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Table 1.0-2 Index to Comments from Individuals on the Draft EIR
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1.1 Comments from Agencies on the Draft EIR

The following table lists, in no particular order, the comments received from agencies on the Draft EIR.

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1.2 Comments from Individuals on the Draft EIR

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## Comments from Organizations on the Draft EIR

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<td>Dianne Conn, Isla Vista Recreation and Park District</td>
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2.0 Master Responses .................................................................................. 2.0-1

2.1 Master Response - Water Supply ...................................................... 2.0-1
2.2 Master Response - Traffic Fair Share Mitigation ............................ 2.0-20
2.3 Master Response - Fiscal Impacts .................................................. 2.0-23
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CHAPTER 2.0
Master Responses

This chapter presents master responses to repeated issues that were raised by commenters. Throughout Chapters 3.0 and 4.0, responses make reference to one or more of the Master Responses below.

2.1 Master Response - Water Supply

I. Preparation of the RDEIR’s Water Supply Analysis

In March 2008, the University issued the Draft EIR for public review and comment. Draft EIR Section 4.14 analyzes water supply impacts. Prior to preparing the Draft EIR, the University sent a Notice of Preparation (NOP) to over 70 individuals, organizations, and public agencies, including the Goleta Water District. The NOP was distributed from May 23, 2007 to June 21, 2007. In addition, the University held a scoping meeting and provided notice to the same individuals, organizations, and agencies that received the NOP.

The University received comments on the Draft EIR relating to water supply that covered a range of issues. The comments on the Draft EIR included a June 16, 2008 letter from the Goleta Water District (“GWD” or “District”) asking the University to revise the water supply and demanding the University base its analysis on new information contained in the Water Supply Assessment for the City of Goleta General Plan (“2008 WSA”). The 2008 WSA was prepared by GWD in accordance with Water Code section 10910 and approved by the District on May 22, 2008. In its June 16, 2008 letter, the District stated that the University “… should use [the 2008 WSA] to prepare [its] final EIR.” According to the District’s letter, the 2008 WSA updates the information contained in the District’s 2005 Urban Water Management Plan (“2005 UWMP”) relating to, among other things, the interpretation of the Safe Water Supply Ordinance (“SAFE”) regarding the drought buffer and groundwater pumping.

In response to GWD’s request, and in response to other comments received on the Draft EIR, the University revised and recirculated portions of the Draft EIR in a Recirculated Draft EIR volume (“RDEIR”) for additional public review and comment. In particular, the University took the District’s advice, and revised and recirculated Section 4.14, Water Supply, using the projections and analysis in the 2008 WSA. See, e.g., RDEIR, p. 4.14-2. Revised Section 4.14 also contains a discussion of additional mitigation measures that were not identified in the Draft EIR.

During the public review period for the RDEIR, the University received comments on the revised water supply analysis. In a letter dated March 30, 2009, GWD provided comments on RDEIR section 4.14. GWD’s March 2009 letter asks the University to ignore the advice in the District’s July 2008 letter and, once again, requests the University to change many of the facts and assumptions upon which the analysis in the EIR is based. The changes now recommended by the District (made soon after recent changes in GWD’s elected Board of Directors and management), and supported by other commenters, would require substantial departures from the projections and analyses in the 2008 WSA without any apparent basis in
substantial evidence. In short, the District asks the University to ignore the 2008 WSA, which provided the basis for the analysis in RDEIR Section 4.14, and requests instead that the University base its analysis on the District’s future, unwritten plans. See Letter R-13, General Comment. Because GWD’s most recent comments appear to contradict the assumptions in the 2008 WSA, and because no new substantial evidence is provided, the University chooses to rely on the approved 2008 WSA, which is currently the best available analysis of water supply for the District, for the analysis in RDEIR Section 4.14.

II. The Conclusions of RDEIR Section 4.14

The RDEIR concludes that the future water supply will be sufficient to meet demand associated with the buildout of the LRDP and other projected growth within GWD’s service area, unless recycled water supply projections are not met. See RDEIR, pp. 4.14-36 to -38, 4.14-44. RDEIR Tables 4.14-12 and 4.14-13 show the water supply and demand for a single critical dry year and multiple dry years, respectively. RDEIR, pp. 4.14-37 to -38. According to these analysis, District water supplies, combined with new recycled water capacity, will be sufficient to meet demand in both a critical dry and multiple dry years.

If the projected recycled water supply is not available to offset future water demand, the RDEIR estimates a 17 acre feet (“AF”) shortage of water in 2030. RDEIR, p. 4.14-44. The potential shortfall is the amount of water needed to serve approximately 100 students; therefore, it is feasible for the University to modify its enrollment capacity to meet this potential shortfall if necessary. RDEIR, p. 4.14-48.

Moreover, the RDEIR identifies a full array of mitigation measures that will reduce this potentially significant impact to a less-than-significant level. RDEIR, pp. 4.14-34 to -35. Mitigation Measures W-3A, -3B, -3C, -3D, and -3E will reduce potable water demand from the University. See Part VI.C of this Master Response for a discussion of the feasibility of these mitigation measures. These measures include installing water saving devices, conducting water conservation outreach, and implementing a campus water conservation program. RDEIR, p. 4.14-34. Mitigation Measure W-3F requires the University to identify and acquire additional water supplies as needed to serve UCSB potable water demand. RDEIR, p. 4.14-34. Mitigation Measure W-3F is discussed further in Part VI.B, below. Mitigation Measure W-3G requires the University to conduct a project-specific water availability analysis for each proposed new building, and to ensure that adequate water supplies are available for the development. RDEIR, p. 4.14-35. This measure also requires the University to halt development if certain conditions, which would indicate a potential water supply shortfall, are met. Id.

III. The SAFE Ordinance

The District’s March 2009 comment letter recommends changing the RDEIR’s interpretation and application of the SAFE Ordinance, especially as it relates to deliveries from the State Water Project, the allocation of water to new connections, and the use of “banked” groundwater.

The interpretation of the SAFE Ordinance in the RDEIR is taken directly from the 2008 WSA. All of the tables, calculations, and conclusions in the 2008 WSA take SAFE’s
limitations and requirements into account. At the time the RDEIR was prepared, the 2008 WSA was the most up-to-date interpretation of SAFE adopted by GWD, the agency charged with implementing the ordinance. Since that time, the GWD has adopted its Groundwater Management Plan, which reinforces the WSA’s interpretation of SAFE.

While commenters, including GWD, have suggested alternative interpretations of SAFE, and have questioned the 2008 WSA’s projections of the SAFE’s future effects on the availability of water supplies, none have presented facts or argument to suggest that the 2008 WSA, and therefore the RDEIR, are based on anything other than substantial evidence. Therefore, as discussed above, the University chooses to rely on the interpretations and applications of the SAFE Ordinance contained in the approved 2008 WSA.

A. Future Projections of Groundwater/Conjunctive Use Variability and of New Connection Allocations.

Several comments question the RDEIR’s projection that certain, specific conditions will continue into the future. In each case, the pertinent assumptions were taken directly from the 2008 WSA.

For example, Table 4.3 of the 2008 WSA projects that the potable water supply for purposes of calculating the amount available for new connections will be 15,472 acre feet per year (“AFY”) through 2030, and that 154 AFY will be available for new connections every year during that period. In addition, by projecting that new connections will be available each year, the 2008 WSA demonstrates that the District expects that the conditions of Paragraph 4 of SAFE will be met in each of these years. The RDEIR reasonably relied on the 2008 WSA’s projection that Paragraph 4 will continue to be met during the timeframe of LRDP development.

Similarly, 2008 WSA Table 3.2 indicates that 400 AFY of groundwater/conjunctive use will be available through 2030. As the 2008 WSA states on page 11, this 400 AFY is available only when the Central Basin is “at or above 1972 levels.” Thus, by projecting that 400 AFY of groundwater/conjunctive use will be available, the 2008 WSA recognizes that the basin will remain at or above 1972 levels for the timeframe of LRDP development. Moreover, the 2008 WSA supports its projection that 400 AFY of groundwater/conjunctive use will be available by including a review of historical groundwater injections. According to the 2008 WSA, the GWD has injected 6,804 AF of Lake Cachuma spill water into the groundwater basin over the past 16 years, or about 426 AFY. 2008 WSA, p.11. According to the 2008 WSA, as of December 2007 there was an estimated 6,000 - 12,000 AF of water in the basin in excess of 1972 levels. Id. The 2008 WSA estimates the amount of water available for conjunctive use based on the average amount of water injected into the basin each year over the last 16 years,

1 Paragraph 4 of the SAFE Ordinance states “The District shall be forbidden from providing new or additional potable water service connections to any property not previously served by the District until all of the following conditions are met:

a. District is receiving 100% of its deliveries normally allowed from the Cachuma Project;
b. The District has met its legal obligations required by the judgment in Wright v. Goleta Water District;
c. Water rationing by the District is eliminated;
d. The District has met its obligation to make its Annual Storage Commitment to the Drought buffer.”
425 AFY. Id. The 2008 WSA rounds 425 AFY down and projects that 400 AFY may be used "conjunctively" with other sources as long as the basin remains at or above 1972 levels. 2008 WSA, p. 12. Therefore, the RDEIR reasonably relied on the availability of groundwater/conjunctive use in its water supply analysis.

B. State Water Project Deliveries.

The District now recommends using a range from 0 to 3,800 AFY to characterize future deliveries from the State Water Project to GWD in normal rainfall years, rather than using the full 4,500 AFY of SWP water that is available to the District in normal years. See Comment R-13-6. The RDEIR bases its projection of 4,500 AFY on the 2008 WSA, which projects that the full 4,500 AFY will be available in normal rainfall years for water supply planning purposes. Specifically, the 2008 WSA states at page 6:

“The long-term average SWP delivery is projected by the Department of Water Resources (DWR) to be about 63 percent of “Table A amounts” (as reported in the State’s draft 2007 SWP Delivery Reliability Report). Hence, the District's 7,450 AFY allotment is projected to allow average delivery of 4,694 AFY, and so significantly improves the reliability of the SWP being able to deliver the District’s basic supply of 4,500 AFY.”

