of volume-to-capacity (V/C) ratios, with LOS A (0.50-0.60 V/C) representing free flowing conditions and LOS F (0.90+ V/C) describing conditions of substantial delay. The City General Plan Circulation Element establishes the goal for City intersections to not exceed LOS C (0.70-0.80 V/C).

For purposes of environmental assessment, LOS C at 0.77 V/C is the threshold Level of Service against which impacts are measured. An intersection is considered “impacted” if the volume to capacity ratio is .77 V/C or greater.

Project-Specific Significant Impact: A project-specific significant impact results when:

- (a) Project peak-hour traffic would cause a signalized intersection to exceed 0.77 V/C, or
- (b) The V/C of an intersection already exceeding 0.77 V/C would be increased by 0.01 (1%) or more as a result of project peak-hour traffic.

For non-signalized intersections, delay-time methodology is utilized in evaluating impacts.

Significant Cumulative Contribution: A project would result in a significant contribution to cumulative traffic impacts when:

- (a) Project peak-hour traffic together with other cumulative traffic from existing and reasonably foreseeable pending projects would cause an intersection to exceed 0.77 V/C, or
- (b) Project would contribute traffic to an intersection already exceeding 0.77 V/C.

Transportation – Existing Conditions and Project Impacts

11.a) Traffic

Long-Term Traffic

A Traffic, Circulation and Parking Study was prepared for the Foothill Centre development project by Associated Transportation Engineers, dated November 14, 2011 (*Exhibit 8 – Traffic, Circulation and Parking Study*). The report is summarized below and incorporated herein by reference. All of the intersections located in the vicinity of the project site currently operate at a Level of Service (LOS) A or B. The Traffic Study concludes that the Foothill Centre development project would generate a net traffic increase of 1,208 average daily trips (ADT), 242 A.M. peak hour trips (PHT), and 189 P.M. PHT. When distributed to the surrounding street system, the Foothill Centre development project would result in a *less than significant* project-specific and cumulative impact because intersection LOS would not be significantly impacted.

The Traffic Study acknowledges that there is a spike in traffic within the Foothill Road corridor related to the beginning of classes at La Colina Jr. High School. This traffic peak occurs for a 15-20 minute period and then returns to more evenly distributed traffic flows. Therefore, this traffic peak does not cause area intersections to operate at unacceptable levels per LOS calculations.

Short-Term Construction Traffic

The overall project construction process is estimated to last approximately 13 months. This would include grading for site preparation over approximately 4 months, and construction duration of approximately 9 months. Grading processes would involve up to 33 workers per day, and construction could require up to a maximum of 117 workers on site on occasion. Working hours during the construction process are proposed to be 7 a.m. – 5 p.m. weekdays excluding holidays. Staging, equipment, materials storage, and temporary construction worker parking would occur on-site.

The project would generate construction-related traffic that would occur over the ~~ten~~ 13-month construction period and would vary depending on the stage of construction. Temporary construction traffic is generally considered an adverse but not significant impact. In this case, given traffic levels in the area and the duration of the construction process, short-term construction-related traffic would be a *less than significant* impact. Standard conditions of approval would be applied, including restrictions on the hours permitted for construction trips outside of peak traffic hours, approval of routes for construction traffic, and designation of specific construction staging and parking areas (refer to *Exhibit 2*).

11.b and c) Access/ Circulation/ Safety Hazards

Cieneguitas Road is a two-lane street that is not fully improved along the project frontage. The property frontage currently has three curb cuts along Cieneguitas Road, one located approximately 35 feet north of the southern property boundary, one located approximately 100 feet from the northern property boundary at Foothill Road, and a third curb cut located approximately 20 feet from the intersection of Foothill and Cieneguitas Roads. The southernmost driveway would remain to serve the Veterinary Hospital. The other two curb cuts would be removed and two new curb cuts and associated driveways would be located approximately 180 and 580 feet south of the northern property boundary at Foothill Road. These two new/replacement driveways would provide all vehicular access to the Foothill Centre development. The new driveways have been designed to provide adequate sight distance to and from the intersection of the driveway with Cieneguitas Road.

The project includes construction of formal curb, gutter, sidewalk and parkway within the Cieneguitas right-of-way, including widening the existing roadway and providing formalized on-street parking on the western side of the road. The project also includes extension of the existing northbound left-turn pocket at the Foothill Road/Cieneguitas Road intersection from 50 feet to 125 feet in length. This re-striping is intended to accommodate the increased northbound left-turn volumes associated with the Foothill Centre development in order to prevent congestion along Cieneguitas Road. The 125-foot left turn lane, with a 60-foot bay taper, would allow the left turn lane to transition back to the centerline of

Cieneguitas without conflicting with the project site's northerly driveway. The new sidewalk would be six feet wide behind a six-foot wide parkway, consistent with the City's Pedestrian Master Plan.

Foothill Road (SR 192) is a two-lane State highway that is fully improved (curb, gutter, sidewalk) along the project frontage. The project includes re-construction of formal curb, gutter, sidewalk and parkway within the Foothill Road right-of-way. These improvements would not change the existing roadway alignment or lane configuration. However, striping changes are proposed to create a bike lane within the existing eastbound traffic lane. The property frontage on Foothill Road currently has four curb cuts. These four curb cuts would be removed and no vehicular access would be provided from Foothill Road. Accordingly, the existing westbound left turn arrows painted in the two-way left turn lane would be removed. The sidewalk along Foothill Road would be widened to twelve feet and would include tree wells with grates and new street trees, consistent with the City's Pedestrian Master Plan. All proposed improvements within the Foothill Road right-of-way will require review and approval by Caltrans.

