## Laguna Canyon Conservancy P.O. Box 1383 Laguna Beach CA 92652



July 9, 2018

Caltrans Edward Dolan Associate Environmental Planner Caltrans District 12, Division Environmental Analysis 1750 East 4<sup>th</sup> Street Suite 100 Santa Ana CA 92705

Sent Via Email to <u>D12.SR133@dot.ca.gov</u>.

Dear Caltrans,

The Laguna Canyon Conservancy has been tracking Caltrans proposed Laguna Canyon Road (LCR) projects for "improving" traffic and safety. The projects have been combined. The deadline for comments and questions should be extended; by 5 PM July 10, 2018 is unreasonable.

We were told that the number of accidents required the projects, but the accident data is quite dated (2008-2010). A new traffic study needs to be conducted.

The environmental damage to the Laguna Coast Wilderness Park, set aside to be kept natural forever, is considerable. The Mitigated Negative Declaration is insufficient and a CEQA required Environmental Impact Report should be conducted.

Caltrans already has the right-of-way by the Jim Dilley Preserve. The Safety Lane project would extend the two outgoing Laguna Canyon Road lanes at El Toro Road. It currently narrows to one lane for a short distance; the project would make two outgoing lanes to the 73 toll road. So, this project seems fine.

The other projects impact the north side of LCR, taking property from the Laguna Coast Wilderness Park. We think that the result of these projects would make traffic less safe, particularly cars entering and exiting the Willows parking lot crossing two lanes of opposing traffic. A project would extend the two incoming Laguna Canyon Road lanes at EI Toro Road. After EI Toro Road, after a short distance, it currently narrows to one lane; the project would make the two lanes go 900 feet including past the Willows parking lot driveway. Those exiting and turning left now have to cross one opposing lane of traffic; the Caltrans "improvement" would have them cross two opposing lanes of traffic. Also, the

same problem for outbound traffic turning left into the parking lot.

Caltrans agreed to eliminate their proposed high retaining wall along the road and the wilderness park, however, replacing it with contoured grading that would go 40 feet into the wilderness park. The "benefits" do not warrant this intrusion. Concerns include fourteen oak trees to be removed, and treasured rock formations to be graded away.

Caltrans proposes improving Laguna Canyon Creek drainage with the addition of articulated block channel. Caltrans maintenance does need to clear out the creek effectively, perhaps more frequently, which should be conducted in an environmentally sensitive appropriate solution for riparian habitat.

Other design alternatives should be explored. For example, the county El Toro Road from the 73 toll road to Laguna Canyon Road could be restored to open space, or used as a one-way north segment. Vehicles traveling south on El Toro Road can now take the northbound 73 feeder which connects at Laguna Canyon Road where one can make either a left-hand or a right-hand turn on Laguna Canyon Road at an existing traffic signal.

So, the Laguna Canyon Conservancy opposes all the north side, incoming lane Caltrans projects.

Thanks for your support. If you would like to discuss this matter with me, please contact me at <u>Gene@Felders.Net</u> or 949-939-7257.

Gene Felder President Laguna Canyon