The 3,800 AFY amount, by contrast, is used only to determine the amount of water supplies that may be allocated each year to new service connections pursuant to the SAFE Ordinance. See 2008 WSA, pp. 16-17.

C. Allocation of Water for New Connections.

While the District’s comment letter recommends several revisions to the assumptions used in RDEIR Table 4.14-4 (Projected SAFE Potable Water Calculation) (see Comment R-13-33), the amount of GWD’s latest estimate of the SAFE 1% allocation (155 AFY) is almost the same as the amount used in RDEIR Table 4.14-4 (154 AFY), except that the District recommends expressing the allocation as a range of 114 – 155 AFY. The District calculates this range based on the assumption that SWP deliveries could fluctuate between 0 and 3,800 AFY. See Comment R-13-33. The 2008 WSA, however, projects that 154 AFY will be available for new connections annually. 2008 WSA, p. 17. The RDEIR reasonably relied on this projection.

The University acknowledges that the future availability of GWD water is subject to the SAFE Ordinance and that the amount of water available for new connections in a particular year may be reduced if the District’s total potable water supply is reduced. Such a reduction in the amount of water available for new connections is not an adverse effect on the environment, as it would potentially slow, not speed, growth under the 2008 LRDP.

Several comments suggest that the analysis of water supply should have considered the question of whether SAFE’s 1% allocation limitation will prevent GWD from providing the University with water for growth under the LRDP. The RDEIR addresses this issue on page 4.14-36, and concludes that LRDP growth is unlikely to require more than a small part of the allowed allocation in any given year. As explained in the RDEIR, the average amount available for new connections annually would be 154 AFY, while development under the
LRDP would, on average, annually require 53.5 AFY for new connections. In an average year, GWD would have 100.5 AFY available for new connections in addition to the Campus’ new needs. According to GWD’s Groundwater Management Plan, 1997 is the only year out of the last 13 in which new service demand exceeded 100 AFY. See Final Groundwater Management Plan, Table 4-4. Average new service demand between 1997 and 2009 was 43 AFY. The 1% limitation will not prevent GWD from providing sufficient water to both the University and the other reasonably foreseeable potential new water users.

D. Banked Groundwater.

Under the Wright Judgment, the District is entitled to 2,350 AFY of groundwater. When water levels in the groundwater basin are below 1972 levels, however, SAFE does not allow the District to actually pump the water and provide it to customers. Instead, that water is contributed to the District’s “annual storage commitment,” and becomes part of the drought buffer. The District receives credit for each year’s contribution, so that the stored water is available when SAFE’s conditions are met—that is, during a SAFE-defined drought. When the basin is above 1972 levels, then the District may pump its Wright Judgment entitlement, plus any additional amount that it has stored in excess of 1972 levels.

Accordingly, RDEIR Figure 4.14-2 has been deleted and Page 4.14-4 of the RDEIR has been amended as follows:

The District’s ability to draw this water out of the groundwater basin is limited by the SAFE Ordinance. As explained in more detail below, if the basin’s water storage falls below its 1972 levels, then the District must leave its Wright Judgment entitlement in the basin. As long as the basin holds water at a level above the level it held in 1972, then in normal years the District must maintain a 2,000 AF buffer above 1972 levels but otherwise may use the water in the annual amounts described above. In the WSA, the District estimates that there are 6,000-12,000 AF above the 1972 level available in the basin for normal years; the 2,350 AFY of Wright Judgment water is therefore available to meet District demand. In dry years when deliveries from the Cachuma Project are reduced, the District may draw on the drought buffer. If the basin falls below the 1972 level, then in normal years, the District may use only use its Wright Judgment entitlement; banked water is available only in dry years.

This change does not alter the RDEIR’s analysis because, as discussed in section III.A, above, the groundwater basin is above 1972 levels and is likely to stay above that level during the timeframe of the LRDP. Thus, Wright Judgment water and stored water above 1972 levels will be available as the RDEIR assumes.

The District’s comment letter also points out that the District may pump water from its drought buffer only during a SAFE-defined drought. See Comment R-13-14. The RDEIR applies the same projections for use of the drought buffer as those shown in Table 5.2 on page 19 of the 2008 WSA. Similarly, the RDEIR’s drought buffer supply projections are subject to the same limitations described in the 2008 WSA. For instance, WSA Table 5.2 indicates that the District intends to use water stored in the groundwater basin as permitted by the SAFE Ordinance during a critical dry year to augment other supplies. By similarly
projecting groundwater pumping, the RDEIR incorporates the 2008 WSA’s interpretation of the SAFE restrictions on groundwater pumping.

Specifically, Table 3.4, footnote (c), of the 2008 WSA indicates that critical dry year pumping of the SAFE groundwater drought buffer is acceptable because “SAFE provides for use of the Drought Buffer when supplies from Cachuma are reduced.” See GWD Ordinance 91-01 (“SAFE”) § 1.2. Both the 2008 WSA and the RDEIR include Lake Cachuma supply reductions in the projections for critical dry years. By using banked groundwater during critical dry years, the 2008 WSA acknowledges that these critical dry years meet the SAFE-required conditions necessary to draw on banked groundwater.

According to the 2008 WSA, since 1992, GWD has contributed 43,417 AF of water to the groundwater basin. 2008 WSA, p. 10. Groundwater levels now exceed 1972 levels by between 6,000 and 12,000 AF. 2008 WSA, p. 11. As stated on page 4.14-8 of the RDEIR (which relies upon Table 5.2 of the 2008 WSA), under the SAFE Ordinance the District may pump up to 3,950 AFY of previously stored groundwater to augment other supplies during critical dry years.

The District also challenges the certainty of the amount of water in the Central Basin above 1972 levels. See Comment R-13-35. The 2008 WSA passage quoted above supports the RDEIR’s use of the range of 6,000 to 12,000 AF for that amount.

IV. Potential Constraints on Water Supply Sources

A. The Cachuma Project

As noted above, the RDEIR uses the same projections of water supplies as the 2008 WSA. These projections include the estimated amounts of future supplies to GWD from the Cachuma Project.

In its March 2009 comment letter, the District raises concerns about the effect of siltation on the Cachuma Project’s ability to deliver the project amounts of water. Based on this siltation study and uncertainty about Lake Cachuma recharge, the District recommends reducing the District’s assumed future deliveries from Cachuma from 9,322 to 9,000 AFY. See Comment R-13-29.

The 2008 WSA addressed the question of siltation’s impact on future Cachuma deliveries and concluded as follows on page 6:

“More information on Cachuma siltation will be available by 2010 when the District prepares an UWMP that projects supply and demand through 2035. It is possible that when the Cachuma contract is renewed in 2015 there will be adjustments to the District allocation. Factors to be considered are expected to include the effects of siltation (resulting in a reduction in allocations) and modified operations of the reservoir (that could result in an increase in allocations). Consequently this analysis assumes a constant allocation.”

The RDEIR bases its analysis of siltation on this language of the 2008 WSA. RDEIR, p. 4.14-13.
The siltation data presented in the RDEIR indicates that the siltation rate was approximately 375 AFY for 1956 to 1996. RDEIR, p. 4.14-13. In its comment, the District provides new information about the siltation rate based on the Cachuma Lake Bathymetric survey completed in June 2008. According to the numbers provided in the District’s letter, this study indicates that siltation of Cachuma has slowed in recent years, proceeding at a rate of approximately 175 AFY for 2000 to 2008 as opposed to 386 AFY for 1956 to 2000. This siltation information does not change the conclusions presented in RDEIR.

The University continues to rely on the conclusion of the 2008 WSA that it is appropriate to assume a constant allocation to the District. Although the District comment also suggests that siltation may increase in future years, the District provides no quantification of these potential increases. The District similarly does not provide any information indicating how this siltation will affect future allocations nor does it explain the derivation of its suggested deduction from the Cachuma allocation. As the RDEIR recognizes, the District’s allocation depends on a number of factors. Modified reservoir operations could offset some or all of the potential impacts of siltation. RDEIR at 4.14-13. The University therefore concludes that the WSA’s approach of assuming a constant allocation for the District remains appropriate.

Several commenters also point out that a water rights proceeding regarding the operation of Lake Cachuma is presently pending before the State Water Resources Control Board. To predict the outcome of this proceeding and its effect on future water deliveries to GWD would be speculative. Rather than engage in such speculation, the RDEIR continues to rely on the projections contained in the 2008 WSA.

The District also raises a concern regarding the RDEIR’s treatment of the Lake Cachuma Surface Water Buffer. Table 4.14-13 of the RDEIR includes estimates of water supply and demand for multiple dry years. See RDEIR, p. 4.14-38. Table 4.14-3 shows that the Lake Cachuma Surface Water Buffer will provide 3,584 AF of water supply each year. As the District points out, however, assigning the Lake Cachuma Buffer a constant volume overestimates the total water supply.