The project site is located in an urbanized area and there are no incompatible uses that would result in a vehicle mix that could increase traffic hazards. The City Fire Department has determined that adequate emergency and fire access is provided for the project. Therefore, proposed project impacts associated with vehicular access, circulation and evacuation related to the new driveway location and access to and from the new development would be *less than significant* because it has been reviewed and found adequate by the City's Public Works, Engineering and Transportation Divisions, and Fire Department.

11.d) Bicycle/Pedestrian/Public Transit

A transit stop exists along the site's Foothill Road frontage. This transit stop is anticipated to provide adequate transit resources for the project demands. A new bus shelter would be provided as part of the Foothill Centre development to improve the usability of this transit stop. MTD's Line 10 (La Cumbre/State to Camino Real Marketplace) serves the area with hourly buses. There is also a school booster transit stop on the Cieneguitas frontage, which would be relocated approximately 240 feet to the south to better accommodate vehicles entering and exiting the project site. On-street bike lanes (Class II) in the area exist on Cathedral Oaks Road, State Street, La Cumbre Road and Hope Avenue, and a Class III bike lane is provided on Cieneguitas Road. There is also an existing off-street multi-purpose path that runs from Cieneguitas and Primavera Roads to Calle Real. The project ~~would~~ proposes to install a Class II bike lane (8 feet in width) along the eastbound side of Foothill Road from the Hwy 154 NB offramp to the intersection of Foothill and Cieneguitas Roads (subject to Caltrans approval).

There is existing sidewalk with tree wells along the project's Foothill Road frontage that would be improved and widened to provide a twelve-foot wide sidewalk with tree wells to serve the area's pedestrian needs (subject to Caltrans approval). A new six-foot wide sidewalk and six-foot wide parkway would be installed along Cieneguitas Road to serve the area's pedestrian needs. Pedestrians and bicyclists would continue to share the existing right-of-way, and these facilities would be improved as a result of the project. Project impacts associated with pedestrian, bicycle or public transit facilities would be *less than significant* because the new medical office development would not result in a substantial increase in the need for new transit facilities, bike lanes or sidewalks in the area, and the project is providing new and/or improved pedestrian and bike facilities on Foothill and Cieneguitas Roads.

11.e) Congestion Management

The Foothill Centre development project would also comply with the Santa Barbara County Association of Government's Congestion Management Program for the region, as analyzed in the Traffic Study. The project involves construction of a medical office development in an area surrounded by residential uses. The project site would have direct access from a public street and would not conflict with or impede implementation of any policies, plans, programs, or ordinances regarding congestion management and the circulation system, taking into account all modes of transportation. Therefore, there would be a *less than significant* impact to congestion management and the circulation system.

Transportation – Mitigation

No mitigation is required. Refer to *Exhibit 2* for Standard Conditions of Approval Applicable to Project.

Transportation – Residual Impact

Less than significant.

4151 FOOTHILL ROAD, 675 AND 681 CIENEGUITAS ROAD
FINAL MITIGATED NEGATIVE DECLARATION
RESPONSE TO COMMENTS

JUNE 11, 2012

INTRODUCTION:

An Initial Study was prepared for the 4151 Foothill Road, 675 Cieneguitas Road and 681 Cieneguitas Road project because the California Environmental Quality Act (CEQA) requires that an environmental assessment of the proposed project be provided. The Environmental Analyst found that, although the proposed project could potentially have significant adverse impacts related to Hazards, mitigation measures described in the Initial Study and agreed to by the applicant would reduce potential impacts to less than significant levels. In addition, recommended mitigation measures were identified to reduce less than significant impacts associated with Biological Resources, Geophysical Conditions and Noise.

A Draft Mitigated Negative Declaration (MND) was prepared for the proposed project, and a public review period was held from April 4, 2012 to May 4, 2012. Comment letters were received from the following public agencies and members of the public during the comment period:

1. Chris Schaeffer, Caltrans District 5
2. Carly Wilburton, Santa Barbara County Air Pollution Control District (APCD)
3. County of Santa Barbara
 - a. Planning and Development
 - b. Fire Department
 - c. Public Works Department
4. Steve Fort, Suzanne Elledge Planning & Permitting Services

Responses to the comments received regarding the Draft MND are provided below, and the comment letters received are attached. In some instances, the text of the Final MND has been revised or augmented in response to comments.

The purpose of this document is to respond to specific comments received pertaining to environmental issues in the Draft MND; however, all comments will be forwarded to the Planning Commission for consideration.

COMMENTS AND RESPONSES

Letter No. 1

Chris Schaeffer, Caltrans District 5

April 20, 2012

- 1-1. **Comment:** The technical appendix to the Traffic Study differs from the text of the Traffic Study with respect to the LOS for the SR 154 southbound off-ramp, presumably due to averaging. The degradation of LOS from C to D (A.M. peak Existing + Project) and D to E (A.M. peak Cumulative + Project) at this intersection is significant. Therefore, a queuing analysis for the SR 154 southbound off-ramp shall be prepared. The calculated LOS is probably worse than what is portrayed due to use of the peak hour factor 1.0, which typically skews the results.