Table 4.14-13 will therefore be updated as shown below, with the appropriate treatment of the Lake Cachuma Buffer, so that each year’s available Buffer equals the previous year’s surplus. As the table shows, District supplies are sufficient to meet the projected future demand, including the 2008 LRDP, in every year of a multiple dry year scenario.
### Table 4.14-13 Estimate of Supply and Demand to the Goleta Water District for Multiple Dry Years of 2025 through 2030 Including the 2008 LRDP

<table>
<thead>
<tr>
<th>Year</th>
<th>Supply</th>
<th>Demand</th>
<th>Surplus/Shortage</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Cachuma project</td>
<td>9,322</td>
<td>5,761</td>
</tr>
<tr>
<td></td>
<td>State Water</td>
<td>2,533</td>
<td>2,710</td>
</tr>
<tr>
<td></td>
<td>Annual Groundwater Right&lt;sup&gt;1&lt;/sup&gt;</td>
<td>2,350</td>
<td>2,907</td>
</tr>
<tr>
<td></td>
<td>Groundwater/Conjunctive Use</td>
<td>0</td>
<td>319</td>
</tr>
<tr>
<td></td>
<td>Groundwater Above 1972 Water Levels</td>
<td>1,283</td>
<td>2,708</td>
</tr>
<tr>
<td></td>
<td>SAFE Groundwater Drought Buffer&lt;sup&gt;1&lt;/sup&gt;</td>
<td>0</td>
<td>319</td>
</tr>
<tr>
<td></td>
<td>Lake Cachuma Surface Water Buffer</td>
<td>3,584&lt;sup&gt;2&lt;/sup&gt;</td>
<td>2,708</td>
</tr>
<tr>
<td></td>
<td>Total Supply&lt;sup&gt;3&lt;/sup&gt;</td>
<td>19,072</td>
<td>15,261</td>
</tr>
<tr>
<td></td>
<td>Single Family Residential</td>
<td>5,761</td>
<td>5,815</td>
</tr>
<tr>
<td></td>
<td>Multiple Family Residential</td>
<td>2,710</td>
<td>2,725</td>
</tr>
<tr>
<td></td>
<td>Commercial</td>
<td>2,907</td>
<td>2,913</td>
</tr>
<tr>
<td></td>
<td>Landscape</td>
<td>319</td>
<td>320</td>
</tr>
<tr>
<td></td>
<td>Agriculture</td>
<td>2,708</td>
<td>2,719</td>
</tr>
<tr>
<td></td>
<td>2008 LRDP</td>
<td>856</td>
<td>980</td>
</tr>
<tr>
<td></td>
<td>Total Customer Demand Inclusive of 2008 LRDP</td>
<td>15,261</td>
<td>15,347</td>
</tr>
<tr>
<td></td>
<td>Dry Year Demand Surcharge (7%)&lt;sup&gt;4&lt;/sup&gt;</td>
<td>1,068</td>
<td>1,074</td>
</tr>
<tr>
<td></td>
<td>Unaccounted Losses (6%)</td>
<td>980</td>
<td>985</td>
</tr>
<tr>
<td></td>
<td>Recycled/Potable Water Offset</td>
<td>-750</td>
<td>-800</td>
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<tr>
<td></td>
<td>Total Demand Including 2008 LRDP</td>
<td>16,559</td>
<td>16,425</td>
</tr>
<tr>
<td></td>
<td>Surplus/Shortage&lt;sup&gt;5&lt;/sup&gt;</td>
<td>2,513</td>
<td>2,513</td>
</tr>
</tbody>
</table>

**Notes:**
1. Total well capacity is 6,700 AFY.
2. Drought buffer pumped as allowed by SAFE.
3. Total available supplies increase for the first three years because of groundwater pumping.
4. Assumes demand in years 2025 through 2027 is 107% of normal year demand. Increased demand is assumed not to occur in years 2028, 2029 and 2030 because the District would be in years four to six of an extended drought and will be implementing a demand reduction program.
5. Represents the average amount of unused Cachuma Project water carried over from prior years since 1994.


To meet projected demand, revised Table 4.14-13 draws on the SAFE drought buffer in years 2028-2030. SAFE permits use of the groundwater buffer during these years, because in each of these years Lake Cachuma deliveries are projected to be reduced because of drought.

The buffer contains sufficient water to meet these projections: the total projected groundwater pumping over these three years (10,470 AF) from the drought buffer is a small portion of the total banked groundwater supply (40,000 AF). See 2008 WSA at 14. This conclusion is further supported by the analysis of hydrogeologist Timothy Thompson, who reviewed the RDEIR’s analysis, the analysis presented in this Master Response, and the relevant GWD.
documents, and met with District staff. As Thompson explains in a letter presenting his review (the “Thompson Letter”), “it is appropriate to identify pumpage of this banked Drought Buffer groundwater as a water supply source during drought periods such as those evaluated in the LRDP EIR.” Thompson further concludes that . . . “[A]mounts up to 17,500 AF are reasonable planning quantities that can be identified as available from the Drought Buffer water supply for a given drought period.” These analyses demonstrate that the drought buffer has enough water overall to provide what would be needed for this hypothetical three-year period. Although these projections show the District with no surplus water in the last three years of the drought, the groundwater buffer would continue to contain further water.

As to the amount available in any given year, the largest amount drawn from the Drought buffer for any year is the 3,759 AF in the last year of the six-year period. This is less than 3,950 AF, the amount the District proposes to draw from the drought buffer in critical dry years. See 2008 WSA, Table 5.2.

These revisions to Table 4.14-13 demonstrate that the revised treatment of the Lake Cachuma Buffer does not alter the RDEIR’s conclusions regarding water supply.

Commenters also suggest that spills from Lake Cachuma might use up the entire buffer and that spill water is lost water. Spills will only occur at Lake Cachuma during wet years; i.e., when there is too much water for the reservoir to hold. Hence, spills involve surplus water. The RDEIR bases its projections for the Lake Cachuma buffer on the 2008 WSA, which projects that the buffer will be available during normal, multiple dry, and critical dry years. See 2008 WSA, p. 14. In wet years, Cachuma spill water may be either used directly by the GWD to serve customers or injected into the groundwater basin.

B. The Reliability of State Water Project Deliveries

As stated above, GWD’s March 30, 2009 comment letter recommends using a range of 0 to 3,800 AFY, rather than the full 4,500 AFY, as the amount of future deliveries from the State Water Project to GWD in normal rainfall years. See Comments R-13-6 and R-13-16. To support this recommendation, the comment letter notes that this year’s allocation is 20% of Table A amounts, and quotes a March 21, 2009 article in the Los Angeles Times which refers to a “Department of Water Resources report” which states that there is a 40% probability of a magnitude 6.7 earthquake in the next 25 years that would cause 27 or more Sacramento-San Joaquin River Delta islands to flood, which would, in turn, lead to salt water intrusion into the fresh water delivery system.

The RDEIR projects that the State Water Project (SWP) will provide a long-term average of 4,500 AFY to the District in normal years. The District’s total allotment of SWP water (its “Table A amount”) is 7,450 AFY. 4,500 AFY is equal to the District’s share of the capacities of conveyance facilities that bring SWP water to Lake Cachuma—the maximum amount that the District could receive from the SWP without physical infrastructure improvements. According to the 2008 WSA, the state Department of Water Resources (DWR) projects that the long-term average SWP delivery will be 63% of Table A amounts. 2008 WSA, p. 6. Sixty-three percent of 7,450 AF is 4,694 AF, which is more than the District’s share of the SWP

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conveyance facilities. In other words, on average the SWP will be capable of delivering more water than the District has the capacity to accept in normal years. Thus, the 2008 WSA and the RDEIR reasonably use the District's entire share of the conveyance facilities' capacity, 4,500 AFY, as the expected long-term average delivery of SWP water to the District in normal years.

For the projection that the SWP will deliver a long-term average of 63% of Table A amounts, the 2008 WSA relied on DWR's draft 2007 State Water Project Delivery Reliability Report (“Reliability Report”), a final version of which (“Final Reliability Report”) was released in August 2008. ³ 2008 WSA, p. 6. The Reliability Report calculated the long-term average delivery of the SWP using a series of computer simulations. This modeling process took into account potential hydrologic changes caused by climate change. See Reliability Report, p. 18. The modeling also included the effects of changes in SWP operations due to litigation concerning the endangered delta smelt. Id.

The computer model used in the Reliability Report did not include the risk of earthquakes causing levee failure and disrupting SWP conveyance through the Delta. The impacts of such events, the Final Reliability Report states, are too speculative to be incorporated effectively into a predictive model: “The impact on SWP deliveries due to a single or multiple levee failure is highly dependent on where the levees fail and the Delta conditions at the time . . . the effect on SWP deliveries can range from relatively minor to catastrophic for a large earthquake with extensive levee failures, depending on whether the earthquake occurs under dry or wet Delta conditions.” Final Reliability Report, p. 21.

The Final Reliability Report did, however, discuss potential earthquake impacts:

“Key findings of the Draft Phase 1 Delta Risk Management Strategy report on possible impacts on SWP deliveries due to earthquakes are:

- When the probability of all seismic levee breaches under existing conditions is considered, about 115 levee failures can be expected during 100 years.
- There is about a 28 percent chance of 30 or more islands simultaneously failing during a major earthquake in the next 25 years.
- A moderate to large earthquake capable of causing multiple levee failures could happen in the next 25 years. Under such an earthquake, extensive levee failure would most likely occur in the west and central Delta. Levee repairs could take up to 6.5 years and exports from the Delta could be disrupted for up to two years with a loss of up to 9.3 [million acre feet] of water.
- By 2050, the frequency of island flooding from seismic events is expected to increase by 12 percent over 2005 conditions, if a seismic event has not occurred.”

Final Reliability Report, p. 34.

Thus, while seismic disruption to the delivery of SWP water is a real possibility and must be considered during water planning, DWR, the state agency charged with operating and planning for the SWP, has determined that the potential for such disruption cannot be

³ Available at: http://baydeltaoffice.water.ca.gov/swpreliability/Final_DDR2007_summary_82808.pdf

Moreover, the risk to the SWP deliveries from seismic damage in the Delta affects the population of California generally, approximately two-thirds of which relies on SWP water, and is unaffected by the proposed 2008 LRDP. See, e.g., Dan Walters, “A new shot at settling Delta water war,” Sacramento Bee, August 16, 2009. If an earthquake were to disrupt the SWP, water districts and their customers throughout the state would rely on emergency measures, likely including strict rationing. The University would be subject to such measures along with every other GWD customer. The effect of such measures is not an impact on the environment attributable to the LRDP.

C. System Loss

The District’s comment letter recommends accounting for a system loss of 7% in the calculation of available supplies. Both the 2008 WSA and the RDEIR treat system loss as part of demand, and assume that system loss will be 6%.

As noted in the RDEIR, a 2005 Water Distribution Audit for the Goleta Water District concluded that unaccounted-for water loss consumes 6% to 8% of the District’s total production. RDEIR, p. 4.14-21. The 2008 WSA, which post-dates the Water Distribution Audit, uses 6% as the percentage attributable to system loss for 2010 and beyond. 2008 WSA, p. 16. Therefore, the RDEIR reasonably estimates that 6% of the District’s total water production goes to unaccounted system losses.

V. Demand Issues

A. Recycled Water

The RDEIR projects that annual recycled water use will increase by 50 AF each year, which will offset 1000 AFY of potable water demand by 2030. See RDEIR, pp. 4.14-18 to 19. The Goleta Sanitary District currently produces 1,000 AFY of recycled water; that capacity is expected to increase by 2,300 AFY, to 3,300 AFY, by 2014. RDEIR, p. 4.14-5. The RDEIR, however, conservatively assumes that only 1,000 AFY of that increase will be used to offset potable demand by 2030, based on limitations in the recycled water distribution system, and on uncertainty regarding the market for the District’s recycled water. Id. The RDEIR averages the total projected growth over the time between the present and 2030, for an annual usage increase of 50 AFY. Id.

The Goleta Sanitary District’s waste water treatment plant, which provides recycled water to GWD, has sufficient capacity to achieve this increase, as confirmed by personal correspondence with Goleta Sanitary District staff.4

The District and other commenters, however, suggest that this projected increase in recycled water use is unrealistic or unreasonable. In particular, the District states that demand for and

4 Sources: Jeff Salt, Goleta Sanitary District [email correspondence, September, 2007]; Rob Hidalgo, Operations Supervisor, Goleta Sanitary District [phone call, December 1, 2008].
provision of recycled water will remain at current levels (1,000 AFY) throughout the time frame of the LRDP (See, e.g., Comment R-13-15).

This position is a significant departure from previous District policy and statements on this issue. The RDEIR uses the recycled water use projections in the 2008 WSA. The 2008 WSA states that recycled water will provide an offset to potable water use. Specifically, page 8 of the 2008 WSA states:

“There is increasing statewide pressure to increase water recycling. Recycled water is used in many parts of the State and nation for ornamental plants, tree crops, and some row crops. This would likely require an increased level of treatment to reduce total dissolved solids, an expanded distribution system, and possibly new storage facilities. Upgrades to the distribution system and new storage facilities are now part of the Goleta Water District’s long-range capital improvement schedule.”

Similarly, the District’s comment letter on the DEIR proposed that the University consider an expansion in recycled water use, specifically mentioning the Patterson Avenue area flower growers” as a potential market. See Comment A-9-5. The District’s encouragement of recycled water use is in accord with state law. Water Code section 13551 generally prohibits the use of potable water for industrial uses (as well as golf courses, cemeteries and landscape irrigation) when recycled water is available.

In addition to these general policy statements, the WSA specifically includes increased recycled water use in projections of future supply and demand. On Page 8, the WSA states that planned system upgrades will allow “at least a modest and conservative increase of 50 AFY on average of recycled water over the next 22 years. With upgraded treatment, this 50 AFY can also offset existing and future agricultural water demand.” Moreover, Tables 4.2 and 5.2 in the 2008 WSA indicate that the amounts of recycled water that will be used to offset current potable water use will increase by 1000 AFY between 2010 and 2030.

The District comment letter contradicts the WSA’s policy and projects, stating that GWD does not have “the market, distribution, or storage capacity for recycled water.” E.g., Comment R-13-15. The 2008 WSA, however, states on page 7:

The District anticipates that recycled water use will increase, particularly by the University of California, in future years. The District also has an agreement with one large landowner to provide about 222 acre-feet of water for a future golf course or agricultural use. Notwithstanding operational contingencies, recycled water has good delivery reliability because the amount of wastewater flowing into the Goleta Sanitary District even in severe drought conditions exceeds the recycled water demand.

The District further states, without support, that it has no intention of funding the improvements required to deliver recycled water, even though they are included in the District’s adopted Capital Improvement Plan. Comment R-13-73. The RDEIR acknowledges this funding uncertainty on page 4.14-44.

The District’s comment letter provides no explanation for the difference between the projections in the WSA and the position expressed in that letter. More recently, District staff
similarly provided no explanation to expert consultant Timothy Thompson. See Thompson Letter at 3.

The WSA, adopted by the District, is the District’s most recent official statement of policy regarding recycled water use. The District has not provided substantial evidence to change the WSA’s conclusions. The RDEIR therefore reasonably relied on the WSA and included increasing amounts of recycled water in its future water projections to offset potable water demand.

Moreover, the RDEIR discusses both the actions that the University will take if recycled water use within GWD does not increase as projected (RDEIR section 4.14), and the potential environmental impacts of such actions (RDEIR, pp. 4.14-45 to -48). Even if there is no increase in recycled water, the RDEIR demonstrates that GWD will still have sufficient water to serve LRDP-related and other regional growth in a normal year in 2025, the LRDP’s planning horizon year. By 2030, however, there would be a small deficit (17 AFY) if regional growth continues as projected and the District’s customers use no new recycled water. The mitigation measures that the University would implement under such circumstances, and the potential environmental impacts of such actions, are discussed on pages 4.14-45 through -48 of the RDEIR.

B. Water Duty Factors

Comments from the District and others state that the water duty factors used in RDEIR Section 4.14 underestimate the future water demand associated with the 2008 LRDP.

The text and table on RDEIR pages 4.14-30 to 4.14-32 describe the bases of the water duty factors that are used in the RDEIR. The water duty factor for residential development is based on metered University residential water use during 2004 and 2005, and was verified with 2005 and 2006 data. There is no reason to believe that water use was unusually low during these years. In fact, the more recent data from 2008 show roughly the same average per-unit residential water use.5

The RDEIR’s water duty factor for all non-residential University development (0.184 AFY per 1,000 square feet) is the average of the water duty factors for classrooms, laboratories, and other uses provided in Table A-15 of the 2005 UWMP, Appendix A. Table A-15 applies a water duty factor of 0.233 AFY per 1,000 square feet of floor area for “Classrooms/Laboratories” and 0.135 AFY per 1,000 square feet for “Office/Miscellaneous.”

While the precise future floor space associated with classrooms, laboratories and other uses will be determined at the time of development, Table 3.0-8 of the Draft EIR provides an estimate for assignable floor area for various uses. The table below includes the academic space estimate from Table 3.0-8 and the corresponding water duty factors from the 2005 UWMP. As the Table shows, the instruction and research space is approximately 50% of the total square footage, while the other 50% is comprised of various office and miscellaneous uses. Thus, the RDEIR reasonably applied the average of the 2005 UWMP’s water duty factors for these uses to the total assignable square feet designated for them.

As shown in the above table, applying the 2005 UWMP's water duty factors for specific uses to the estimated assignable floor area of those uses as shown in RDEIR Table 3.0-8 yields a future water demand of about 330.9 AFY, which is less than the 354 AFY calculated in the RDEIR due to an overestimation of assignable square feet. RDEIR Table 4.14-9 reports 1,900,000 assignable square feet and a wdf of 0.184, multiplying these numbers gives 349.6 AFY, as opposed to the 354 AFY reported in the Water Section. The RDEIR uses the higher number, thereby ensuring that is does not underestimate demand.

Similarly, applying GWD’s suggested water duty factor of 0.192/1,000 square feet (see Comment R-13-56) to the assignable floor area in the above table results in a future water demand of about 360 AFY, which is very close to the 354 AFY calculated in the RDEIR.

For more information, please see responses to comments R-13-54 through 57.

### C. Current Water Demand

In its comment letter, the District states that the University does not use the correct “baseline figure” for current potable water use. Specifically, GWD’s letter states “According to District records, the University’s most current potable water use was 687 AFY in 2008 and 703 AFY in 2007.” See Comment R-13-48. The District does not provide any support for this statement, but requests that the University use 700 AFY as the baseline water demand in the EIR.

The RDEIR’s analysis considers existing District-wide water demand, and determines how much demand development under the LRDP will add to that amount. The RDEIR does not base its impact conclusion on a comparison of University water use before and after the LRDP; CEQA does not require such a comparison and, moreover, that analysis would not be helpful in determining whether the District, overall, has sufficient water supplies to serve
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University and other growth. The portion of the District’s total current demand attributed to the University is not essential to the RDEIR’s analysis, but is included for informational purposes.

Furthermore, the RDEIR’s use of 872 AFY as the University’s current water demand is supported by substantial evidence. Table A-18 of Appendix A of the 2005 UWMP contains an estimate of the University’s water demand, which is based on the average demand from 1999 – 2005 (558 AFY) plus the water demand associated with previously approved but not yet constructed projects accommodated by the 1990 LRDP (256 AFY). Water demand from existing University-owned housing projects (58 AFY for El Dorado, Westgate and Santa Catalina) was then added to these figures, for a total current water demand of 872 AFY. The RDEIR reports this 872 AFY demand on page 4.14-23.