Response: Because the project has the potential to impact intersections under the jurisdiction of the City, County and State, the prepared traffic analysis provided methodologies for each appropriate jurisdiction's intersections. The intersection of Foothill Road and the Southbound Highway State Route 154 off-ramp is within the jurisdiction of the County of Santa Barbara. However, Caltrans has stated that the minor leg (ramp) of the intersection is in their jurisdiction and requested that an analysis be performed using specific (non averaged) Caltrans methodology. Therefore both the County's and Caltrans' practices were analyzed.

County: The County does not have an impact threshold for unsignalized intersections. The County's adopted practice is to measure the vehicle delays expressed as a weighted average delay time. Intersection measurements included the off-ramp left-turn and right-turn vehicle delays, and the westbound Foothill Road left-turn vehicle delays. A queuing analysis was prepared by Associated Transportation Engineers (ATE) that showed the peak ramp queue during the morning peak hour would be five vehicles when the project is operational. The off-ramp is in excess of 1,600 feet long with a queuing capacity of approximately 70 vehicles. The project is forecast to add seven peak hour trips to the off-ramp over the peak hour period and would not measurably change the experienced queues.

Caltrans: To accommodate the Caltrans methodology, a revised analysis was prepared by ATE using data acquired in May 2012, standard Highway Capacity Manual (HCM) guidelines, and a more conservative 15 minute time frame increment instead of averaging data over the entire peak hour. This field-measured analysis determined the Existing + Project volumes, which were then entered into the HCM calibrated model. Vehicle delays were shown to be 14.3 seconds in the A.M. peak hour and 11.5 seconds in the P.M.; both of which equate to an acceptable LOS B. The HCM model determined the Cumulative + Project delays to be 16.1 seconds in the A.M. peak hour and 18.8 seconds in the P.M, both of which equate to LOS C, which is considered acceptable by Caltrans for this intersection. Caltrans reviewed the LOS/delay data and had no further comments or concerns (e-mail from Chris Schaeffer, Caltrans, June 4, 2012).

Letter No. 2
Carly Wilburton, APCD
May 1, 2012

- 2-1. **Comment:** Diesel-powered Emergency Standby Generator Engine - APCD will be a Responsible Agency under CEQA; APCD screening HRA identified a significant impact if the engine is operated 50 hours per year for maintenance and testing.

Response: The Initial Study has been updated to identify APCD as a Responsible Agency should the emergency generator be subject to APCD permit requirements and prohibitory rules.

Based on information provided by the applicant, it is estimated that the emergency generator will have an engine rated less than 300kVA. Nevertheless, the Air Quality and Greenhouse Gas Analysis (March 2012) included analysis of a 313 kVA Cummins diesel generator, with a standby kW rating of 250 kW, as a worst-case scenario.

Additionally, the applicant expects to run the generator approximately 15 minutes per week for testing, which equates to approximately 13 hours per year. This is significantly less than the 45 hours identified by APCD as having a less than significant impact. Even if the applicant were to test the generator for twice as long as anticipated, it would still be significantly below the upper limit identified by APCD. Therefore, the generator does not result in significant environmental impacts related to health risks. The initial study identifies that the applicant will need to obtain permits from APCD for this generator. The initial study has been updated to reflect comments from APCD.

A project condition of approval will be recommended to ensure the applicant contacts APCD to confirm the need for a permit for the emergency generator and, if so, to confirm the operational parameters/limitations of that permit with APCD prior to issuance of a building permit.

- 2-2. **Comment:** Exhibit 2 Standard Conditions of Approval, Air Quality-Related condition number 2 "Asbestos & Lead-Containing Materials" includes the following sentence, which is incorrect: "Permits shall be obtained from the Air Pollution Control District prior to commencement of demolition of the structure containing asbestos and/or lead."

Response: The standard conditions of approval have been updated to delete the referenced sentence from the condition.

- 2-3. **Comment:** Suggested inclusion of project-related conditions of approval.

Response: As appropriate, said conditions will be added to the recommended conditions of approval for the project.

Letter No. 3a

**Glenn Russell, Ph.D., County of Santa Barbara Planning and Development
April 27, 2012**

3a-1. **Comment:** The affected parcels are within the provisional planning area for the Draft Goleta Valley Community Plan. Applicable Draft Policies cited.

Response: Comment noted. Said Draft Policies will be forwarded to decision-makers for consideration.

**Letter No. 3b
Eric Peterson, County of Santa Barbara Fire Department
April 26, 2012**

3b-1. **Comment:** The property is located within the Department's Hazardous Material Unit (HMU) jurisdiction, and should be put on General Notice to stop work if visual contamination or chemical odors are detected.

Response: Said condition will be added to the recommended conditions of approval for the project.

**Letter No. 3c
Bret A. Stewart, P.E., County of Santa Barbara Public Works Department
April 25, 2012**

3c-1. **Comment:** Traffic counts appear to be outside the reasonable time window considered acceptable because they are more than 2 years old.