Potable water deliveries to the University by the District have increased since 2006 because some of these previously approved projects (i.e., San Clemente Student Housing) have since been constructed and are currently occupied. Other previously-approved projects have not been constructed. Water for these approved but not built projects is counted as existing demand in both the 2008 WSA and the RDEIR, but is in fact available for future growth. In order to make a conservative estimate of the present demand, however, the RDEIR will continue to rely on the 2008 WSA’s estimate of current demand.

D. University Permits

Several comments on the Draft EIR concern that document’s treatment of various permits and agreements concerning the water supplies for different parts of the Campus. These include Permits 14 and 16 and the 1991 Water Reclamation Agreement. The analysis in the RDEIR considers Campus water demand as a whole. The RDEIR does not analyze demand and supply on individual portions of the Campus, and does not assume that any permits or agreements entitle the University to any particular amount of water. (Appendix A to the RDEIR does provide, for informational purposes, a breakdown of future demand by on-Campus water service areas.)

CEQA does not require the RDEIR to include a legal discussion of the agreements between GWD and the University pursuant to which the District will provide water for LRDP-related growth. Instead, the RDEIR must determine whether sufficient water is available for such growth, and must analyze the associated potential significant effects on the environment. Through its analysis of water demand and supply for the affected water service district, the RDEIR concludes that, with mitigation, GWD will have sufficient water supply to meet demand from growth under the LRDP and other growth within its service area through 2030.

E. Cumulative Demand

Several comments question the scope of the RDEIR analysis of cumulative water demand. The RDEIR explains the basis of its cumulative water demand projections on pages 4-14-18 to -20. The RDEIR’s analysis of cumulative water supply and demand uses data from the District’s 2008 WSA and 2005 UWMP. RDEIR, p. 4.14-18. According to the 2008 WSA, the projection of future water use includes "data from land use jurisdictions in the [GWD’s] service area – City of Goleta, University of California, Santa Barbara Airport (City of Santa
Barbara), and Santa Barbara County (Isla Vista and other unincorporated areas).” 2008 WSA, p. 15. In other words, the WSA’s projection show the amount of population (and therefore water demand) that could be accommodated in its service area under existing land use regulations.

Commenters question whether the RDEIR’s cumulative water supply analysis properly accounted for the job and population growth indirectly caused by the LRDP. The RDEIR states that the LRDP will result in 2,200 indirectly-generated jobs in the region. RDEIR, p. 4.10-36. All of these workers will not necessarily reside within the GWD, instead they could live in surrounding communities. For those workers who will reside in the District, the 2008 WSA accounts for their water use by including projections of future residential growth within the District, as discussed above. The WSA’s population and demand projections set an outer limit for future growth, because they draw on population projections based on land use constraints. Therefore, the cumulative demand projections in the RDEIR fully account for the projected residential growth within the District, including growth indirectly attributable to the LRDP.

VI. Mitigation

Several comments question the enforceability of the mitigation measures proposed in the RDEIR. For public projects, CEQA Guidelines section 15126.4(a)(2) provides that “mitigation measures can be incorporated into the plan, policy, …or project design.” That incorporation will be done at the time of approval of the LRDP. Specific concerns regarding individual mitigation measures are addressed below.

A. Mitigation Measure W-3G.

Under Mitigation Measure W-3G, the University will halt LRDP development if, following implementation of numerous conservation measures (Mitigation Measures W-3A to W-3E), demand for water still approaches the available supply, and additional water cannot be acquired. This measure requires project-specific water availability analyses as new buildings are proposed, thereby creating a system for the University to monitor the water supply and demand balance as each individual project in the LRDP is developed. RDEIR, p. 4.14-35. For areas subject to the 1991 Water Reclamation Agreement, this measure will halt development when demand is projected to be within 50 AFY of available supply. RDEIR, p. 4.14-35.

If small increases in enrollment were to occur after Mitigation Measure W-3G is triggered and development halted, they would not result in a significant impact on water supply. As explained on page 4.14-48 of the RDEIR, the water demand per student is 0.171 AFY. Thus, enrollment would need to increase by approximately 290 students for demand to exceed the remaining 50 AFY of supply.

Enrollment increases of this magnitude are unlikely in the absence of new development. To provide the instructional space to serve new students, the University must build the new classrooms and laboratories identified in the LRDP. Without new development, the University will not have sufficient facilities to increase its enrollment significantly. Similarly,
the University’s hiring of faculty and staff would depend on having offices, laboratories, and other administrative space available for these employees.

Several comments question the validity of this mitigation measure, citing Vineyard Area Citizens v. City of Rancho Cordova (2007) 40 Cal. 4th 412, 432 for the proposition that that “[t]he law’s informational demands may not be met simply by providing that future development will not proceed if the anticipated water supply fails to materialize.”

The Vineyard case holds that a mitigation measure halting development may not replace the required analysis of possible sources of water or alternatives to use of the anticipated water, and of the environmental consequences of those contingencies. After a “sincere and reasoned attempt” at such analysis, however, a mitigation measure linking development to water availability may play a role in the impact analysis. Accordingly, in order to adequately inform decision makers and the public, it is appropriate for the EIR to discuss the potential that the intended water sources for later phases of development may not be found, the environmental impacts of curtailing the project before completion, and mitigation measures planned to minimize any such significant impacts. The RDEIR does not seek to substitute Mitigation Measure W-3G for a careful analysis of water supply and demand. Instead, the RDEIR contains a thorough analysis and then, recognizing various uncertainties inherent in California water planning, provides a contingency plan. See RDEIR, pp. 4.14-34 to -49.

B. Mitigation Measure W-3F

Mitigation Measure W3-F requires the University to work to identify and acquire additional water supplies beyond those currently available to GWD, as necessary, to serve UCSB potable water demand independently or with GWD, as appropriate. Certain commenters state that this mitigation measure is not feasible, claiming that no additional water supply or capacity to deliver such supply is available. However, Carpinteria Valley Water District has indicated that it has allocated State Water Project water that is available for transfer.6

To procure and deliver additional water, the University may be required to obtain certain approvals or enter into contractual agreements. The Central Coast Water Authority (CCWA) administers the delivery of the SWP water to the member agencies. Any approval of a transfer between member agencies will require the approval of CCWA. To obtain the capacity to transport water, the University may be required to enter into a wheeling agreement with GWD. According to GWD staff the existing conveyance facilities have sufficient infrastructure capacity to accommodate the delivery of additional water from the State Water Project above what is currently contracted to agencies in the South Coast area, including GWD.7

C. Feasibility of Other Individual Mitigation Measures

1. Mitigation Measure W3-A

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7 Source: Gary McFarland, Goleta Water District consultant, personal communication March 2008.
Mitigation Measure W3-A will free up potable water supplies for other uses by using recycled water for University uses that would otherwise draw on potable supplies. This measure will build on the University's use of recycled water irrigation on the campus grounds since 1994. See Draft EIR, App. 4.16-1. Currently, the University's irrigation uses 154 AFY of recycled water. RDEIR, p. 4.14-47. Under Mitigation Measure W-3A, the LRDP’s new playfields and landscaping will use recycled water for irrigation. RDEIR, p. 4.14-47. As noted on page 4.14-25 of the RDEIR, the University Main Campus received on average 143 AFY per year between the years of 1999 to 2004. This amount is expected to increase with the University implanting more water conservation measures across the campus and using more recycled water for outdoor uses in new developments. The GWD is expected to increase recycled water delivery capabilities, as noted on RDEIR page 4.14-6.

To acknowledge the health standards associated with recycled water use, Mitigation Measure W-3A will be amended as follows:

“New UCSB development shall make use of recycled water to the maximum extent feasible. Recycled water will be used for bathroom fixtures and/or irrigation consistent with relevant health standards for such use.”

Commenters (R-13-60 and R-19-12F) recommended that the language of Mitigation Measure W-3A be amended to require the application of recycled water to both irrigation and bathroom fixtures. The current language allows either to be used to the maximum extent feasible. This approach improves the efficacy of the mitigation measure, because it may prove more feasible to maximize the use of recycled water using either bathroom fixtures or irrigation.

2. Mitigation Measure W-3B

Mitigation Measure W-3B requires the University to individually meter and/or sub-meter all new UCSB living units or buildings and institute water charges on a per unit basis with a graduated fee structure. This mitigation measure will provide a financial incentive for water conservation to residents of UCSB living units and occupants of UCSB buildings. Consumption-based pricing is widely recognized as providing an incentive for water users to reduce consumption. See, e.g., Assembly Bill 2882 (2008). Consumption-based pricing typically reduces water use from 10-30%, but can achieve water use reductions as high as 50%. Lisa Maddaus, Effects of Metering on Residential Water Demand in Davis, CA 2 (March 2001), available at: http://www.cuwcc.org/docDetail.aspx?id=1856.

The RDEIR states that all apartments, townhomes, and detached units will be metered and recognizes that dormitory rooms cannot be individually metered (RDEIR, p. 4.14-47). Assuming four students per non-metered dormitory unit, the housing units that can be metered comprise about 64% of all new housing under the LRDP. Therefore, the majority of new University housing will be subject to the graduated fee structure. In addition, Mitigation W-3B has been revised as follows:

Individually meter and/or sub-meter all new and existing UCSB living units or buildings and institute water charges on a per unit basis with a graduated fee structure that is revenue neutral to the University.
3. Mitigation Measure W-3C

Mitigation Measure W-3C requires the University to install water-saving devices including shower heads, toilets, urinals, washing machines, and irrigation systems. Such water saving devices provide considerable overall water savings. For instance, according to data on the Santa Barbara County Water Providers website, older showerheads can consume five times more water than low-flow models. Similarly, high efficiency clothes washers use 35-50% less water than conventional models.

The RDEIR notes that the University has already undertaken an extensive retrofit for existing buildings, but that there are still further reductions in water usage which can be achieved. RDEIR, p. 4.14-47. In addition, Mitigation W-3C has been revised as follows:

LRDP Mitigation W-3C: The University shall install water saving devices in all buildings and facilities, new or existing that do not currently have them, and shall continue to use existing water saving devices. The water saving devices that will be installed shall include, but will not be limited to, the following: shower heads, toilets, urinals, washing machines, dishwashers, hot water recirculation systems, and irrigation systems.

4. Mitigation Measure W-3D

Mitigation Measure W-3D requires the University to create a public awareness campaign for saving water. As the RDEIR notes, an EPA study has demonstrated a 1.2% reduction in dormitory water use through a simple education campaign (RDEIR, p. 4.14-48). The public awareness campaign will be designed to target the water uses where reductions are most likely to be achieved. In particular, the University has achieved water use reductions by requesting students to take shorter showers (RDEIR, p. 4.14-48).

5. Mitigation Measure W-3E

Mitigation Measure W-3E requires the University to develop a campus Water Conservation Program. By compiling the water conservation strategies into a single Water Conservation Program and monitoring its success, the University will be able to identify future opportunities for water conservation and design targeted strategies to achieve reductions.

In addition, Mitigation Measure W-3E requires the development of systematic water use reduction measures to be implemented during multiple dry years. These dry year measures will include education, voluntary curtailment, water rate designs to encourage lower consumption, and reducing University irrigation. RDEIR, p. 4.14-48. Reducing the irrigation of landscaping would reduce the demand associated with the portion of University....

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landscaping currently irrigated with potable water (about 10% of the University’s irrigation usage). This measure would also establish a priority system to implement measures based on the intensity and duration of the drought. RDEIR, p. 4.14-48. By doing so, the University will have in place a systematic water conservation strategy that responds to the changes in water supply as they occur.

2.2 Master Response - Traffic Fair Share Mitigation

This Master Response addresses comments pertaining to the method used for determining the University’s share of transportation costs to mitigate impacts of implementing the LRDP.

Traffic Model

UC Santa Barbara’s fair-share of roadway improvements identified in the City of Goleta General Plan was determined using an updated version of the City of Goleta travel demand forecasting model\(^{10}\) to analyze impacts to the regional traffic system, including Santa Barbara County. The City of Goleta General Plan states that UC Santa Barbara shall contribute its fair-share to fund the City’s transportation improvements. The methodology for determining UC Santa Barbara’s fair-share is summarized as follows:

- The City’s General Plan roadway improvements were coded into the cumulative-plus-project travel demand models for each of the proposed LRDP roadway network scenarios.

- A select zone analysis was conducted to track all p.m. peak hour vehicle-trips to and from UC Santa Barbara (Main Campus, Storke Campus, and West Campus) under cumulative no project and cumulative plus project conditions.

- The number of UC Santa Barbara trips using the City’s future roadway improvements under cumulative-no-project and cumulative-plus-project conditions was recorded.

- To determine the LRDP’s impact on the City’s roadway network, the growth in UC Santa Barbara trips between no project and plus project conditions was calculated (UC Santa Barbara plus-project trips – UC Santa Barbara no-project trips = LRDP trips on City roadways).

- The number of LRDP trips was compared to the total p.m. peak hour traffic volume on the roadway facility to determine the LRDP’s percentage of trips using the roadway.

The following discussion presents the fair-share results based on the method described above. As shown in Table 4.13-52, below, copied from page 4.13-118 of the RDEIR, UC Santa Barbara’s fair-share percentage of LRDP traffic on the City’s roadways varies based on the

\(^{10}\) LRDP RDEIR, Section 4.13, Table 4.13-51.
proximity of the roadway to campus. The fair share of LRDP traffic for several roadways that are not proposed to be improved as part of the City’s General Plan, such as El Colegio Road, Storke Road, and Los Carneros Road, is also shown in the table for informational purposes.

Typically, traffic impact fee programs are designed to charge new development for roadway improvements needed to accommodate planned growth. Therefore, the fair-share percentages reflect new UC Santa Barbara trips generated by the proposed LRDP, and do not include existing campus trips.

Roadway Improvements

For intersections and roadways significantly adversely affected by UC Santa Barbara growth under LRDP Conditions, and not otherwise mitigated through implementation of LRDP or other traffic mitigation measures, UC Santa Barbara will pay its proportional share of off-campus transportation improvements as projects implementing the LRDP are approved. The table below (Table 4.13-52 in the EIR) illustrates this proportional-share mitigation approach. The University’s share of off-campus transportation improvement costs will be determined based on the following approach:

- The impact of UC Santa Barbara’s traffic on local intersections and roadways will be calculated using the refined version of the City of Goleta traffic demand forecasting model (PTV VISUM) updated for the 2008 LRDP.

- Future traffic conditions will be assumed in the model to include cumulative growth as represented in adopted comprehensive plans from the City of Goleta, County of Santa Barbara, and UC Santa Barbara LRDP (e.g., General Plans, Specific Plans, etc., in effect at the time the model is run).

- A conclusion of significant impact to an off-campus intersection or roadway from UC Santa Barbara growth will be made if the applicable jurisdictions adopted acceptable Level of Service standard is exceeded.

- The University’s financial contribution towards off-campus intersection or roadway improvements will be determined based on its proportion (percentage) of increased future traffic volume through the significantly impacted facilities.

- Engineering estimates will be made for the costs of the transportation improvements based on each jurisdiction’s adopted Transportation Improvement program.

- The total costs of improvements will be escalated over time based on generally accepted indexes of construction costs, i.e., ENR.

- The University’s funding for the improvements will be made available to the jurisdiction no later than the start of construction or when implementation of the improvement is reasonably certain.

- To account for changes in traffic patterns, variances in traffic modeling, and other
unforeseen circumstances, a monitoring program will include at least annual updates of traffic counts and a comprehensive five-year reassessment including new model runs and verification.

2.3 Master Response - Fiscal Impacts

This Master Response addresses comments pertaining to fiscal impacts on local governments and communities associated with implementation of the proposed 2010 LRDP.

"An economic or social change by itself shall not be considered a significant effect on the
Because CEQA provides for analysis of environmental impacts, but not social and economic impacts, the analysis in the LRDP EIR is limited to whether a proposed project would have a substantial adverse effect on the physical environment (otherwise known as a “significant environmental impact”). The effects of a proposed project on staffing and support for police services, fire protection and other public services are relevant under CEQA only to the extent that they involve the expansion of existing facilities or construction of new facilities, which may result in significant environmental impacts. Accordingly, the potentially significant environmental impacts associated with the construction or alteration of a fire or police station, school or library facility are addressed in the Section 4.11 of the DEIR. The EIR concludes that implementation of the proposed 2010 LRDP would not result in significant environmental impacts associated with the provision of new or altered public service facilities, either on campus or off-campus services, except for impacts associated with the need for expanded County Fire Department services and facilities (DEIR, p. 4.11-18) and elementary school facilities (DEIR, p. 4.11-24).

The County of Santa Barbara provided comments on the fiscal impact to County services related to operation of the University and the implementation of the LRDP. The County’s comments are based on a report prepared for the County by Economics & Planning Systems (EPS). Many of the EPS comments are outside the purview of CEQA, because the EPS report is focused on economic, fiscal, and non-physical environmental impacts.11

University of California, Santa Barbara Economic Impacts

UC Santa Barbara is the largest employer in Santa Barbara County, with more than 9,700 employees, as shown in the “Top Employers in Santa Barbara” table on the County’s website. According to the UC Santa Barbara Economic Forecast project,12 UC Santa Barbara generates an additional 9,300 employees when projected in direct and induced employment is taken into account. The total economic impact of UC Santa Barbara and the spending it generates in the County goes far beyond the limited methodology employed by EPS. UC Santa Barbara spends about $239 million annually in wages and salaries (FY1999-2000 figures). The presence of more than 16,000 UC alumni in the region provides a highly skilled workforce for the many new companies in the area’s growing technology sector. UC Santa Barbara students contribute more than $135 million to the local economy each year in direct retail and service expenditures. This translates into an estimated 3,000 jobs in these sectors.

Approximately 80 percent of UC Santa Barbara’s annual operating expenditures of $437 million is spent in Santa Barbara County. An additional $60 million goes to capital expenditures. About 120 alumni and faculty members of the UC Santa Barbara College of Engineering have started nearly 100 high-tech companies, about half of them located on

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11 This response was in part prepared by the economics firm of Stanley Hoffman Associates. (S. Hoffman Memorandum to C. Clark re Additional Review & Observations regarding the Fiscal Impacts of UCSB’s LRDP prepared by EPS, Final Draft Report, June 2008 (January 8, 2008).) Stanley Hoffman Associates is an urban economics and financial consulting firm established in 1981 that provides economic analysis, fiscal and financial analysis, and real estate market research for the public and private sectors. (See Qualifications of Stanley R. Hoffman, FAICP, President, Stanley R. Hoffman Associates (June 6, 2010).)

California's Central Coast. In addition, many major companies now operate in the Santa Barbara area because they have acquired UC Santa Barbara spin-off companies. Ericsson, Hewlett-Packard, Microsoft, and Texas Instruments are just a few of the many major international companies that have acquired UC Santa Barbara spin-offs. Looked at another way, if the University were to suddenly vanish, the loss of its approximately $1 billion economic impact would decrease the Santa Barbara economy by about 5.3 percent, which is more than the University’s percentage of the County’s population, with the accompanying loss of jobs and household income.

**Capital Improvement Costs**

The methodology used by EPS, estimating UC Santa Barbara’s impact on capital facilities by using the County’s existing impact fee rates, does not establish the basis for an AB 1600 nexus between UC Santa Barbara and the capital facilities that the County’s development impact fees would finance. The approach EPS describes in imposing the County’s current development impact fees on UC Santa Barbara is unsupportable because, as EPS observes, “…the growth proposed in the LRDP was not anticipated under existing fee programs.” In other words, the fee estimate of $92.6 million attributable to the University by EPS (Table 11, page 26) is not supported by a nexus study because the LRDP was not included in the nexus studies that were performed to establish these fees.