Response: Traffic counts for the various intersections potentially affected by the project were taken in May 2009 by ATE, in April 2008 by Caltrans and in March 2008 by the City of Santa Barbara. Changes to the 2008-submitted project were submitted to staff in September 2011, and the project was deemed complete in December 2011. City Transportation Staff peer reviewed ATE's traffic data to determine if new counts should be conducted. Staff determined that the older count data was acceptable and reflective of the current operations because the volumes in the area had remained the same or decreased due to the effects of the economic downturn on area traffic volumes. Following receipt of this comment, the County provided City staff and ATE counts conducted in 2012 for the County. As seen below, 2012 volume counts conducted by the County confirm city staff's determination for area intersections:

Intersection	2008/2009 Volumes	2012 Volumes	Net Change
SR 154/Calle Real	2,627	2,621	-6
SR 154/State Street	1,755	1,757	+2
State Street/U.S. 101 SB Off-Ramp	2,599	2,526	-73

3c-2. **Comment:** According to recent County and Caltrans analysis, the Highway 154/State Street intersection is operating at LOS D in the P.M. peak under HCM and LOS C under ICU analysis.

Response: The comment was made in error, which was confirmed by William Robertson, Senior Transportation Planner with Santa Barbara County. The ICU analysis performed by the County and Caltrans was for the Grand Hope Ranch Hotel proposed within the County's jurisdiction at the south side of this intersection. The County's analysis for the Grand Hope Ranch Hotel shows the LOS as B not C, which corresponds with that of the current ATE study for this project. Below is the data provided by the County.

Intersection	2008/2009 V/C - LOS	2012 V/C - LOS
SR 154/State Street	V/C 0.65 - LOS B	V/C 0.66 - LOS B

Letter No. 4
Steve Fort, Suzanne Elledge Planning & Permitting Services
April 6, 2012

4-1. **Comment:** Recommended mitigation measure N-4 (Sound Barriers) should be deleted from the Initial Study and MMRP, as it is not applicable.

Response: Mitigation measure N-4 was inadvertently included as a recommended noise mitigation measure. Staff is not recommending that it be applied to the project site, and the applicant did not previously agree to accept it as mitigation. This measure has been stricken from the Initial Study and MMRP.

The closest sensitive receptors (residences) are located approximately 77 feet from the project site, across Cieneguitas Road, in an area where the ambient noise levels are less than 60 dB(A). Residences to the north (across Foothill Road) are located approximately 112-132 feet from the project site, in an area where the ambient noise level is 65-70 dB(A). Grading activities are anticipated to result in the loudest construction noise. This phase of construction is estimated to last approximately 3-½ months. Given the relatively short duration of this phase of construction, recommended mitigation was limited to neighborhood notification (N-1), reduced working hours of 7:00 a.m. to 5:00 p.m. Monday through Friday and no weekend work (N-2), and construction equipment sound control (N-3).

4-2. **Comment:** Inaccurate data is included in the Recreational Demand (p. 32) and Transportation (p. 35) Sections of the Initial Study.

Response: Inaccurate data has been updated.

- 4-3. **Comment:** Concern related to standard condition of approval 2.c.i related to irrigation under oaks.

Response: This comment is referring to Exhibit 2, which lists standard City conditions of approval applicable to the project. This is a standard condition intended to ensure the long-term health of existing and proposed oak trees on site. As part of the preparation of the project's final conditions of approval, staff will work with the applicant to address their concerns regarding a resultant lack of landscaping under the oak(s). Potential clarification of that condition will not result in any environmental impacts and no changes to the Initial Study and MND would be required.

- Attachments:
1. Letter from Caltrans
 2. Letter from APCD
 3. Letters from County of Santa Barbara
 4. Letter from Steve Fort, Suzanne Elledge Planning & Permitting Services



ASSOCIATED TRANSPORTATION ENGINEERS

100 N. Hope Avenue, Suite 4, Santa Barbara, CA 93110 • (805) 687-4418 • FAX (805) 682-8509

Since 1978

Richard L. Pool, P.E.
Scott A. Schell, AICP, PTP

October 16, 2012

08121L07.WP

Craig Minus
The Towbes Group
21 East Victoria Street, Suite 200
Santa Barbara, CA 93101

SANSUM AT FOOTHILL CENTRE PROJECT ANNEXATION TO CITY OF SANTA BARBARA: RESPONSE TO COMMENTS FROM MS. REID

We are in receipt of a copy of Ms. Rosanne Joyce Reid's letter dated September 18, 2012 addressed to Supervisor Janet Wolf. We appreciate that Ms. Reid sets forth her concerns in writing as it gives us an opportunity to review the history of the traffic analysis that took place with respect to the proposed annexation of the Sansum at Foothill Centre Project to the City of Santa Barbara. Below please find our point by point response which cumulatively addresses the concerns raised in Ms. Reid's letter. The comments focus on operations at the State Route (SR) 154/Foothill Road interchange. A copy of the comment letter is attached for reference. It is understood that our responses will be provided to the City of Santa Barbara to assist in their preparation of responses for submittal to LAFCO.

Comment 1: SR 154 Northbound Ramps/Foothill Road Sight Distance

Adequate sight distance is provided at the intersection. The Caltrans Highway Design Manual¹ sight distance standards are used to determine minimum sight distance requirements for intersections based on the speed of vehicles traveling on the intersecting roadway. The posted speed limit on Cathedral Oaks Road west of the SR 154 interchange is 45 mph, and the posted speed limit on Foothill Road (SR 192) east of the interchange is 35 MPH. Based on the criteria contained in the Caltrans manual, 385 feet is the minimum sight distance required for vehicles traveling at 35 MPH, 495 feet is the minimum sight distance required for vehicles traveling at 45 MPH, and 550 feet is the minimum requirement for 50 MPH (see attached table from the Highway Design Manual).

¹ Highway Design Manual, California Department of Transportation, Sixth Edition, 2006.

A field review was conducted to determine the available sight distance for vehicles making a left-turn from the SR 154 Northbound Off-Ramp onto Cathedral Oaks Road. The review found that the sight distance for a driver looking to the east from the SR 154 Northbound Off-Ramp extends beyond the traffic signal at the SR 192/Cieneguitas Road intersection. The field measurement determined that there is over 600 feet of sight distance looking to the east. The review also found that the sight distance looking to the west extended to the horizontal curve in Cathedral Oaks Road. The field measurements determined that there is over 630 feet of sight distance looking to the west. These sight distances exceed the Caltrans minimum sight distance requirements for vehicles traveling at 35 MPH, 45 MPH and 50 MPH. Table 1 summarizes the sight distance data for the intersection.

**Table 1
SR 154 NB Ramps/Foothill Road Sight Distances**

Intersection	Looking East		Looking West	
	Required(a)	Provided	Required(a)	Provided
SR 154 NB Ramps/Foothill Road	495 Feet	600 Feet	495 Feet	630 Feet

(a) Required sight distance based on 45 MPH speed. Sight distance for 50 MPH is 550 feet, which is also satisfied.

Comment 2: Project Traffic

The traffic generated by the project does not create project-specific or cumulative traffic impacts. The MND prepared for the project contained a detailed evaluation of existing and future traffic operations at the SR 154/Foothill Road interchange. The traffic analysis found that the interchange would continue to operate at acceptable levels of service with the addition of project traffic and no mitigations are required. The level of service analysis presented in the MND was reviewed and confirmed with Caltrans staff at a meeting held at the interchange.

Comment 3: SR 154/Foothill Road Interchange Traffic Safety Analysis

The operation of the SR 154/Foothill Road interchange does not present traffic safety hazards. Accident data was obtained from Caltrans for the SR 154 Northbound Ramps/Foothill Road and SR 154 Southbound Ramps/Cathedral Oaks Road intersections to evaluate potential operational safety issues (attached for reference). The accident data correlates to the most current 3-year period available from Caltrans' records (4/1/08 - 3/31/11). The data show that there were 3 accidents recorded at the SR 154 Northbound Ramps/Foothill Road intersection and 0 accidents recorded at the SR 154 Southbound Ramps/Cathedral Oaks Road intersection over the three-year reporting period.

The accident data and the traffic volumes using the intersection are used to calculate an accident rate per million vehicles (MV) using the intersection. The calculated accident rates are then compared to statewide average rates for similar facilities to determine if accident problems exist. The accident rate data for the SR 154 interchange is summarized in Table 2.

Table 2
SR 154 Interchange Accident Summary

Intersection	3-Year Accident History		Statewide Average Rate
	Accidents	Accident Rate	
SR 154 NB Ramps/Foothill Road	3 Accidents	0.20/MV	0.26/MV
SR 154 SB Ramps/Cathedral Oaks Road	0 Accidents	0.00/MV	0.26/MV

The data presented in Table 2 show that the accident rate for the SR 154 Northbound Ramps/Foothill Road intersection is 0.20/MV, while the statewide average rate for similar locations is 0.26/MV. The accident rate for the SR 154 Southbound Ramps/Cathedral Oaks Road intersection is 0.00/MV, and the statewide average rate for similar locations is 0.26/MV. The accident data confirm that there are no significant traffic safety problems at the interchange.

Comment 4: CEQA Traffic Analysis.

The traffic analysis contained in the CEQA documents is adequate. The scope of the traffic study completed for the project MND was developed based on input provided by City of Santa Barbara staff as well as comments submitted by Caltrans, the County of Santa Barbara, and the general public. During the course of the environmental scoping, there were no issues raised by these agencies (or the public) regarding potential safety impacts at the SR 154/Foothill Road Interchange. A field review of the study area was conducted as part of the traffic analysis and no significant safety issues were identified with respect to the interchange configuration and operations. ATE staff also met with Caltrans staff at the interchange during the project approval process to review operations and confirm that there area no significant safety or congestion issues.

Comment 5: County Coordination

The County of Santa Barbara is in the process of updating the Community Plan for the Goleta area. As part of the update, an EIR is being prepared that analyzes existing and future traffic conditions and identifies traffic improvements where required. The EIR analysis includes the SR 154/Foothill Road interchange. Any improvements identified for the SR

154/Foothill Road interchange will be included in the Goleta Transportation Improvement Plan (GTIP) which collects traffic mitigation fees to fund the construction of improvements required to accommodate 20-year traffic volumes.

Comment 6: Developer Improvement Requirements

There is no nexus to require the Sansum at Foothill Centre Project to implement improvements at the SR 154/Foothill Road interchange. The MND completed for the project found that the project would not generate project-specific or cumulative impacts to the interchange based on both the City and County CEQA thresholds of significance. These findings were reviewed and confirmed with Caltrans staff.