To estimate the capital cost impact issue, a study would need to be prepared to estimate the fair share of the LRDP’s impact on affected public facilities. The fair share methodology would need to use a reasonable estimate of the LRDP’s impact based on substantial evidence. EPS provides no support, other than the assumption that “For the purposes of analysis, student beds, a typical measure for the size of a residence hall, have been converted to apartment units at a rate of two beds per unit” (p. 25, footnote 7). The determination of UC Santa Barbara’s fair share of County public facilities should be based upon either a “causes the need for” or “uses or benefits from” test. It is not obvious, for example, that a two bedroom dormitory room is equivalent to a private sector apartment unit for either of these tests. Such a determination would need substantial evidence to support that assumption.

**Cost Methodology**

The per capita methodology used by EPS is not appropriate for estimating the atypical cost impacts of UC Santa Barbara on County facilities and services. Each facility and service should be examined using a case study methodology with real data regarding who uses or benefits from the service (such as calls for service, tabulation of clients, how UC Santa Barbara provides services to students and faculty/staff, etc.). The “adjusted cost” methodology employed by EPS—based primarily on EPS’s assumption of how students spend time on campus or in Isla Vista or by equating two student beds to one apartment unit—is not a real measurement of the relationship of UC Santa Barbara to the community because it does not account for how the activities of campus affiliates support County tax revenue or how the University itself supports community activities. Any study basing costs on simply how affiliates spend their time would inherently overlook when and where affiliates spend money and contribute in other ways to County tax revenues. It would also not account for benefits which non-campus affiliates and County residents at large receive from the University. Therefore, the EPS study does not constitute credible evidence for the purposes of
a cost methodology.

For example, the comparison of EPS’s estimated annual operating costs per student shows a 2.9 times difference between the LRDP and the existing campus as shown below:

1) Existing UC Santa Barbara -- $490 per student ($10.5 million/21,410 existing students)
2) Proposed LRDP -- $1,420 per student ($7.1 million/5,000 net new students)
   (Estimated costs are from Table 3, page 8, and student estimates are from Table 1, page 2.)

There is no explanation by EPS, however, of the large difference between the cost per student to the County of the proposed 2010 LRDP compared to the County’s existing estimated per student cost. Even if the ratios are prepared on a student plus faculty/staff basis using EPS’s figures, the ratios would still be very disproportionate, at $382 per existing student/faculty/staff compared to EPS’s estimate, which would amount to $1,052 per future student/faculty/staff. EPS does not provide any evidence of why these differences would be so large; therefore, the University finds these estimates by EPS to be unsupported and non-credible.

Revenue Methodology

The EPS report tends to understate revenues generated to the County from the presence of UC Santa Barbara because it focuses narrowly on direct UC Santa Barbara expenditures. As discussed earlier, UC Santa Barbara is a significant economic generator in the County; currently the University brings in large sums of funding for education and research that go beyond direct expenditures by the University and that have a multiplier effect throughout the region.

In 1994, the firm of Sedway and Associates prepared a fiscal study for UC Santa Barbara (the “Sedway study”13) for the purpose of identifying how the University contributes to service and infrastructure impacts on the County. The Sedway study did not look at the multiplier effect of UC Santa Barbara on the County, but it looked comprehensively at the sources of revenues to the County. As stated in the study:

> Since the analysis includes the cost to service the UC Santa Barbara off-campus population, the revenue calculations also take into consideration the primary sources of County revenue generated off-campus by UC Santa Barbara’s Santa Barbara resident population. These sources include retail sales taxes and property taxes. Both retail sales and property taxes are considered “indirect” revenue for purposes of this study since the source is UC Santa Barbara’s population rather than the University (p. 16 of Sedway study).

Also, the Sedway study estimated impacts on a countywide basis as well, instead of arbitrarily assuming, as EPS did, that impacts were “neutral” outside of the immediate area of UC Santa Barbara and Isla Vista. On page 4 of their report, EPS states:

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Since UC Santa Barbara-related population and employment in other areas of the County is more diffuse and integrated with other land uses, its net budgetary impact is assumed to be negligible (p. 4 of EPS study).

Also, it appears that State gasoline tax subventions were not considered in the EPS report, as this revenue source is not mentioned. While gasoline taxes are not a General Fund revenue source, they are a major source of funding for road maintenance and capital construction.

**Net Fiscal Impact**

Similar to the discussion above relating to costs, the comparison of EPS's estimated Net Fiscal Impact per student shows a 6.8 times difference for the 2010 LRDP compared the existing campus, as summarized below:

1) Existing UC Santa Barbara -- $150 per student ($3.2 million/21,410 existing students)
2) Proposed LRDP -- $1,020 per student ($5.1 million/5,000 net new students)

(Estimated costs are from Table 5, page 11, and student estimates from Table 1, page 2.)

Again, there is no explanation by EPS for the large difference between existing conditions and the 2010 LRDP. Even if the ratios are prepared on a student plus faculty/staff basis using EPS's figures, the ratios would still be very disproportionate, at $116 per existing student/faculty/staff compared to EPS’s estimate, which would amount to $756 per future student/faculty/staff. Again, for the reasons stated above, the University finds the EPS estimate to be unsupported and non-credible.

Also, EPS has provided long-range projections to 2025 of County fiscal deficits. Given the uncertainty of such an undertaking, and the generally unsupported nature of EPS's methodology and conclusions, it is of questionable accuracy to make such a long-range projection that could be influenced by any number of variables that were not considered by EPS.

**Isla Vista**

EPS estimates that the 2010 LRDP “… will have a “spill-over” affect in other areas of the County and thus affect County public service responsibilities.” (EPS, page 4). EPS then assumes, however, that all of these spillover effects would occur only in Isla Vista and that the fiscal effects of the 2010 LRDP would be neutral in the rest of the County. This assertion is not supported by any evidence. While fiscal impacts from UC Santa Barbara expansion on Isla Vista are likely, they should be identified and handled on a case-study basis, using actual evidence, and not by simply assuming that “… UC Santa Barbara students residing on-campus typically spend about 12 waking hours in Isla Vista while students residing in Isla Vista spend about 28 waking hours on campus.”

Moreover, EPS's determination of the Isla Vista service population is incorrect. For example, if on-campus residents were to spend 12 waking hours in Isla Vista per week, presumably the businesses in Isla Vista would benefit greatly from having a nearby population and those
businesses generate taxes and other revenues for the County. As a matter of analysis, if a new shopping center were built to support a particular population, the residents who shop at that center would not be required to offset fiscal costs associated with the center. To the extent there would be any offsets, they would be assigned to the center.

EPS should explain why off-campus residents are included in the analysis because: (1) their costs would typically be covered by whatever fees are charged to the private developers of new housing or businesses to service them; (2) to the extent that existing housing and commerce will support the new population, the new population would be credited with increased taxes and fees generated in and by those existing establishments; and (3) reviewing Isla Vista resident impacts is irrelevant and therefore unnecessary, because all new 2010 LRDP enrollment growth will be accommodated on campus.

Similarly, because all new 2010 LRDP growth will be accommodated on campus, if the new residents go to Isla Vista for “entertainment and commercial opportunities,” the increased property and sales taxes (as well as fees and other revenues) generated by those entertainment and commercial establishments should be attributable to those new campus residents. However, the EPA analysis selectively and incorrectly attributes costs to residents going off campus for support services, but does not credit all corresponding revenues generated ("secondary impacts") to them.

Attributing costs both to on-campus residents and to on-campus institutional development amounts to, at least in part, double counting.

Conclusions

CEQA. The EPS study looks at the fiscal impacts of UC Santa Barbara on the County of Santa Barbara both currently as well as those that would be generated by the LRDP in the future. EPS covers all current UC Santa Barbara activities as well as the LRDP and covers a very broad range of County expenditures and revenues, most of which are unrelated to any CEQA concerns. It is not clear in the EPS report which impacts, if any, the County believes are properly of concern to the LRDP CEQA process.

EPS Findings. EPS does not provide a reasonable basis for concluding that UC Santa Barbara generates a large negative fiscal impact to the County. However, the report does identify instances in which UC Santa Barbara-County cooperation in municipal service delivery might be improved. UC Santa Barbara and the County should explore ways these impacts can be verified, measured and addressed.

Capital Improvement Costs. EPS argues that UC Santa Barbara should pay development impact fees, and that not having done so in the past has resulted in a large shortfall in UC Santa Barbara payments to the County. By law, development impact fees can only be used to pay for specified capital improvements identified at the time the fees are adopted. The EPS conclusion implies that any such public improvements that are required to serve UC Santa Barbara were either (a) paid for by other County funds or (b) were not constructed or acquired, thereby creating significant public improvement deficiencies. The approach, however, ignores prior “fair-share” contributions by the University to the County and agreements between the County and the University. The EPS report should have verified and
documented the existence of either of these two conditions which are attributable to University related growth.

Concluding that UC Santa Barbara’s fair share should be the same as any private developer’s is not supported by how UC Santa Barbara is treated elsewhere in the EPS report. Furthermore, it fails to account for the infrastructure (e.g., parks, libraries, etc.) that is provided by the Campus and made available to the general population of the County residents.

While an AB 1600 study is necessary and legally required to justify local government fees, it is not methodologically suitable for determining the regional fiscal effect of public universities. For instance, the increased UC Santa Barbara population due to the 2010 LRDP will reside within walking/biking distance of the heart of campus. This is the mitigation for traffic impacts, not the cause of adverse fiscal impacts to the community.