Comment 7: Proposed Traffic Circle

Converting the existing SR 154 Northbound Ramps/Foothill Road intersection to a modern roundabout would require a detailed Project Study Report (PSR) to evaluate improvement design alternatives, right-of-way requirements, environmental issues, and costs. Implementation of a roundabout at this location would also likely require additional right-of-way to accommodate larger vehicle turning movements (the east side of the intersection is approximately 70 feet wide and modern roundabouts require widths of 100 to 130 feet). The costs of the project would likely be well over \$1,000,000 dollars. Given the close spacing of the ramp intersections, implementation of a roundabout at the SR 154 Northbound Ramps intersection would also require improvements at the SR 154 Southbound Ramps intersection (with a roundabout at this location possible as well).

An alternative improvement that could be implemented in the future at the SR 154/Foothill Road interchange would be the installation of coordinated traffic signals at the two ramp intersections. The signals are not, however, warranted for existing + project and cumulative traffic conditions.

Comment 8: Caltrans Review

Caltrans utilizes a comprehensive traffic signal warrant system to evaluate the need for traffic signals at stop-sign controlled intersections. The traffic signal warrants are based on a wide range of data including daily and peak hour traffic volumes, vehicle delays, pedestrian volumes, and accident data. As noted above, the installation of traffic signals is not warranted at the interchange at this time.

Comment 9: County Review

As noted above in response to Comment 5, the County is reviewing operations at the interchange in conjunction with the Goleta Community Plan update.

Again, we appreciate Ms. Reid's concern and the manner in which she addresses the issues raised. We hope that the forgoing facts and analysis that were reviewed as part of the approval of the project alleviate her concerns. Should you have any additional questions, please feel free to contact me.

A handwritten signature in black ink, appearing to read 'Scott A. Schell'.

Scott A. Schell, AICP, PTP
Principal Transportation Planner

SAS:DLD:wp

Attachments

cc: Allison DeBusk, City of Santa Barbara
Bob Braitman, LAFCO

Rosanne Joyce Reid
James Elliott Reid
1022 Camino del Retiro
Santa Barbara, CA 93110
(805) 845-3355
Reids1022@cox.net

RECEIVED

SEP 20 2012

1ST DISTRICT OFFICE

September 18, 2012

Supervisor Janet Wolf
County of Santa Barbara
105 E. Anapamu Street
Santa Barbara, CA 93101

Re: Towbes Foothill Centre/ Sansum Clinic Proposal/ Traffic Safety Hazards
Cieneguitas Reorganization: Annexation to City of Santa Barbara(LAFCO 12-4)

Dear Supervisor Wolf -

This letter is to request that you act to delay LAFCO approval for annexation of the Foothill Centre property, into the City of Santa Barbara, until suitable arrangements can be made for adequate traffic control at the State Route 154 northbound exit to Foothill Road/Cathedral Oaks.

Existing Conditions:

We live in Rancho San Antonio, a development of 100 homes above Cathedral Oaks, about ¾ mile west of the subject intersection. Other neighborhoods similarly impacted by the subject project include the Shadow Hills and Via Chaparral neighborhoods, Rancho Santa Barbara, and the other San Antonio Creek neighborhoods, as well as the County Fire Emergency Center and the Alpha Center.

① When we return home from Santa Barbara, we take 154 northbound, exit at Foothill/Cathedral Oaks, and turn left. It is difficult under existing conditions to make this turn, because the intersection has very poor sight distance. The problem is that the intersection is not a 90 degree configuration. To see what is coming from the Foothill/Cieneguitas intersection, one must turn about 130 degrees. For those of us without eyes in the back of our heads, it is very hard to tell what's coming from the east without pulling into the middle of Foothill. I am attaching an aerial photo showing this intersection. Often there are multiple cars stuck in the

middle of Foothill attempting to complete this left turn.

Project Traffic:

Santa Barbara City Planner Allison DeBusk told me the subject project is expected to generate 1,208 Average Daily Trips (ADT). This is equivalent to building 120 new single family homes on the property, except that the project traffic will be compressed into daytime hours.

② The project consists of approximately 60,000 square feet of new buildings intended to house a medical clinic and outpatient surgery center to be operated by Sansum Clinic, together with administrative offices. This property previously had a gas station, and is still undergoing soil remediation.

The project design would direct all of the 1,208 ADT onto Cieneguitas northbound, where the majority of the medical clinic users would turn left onto Foothill, and a majority of those would turn left onto 154 heading towards 101. Obviously this turns a very rural intersection into something quite different. I am seriously concerned about traffic safety.

Traffic Safety Hazards:

③ Those of us turning left from 154 onto Cathedral Oaks have more to worry about than poor sight distance, preventing us from seeing what is coming from Foothill/Cieneguitas. We also have the speeding traffic proceeding east towards Santa Barbara on Cathedral Oaks. The posted speed limit is 45 mph, but the traffic moves much faster than this. The County or CalTrans frequently have mobile speed monitoring devices in place on Cathedral Oaks, which display motorist speeds, but these have little effect in slowing these drivers.

Speed causes accidents, and especially differential speed causes accidents. Under existing conditions we must consider bicyclists who now frequent Cathedral Oaks, of course moving more slowly. If we add project traffic, which will consist of medical and surgical patients, arguably an impaired bunch of drivers, it isn't hard to see the increased risk of accidents.

Our neighborhood conducted an online survey of residents' reactions to the project, and the vast majority of those responding had a significant concern over traffic safety, and held the view that the project traffic would make a real difference, making the area substantially less safe.

CEQA Traffic Significance Thresholds:

Project traffic impacts were assessed by an Associated Transportation Engineers (ATE) Traffic Study. Based on this Traffic Study, the City prepared a Negative Declaration, finding that traffic impacts, as well as all other impacts, were below the Thresholds of Significance, so that no mitigation was required.

The Traffic Study states (pp. 9-10) that City impact thresholds (used to determine whether an impact is significant) were applied to intersections within the City and that Santa Barbara County impact thresholds were applied to intersections within the County.

④ The Foothill/Cieneguitas intersection, which is already signalized, would be in the City of Santa Barbara, upon LAFCO approval of the annexation. The 154/Cathedral Oaks /Foothill intersection, which has only a one-way stop sign at the exit from 154, would remain in the County.

Santa Barbara County's California Environmental Quality Act (CEQA) thresholds require a finding of significance if:

“B. The project's access to a major road or arterial road would require access that would create an unsafe situation...” (or)

C. The project adds traffic to a roadway that has design features (e.g., narrow width, roadside ditches, sharp curves, poor sight distance, inadequate pavement structure) that would become a potential safety problem with the addition of project traffic.” (emphasis added.)

The Environmental Document is Inadequate:

The problem with the Negative Declaration is that the ATE Traffic Study quoted verbatim the above-quoted sections from the County CEQA Thresholds Manual regarding traffic safety, but stopped there. The Traffic Study contains not one word of analysis on the question of whether the design features of this roadway “would become a potential safety problem within the addition of project traffic.”

⑤ Coordination by the City and County is Necessary to Reduce the Traffic Safety Impacts of the Project.

This project cleverly sweeps the Foothill Triangle into the City, which allows development of the property to go ahead without paying a penny of traffic

mitigation fees. If this project were subject to planning and development review by the County, Traffic Mitigation Fees would be required, and these could be used to pay for the costs of adequate traffic control. As is now proposed by the annexation, the County will retain in its jurisdiction the 154/Foothill intersection, with its dangerous condition and potential liability. Those of us living nearby in the County will receive reduced traffic safety and permanently increased risk of traffic injuries.

⑥ You should act to require the developer to provide the necessary traffic controls at 154/Foothill. As members of LAFCO, you are required to consider the effect of the proposed annexation on adjacent areas, and the cost and adequacy of governmental controls in the annexation area and adjacent areas. This is the time for the County to consider the costs of restoring this intersection to a safe condition, including the addition of the project's Sansum Clinic traffic.

A Traffic Circle Should be Considered as one Cost Effective Means of Controlling this Intersection.

⑦ A small traffic circle could probably be constructed within existing right of way, on Foothill at the base of the 154 exit, at modest cost. It could allow all users, including the new medical and surgical patients, existing drivers and cyclists on Cathedral Oaks and Foothill, and those of us trying to turn left at this intersection, to each make our way safely to our destinations.

CalTrans supports the idea of a traffic circle, but says the funds for it would have to come from the County, the City, and SBCAG. (tel conf Chris Schaeffer, CalTrans District 5.)

It is time for you to request the County Traffic Engineer to provide you with an analysis of the cost and feasibility of such a traffic circle. No traffic engineer has done so.

The City was not interested, because the ATE Traffic Study found no significant traffic impact (without a word of analysis regarding traffic safety), and because the City will receive no Traffic Impact Fees from the project.

⑧ CalTrans has no mandate to look forward. They only approve signalization or other traffic control after a certain number of traffic injuries and fatalities have occurred. (A 92-year old woman who died as a pedestrian trying to cross Foothill was the "warrant" who led to the fairly new signal at Foothill and Cieneguitas.)

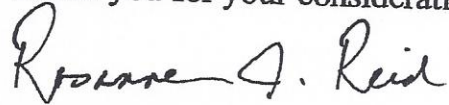
9

However, unlike CalTrans, the County does have the statutory obligation to look forward. LAFCO can only approve the annexation if it has an adequate environmental document. The document must analyze in good faith whether, under County's CEQA Thresholds Manual, "The project adds traffic to a roadway that has design features (e.g., narrow width, roadside ditches, sharp curves, poor sight distance, inadequate pavement structure) that would become a potential safety problem with the addition of project traffic."

Unless you take the time to make suitable arrangements for traffic control at the 154/Foothill/Cathedral Oaks exit, all of us in this area will bear the consequences as long as we live here.

Mr. Towbes is loved by many in Santa Barbara for all he has done to improve the community. His Sansum Clinic project will create a place of healing for many. Certainly he would not want his legacy for those of us in this area of Santa Barbara to be traffic injuries and deaths.

Thank you for your consideration,



Rosanne Reid
encl

**Table 405.1A
Corner Sight Distance
(7-1/2 Second Criteria)**

Design Speed (mph)	Corner Sight Distance (ft)
25	275
30	330
35	385
40	440
45	495
50	550
55	605
60	660
65	715
70	770

**Table 405.1B
Application of Sight Distance
Requirements**

Intersection Types	Sight Distance		
	Stopping	Corner	Decision
Private Roads	X	X ⁽¹⁾	
Public Streets and Roads	X	X	
Signalized Intersections	X	(2)	
State Route Inter- sections & Route Direction Changes, with or without Signals	X	X	X

(1) Using stopping sight distance between an eye height of 3.5 ft and an object height of 4.25 ft. See Index 405.1(2)(a) for setback requirements.

(2) Apply corner sight distance requirements at signalized intersections whenever possible due to unanticipated violations of the signals or malfunctions of the signals. See Index 405.1(2)(b).

405.2 Left-turn Channelization

(1) *General.* The purpose of a left-turn lane is to expedite the movement of through traffic, control the movement of turning traffic, increase the capacity of the intersection, and improve safety characteristics.

The District Traffic Branch normally establishes the need for left-turn lanes. See "Guidelines for Reconstruction of Intersections," August 1985, published by the California Division of Transportation Operations.

(2) *Design Elements.*

(a) **Lane Width --** The lane width for both single and double left-turn lanes on State highways shall be 12 feet. Under certain circumstances (listed below), left-turn lane widths of 11 feet or as narrow as 10 feet may be used on RRR or other projects on existing State highways and on roads or streets under other jurisdictions when supported by an approved design exception pursuant to Index 82.2. When considering lane width reductions adjacent to curbed medians, refer to Index 303.5 for guidance on effective roadway width; which may vary depending on drivers' lateral positioning and shy distance from raised curbs.

- On high speed rural highways or moderate speed suburban highways where width is restricted, the minimum width of single or dual left-turn lanes may be reduced to 11 feet.
- In severely constrained situations on low to moderate speed urban highways where large trucks are not expected, the minimum width of single left-turn lanes may be reduced to 10 feet. When double left-turn lanes are warranted under these same circumstances the width of each lane shall be no less than 11 feet. This added width is needed to assure adequate clearance between turning vehicles.

California Department of Transportation

OTM22130

Table B - Selective Accident Rate Calculation

Policy controlling the use of Traffic Accident Surveillance and Analysis System (TASAS) - Transportation Systems Network (TSN) Reports

1. TASAS - TSN has officially replaced the TASAS - "Legacy" database.
2. Reports from TSN are to be used and interpreted by the California Department of Transportation (Caltrans) officials or authorized representative.
3. Electronic versions of these reports may be emailed between Caltrans' employees only using the State computer system.
4. The contents of these reports shall be considered confidential and may be privileged pursuant to 23 U.S.C. Section 409, and are for the sole use of the intended recipient(s). Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message. Do not print, copy or forward.

OTM22130

Table B - Selective Accident Rate Calculation

Report Parameters-

Event ID: 3486538

Request Name: CPRA SB 192-154 ATE Farrington

Ref Date: 10/11/2012

Request- & Line	L D O I S C R C	Route/Location	Begin Date	End Date	Rate Type	Out Seq	Override Rates			Override ADT		Req. Type	Com- bine?	Excl Ramp?
							Rate	Inj%	Fat%	Main	Cross			
1.1	I T I	05 SB 192 R000.063 - 05 SB 192 R000.064	01-APR-08	31-MAR-11	N	L						N	N	N
1.2	R T I	05 SB 154 R031.237 - 05 SB 154 R031.740	01-APR-08	31-MAR-11	N	L						N	N	N

Event Log:

Job id is : 472509 Accidents Table B Request CPRA SB 192-154 ATE Farrington Submitted by T5SCADEN
05 SB 192 R .063 - 05 SB 192 R .064 04/01/2008 TO 03/31/2011
05 SB 154 R 31.237 - 05 SB 154 R 31.74 04/01/2008 TO 03/31/2011

Location Description	Rate Group (RUS)	36 mo.	No. of Accidents / Significance						ADT Main X-St	Total MV+ or MVM	Actual		Accident Rates		Tot					
			Tot	Fat	Inj	F+I	Multi Veh	Wet			Dark	Pers Klid Inj	Fat	F+I		Fat	Average			
05 SB 192 R000.063 RAMPS TO AND FROM 154 0001-0001 2008-04-01	I 07 S	36 mo.	3	0	1	1	1	3	0	1	0	1	12.5	15.36+	0.000	0.07	.20	0.002	.10	.26
05 SB 154 R031.237 154/EBOFF TO CATH OAKS/192 0001-0002 2008-04-01	R 10 U	36 mo.	0	0	0	0	0	0	0	0	0	0	1.7	1.85+	0.000	.00	.00	0.003	.35	1.01
05 SB 154 R031.355 154/WB ON FR CATH OAKS/192 0001-0002 2008-04-01	R 56 U	36 mo.	0	0	0	0	0	0	0	0	0	0	1.6	1.71+	0.000	.00	.00	0.001	.18	.54
05 SB 154 R031.681 154/EB ON FR CATH OAKS/192 0001-0002 2008-04-01	R 12 U	36 mo.	0	0	0	0	0	0	0	0	0	0	1.8	2.00+	0.000	.00	.00	0.002	.22	.63
05 SB 154 R031.734 154/WBOFF TO CATH OAKS/192 0001-0002 2008-04-01	R 54 U	36 mo.	1	0	1	1	1	1	1	0	0	2	2.0	2.17+	0.000	.46	.46	0.001	.25	.76

Accident Rates expressed as: # of accidents / Million vehicle miles

* denotes that Million Vehicles (MV) used in accident rates instead (for intersections and ramps).

For Ramps RUS only considers R(Rural) U(Urban)