Fiscal Impact Analysis. The kind of fiscal impact analysis performed by EPS is not appropriate or useful in the present application. The fact that two independent studies of UC Santa Barbara’s impact on the County (the Sedway & Associates’ essentially breakeven fiscal analysis and the EPS report’s extremely negative fiscal analysis) came to very different conclusions suggests that methodology and assumptions inherent in such studies do matter. Moreover, the important impacts that a major public university has on the broader community and economy are ignored when only the direct expenditure and revenue flows out of and into the County General Fund are considered as is the case in the EPS study.

The EPS analysis is limited and does not consider the impacts on the County of Santa Barbara economy. Moreover, the EPS report’s assumptions fail to be supported in many cases and fall short in identifying the full revenue and cost impacts. Fiscal impacts to key public services, including police, fire, parks and recreation and transportation, should be considered on a case-study basis for both operational and capital costs. This will provide a basis for the University and the County to resolve any fiscal discrepancies.

EPS does not make clear how an existing institution of 20,000 students would generate costs to the County of $10.5 M, while an increase of about 25% population, entirely on-campus, creates $7.1 M in additional costs?

It is not reasonable to assume that the state-municipal finance arrangements extant at the time of the EPS report will continue into the future. The entire basis of state-municipal and state-higher education relations is changing in ways that severely limit the applicability of the analysis.

EPS does not fully or fairly consider the fact that the UC Santa Barbara population is generally young, insured, childless, healthy, relatively well-off and well-educated, and that UC Santa Barbara provides health services, recreation and open space facilities, police support, fire support, and libraries to the general population of the County.

2.4 Master Response - Housing and Population

This Master Response addresses comments pertaining to the LRDP’s impact on the area’s
hiring supply. Many of these comments relate to the relationship between housing construction and campus enrollment, including issues such as development guarantees, the timing of creation of new housing, and the lag between population increases and the availability of housing units. Other comments concern the “jobs multiplier” or increase in non University-affiliated employment in the community generated by the growth of the University. Also some comments pertain to retiring faculty and their impact on regional housing supply.

These and other issues were analyzed in sections 4.10 Population and Housing and section 6.2 Indirect Economic Growth of the DEIR. The discussion of population and housing and indirect economic growth was then combined, put into the revised section 4.10 Population and Housing of the RDEIR, and the analysis was augmented in the areas of indirect effects on housing, the effect of staff and faculty retirement, and regional housing impacts.

The mitigation proposed in section 4.10 Population and Housing (the discussion of Impact POP-3) will require the University to track progress toward the goal of balancing housing with enrollment capacity increases on an annual basis. This measure accounts for the necessary lag time to construct new housing, because it is impractical to increase housing at precisely the same time as increases in enrollment capacity. Planning, permitting, funding and construction take time. As discussed in recirculated section 4.10, the University has considerable flexibility in managing its existing housing supply, pending construction of new housing, by making changes in apartment occupancies and arrangements with off-campus housing suppliers. This flexibility is necessitated by the normal year-to-year fluctuations in enrollment. Mitigation Measure POP-3A requires the University to provide new housing within four years of enrollment increases that exceed the available University housing. Despite this commitment, the recirculated EIR section acknowledges that enrollment increases could have a significant impact on regional housing during that four-year lag, and, therefore, determines that the impact remains significant and unavoidable (please see RDEIR pp. 4.10-30 to -33).

Due to the uncertainties involved in planning, financing, and constructing campus housing developments, the availability of housing will never exactly match housing needs, with either an excess or shortage at any given time. Four years, from planning and design to permitting and construction, is the amount of time the University can reasonably expect will be required to provide new housing for existing demand or anticipated to meet increased demand, from planning and design, to permitting and construction. Hence, the University has determined that this is an appropriate and feasible time frame within which to plan and build new housing.

The annual analysis of housing called for in Mitigation Measure POP-3A will include a review of the residential market in off-campus housing. The analysis to be undertaken is summarized as follows:

- Total student headcount for the past academic year and projected increase during the current academic year.
- Total student housing units on campus for the past academic year and projected new housing to be constructed during the current academic year.
- Relationship of new and total number of the number of student housing units that exist and are planned to be constructed within four years.
- Total enrollment for the past academic year and projected increase during the current academic year.
• Total faculty/staff units for the past academic year and projected new units to be constructed during the current academic year.
• Relationship of projected enrollment increases to the number of beds that exist and are planned to be constructed within four years.

A finding by UCSB in any given year that the University is not making sufficient progress towards the above-stated goal shall require taking some or all of the following measures to increase progress:

• Review area housing supply for students and families. If there is an identified shortfall:
  • Accelerate planning for on-campus housing

In the event of an identified shortfall in housing in the interim until more University housing can be built, the University shall take one or more of the following actions as necessary to relieve an interim housing shortage:

• Increase the per-room occupancy of existing residential facilities
• Seek off-campus housing opportunities such as motels or apartment complexes, which could be leased to the University for a short period of time
• Temporarily convert living spaces such as lounges to bedrooms

The DEIR assumed enrollment increases would occur at an even annual rate over the 2010-2025 planning timeframe, and that the new enrollment provided for under the LRDP would arrive at the campus at a rate of approximately 300 new students per year (which is equivalent to roughly 1.5% per year of the total enrollment over the planning period of the 2010 LRDP), 19 new faculty per year, and 82 new staff per year. While enrollment and hiring increases can be planned and altered on an annual basis, housing projects require a longer lead time to secure financing, plan and design, complete environmental review, and construct. New beds to accommodate the annual 2010 LRDP growth, therefore, may not become available the year they are first needed.

In addition, fluctuations in the economy and state budget may affect the development of enrollment capacity and housing on campus. For example, the dramatic changes in 2008 and 2009, which have continued in 2010, have already affected the University system’s ability to deliver new enrollment capacity. Growth anticipated just two years ago, for example, will be deferred while the economy recovers, according to the University.

The LRDP states an overall goal of providing sufficient housing for new enrollment and substantially increased housing opportunities for faculty and staff, but does not guarantee that new housing will be available at the same time as new employees and new students arrive on campus, due to the lead time necessary to develop new housing. Redevelopment and renovation of existing campus housing to help meet housing goals, combined with the uncertain pace of housing construction, could lead to temporary impacts to study area communities, as explained in the recirculated DEIR Section 4.10 (p. 4.10-32 to -33).

Implementation of Mitigation POP-3A, will provide a means of tracking housing development and ensuring measures are undertaken to achieve stated goals, thereby reducing the imbalance of housing and employment/enrollment and any corresponding impacts on surrounding
communities. As explained above, housing and enrollment would be quantified annually, reflecting year-to-year fluctuations in the ability of the on-campus housing supply to absorb new employment. This tracking system would not reduce temporary impacts, but help reduce potential long-term impacts of institutional development outstripping available campus housing.

Study area communities could see temporary increases in demand for housing from campus-affiliated populations during the time it takes the on-campus housing supply to catch up with enrollment growth. By requiring sufficient on-campus housing to be created within four years after an increment of enrollment growth, Mitigation Measure POP-3A ensures that any University contribution to housing demand will be short-lived. The LRDP programs sufficient housing to accommodate all new 2010 LRDP growth. Payment of in-lieu fees to another entity for replacement housing is not part of Mitigation Measure POP-3A because it is not considered feasible or effective. It is highly unlikely that new housing could reliably be planned, approved and constructed by an entity other than the University in a shorter time frame.

Regardless of the implementation of Mitigation Measure POP-3A, temporary impacts to surrounding communities would occur. This impacts is, therefore, considered significant and unavoidable as explained in the RDEIR (p. 4.10-32 to -33).

Growth Inducing Impacts

CEQA Guidelines Section 15126.2(g) requires that an EIR evaluate the growth-inducing impacts of a proposed project. This Guidelines section defines growth-inducing impacts as “the way in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are [public works] projects, which would remove obstacles to population growth. Growth is not assumed to be necessarily beneficial, detrimental, or of little significance to the environment.” Consistency of the proposed 2010 LRDP with regional growth projections and the land use plans of the surrounding cities and the County is addressed in Sections 4.8, Land Use and Planning, and 4.10, Population and Housing.

According to the court opinion in Napa Citizens for Honest Government v. Napa County Board of Supervisors (2001) 91 Cal App. 4th 342, 367-371 [11 Cal. Rptr. 2d 579], the level of detail required when analyzing growth-inducing impacts depends on factors such as the “directness or indirectness of the contemplated impact and the ability to forecast the actual effects the project will have on the physical environment.” The impacts of the proposed 2010 LRDP are addressed in the topical sections of this EIR. In addition to the impacts from 2010 LRDP development, however, the project is likely induce growth in several other, indirect ways, as discussed in the following paragraphs. The Napa Citizens opinion also states that “less detail… would be required where those effects are more indirect than effects felt within the project area, or where it is… difficult to predict them with any accuracy” (id., p. 369).

The University influences housing in several ways. UC Santa Barbara is a large institution with a large workforce and student population, especially compared to the size of the surrounding municipalities. The secondary workforce that supports the University-affiliated population is large as well. Increases in the enrollment will increase this secondary workforce, creating
additional demand for area housing. In addition, relatively large numbers of UC Santa Barbara faculty and staff are projected to retire over the next ten years, and the replacements for retirees will create further demand for new housing if the retirees remain in the study area. Finally, temporary housing shortages could occur while existing housing, like Storke Family Housing, is redeveloped. Each of these scenarios is discussed below.

**Economic Impact of Indirect Job Generation.** The University has a substantial impact on the local and regional economy. It is the largest employer on the Santa Barbara County coast, and puts money into the local economy through University expenditures and through the spending of University-affiliated populations. Therefore, campus growth would affect the County’s economy.

The following discussion offers an explanation of how the growth proposed in the 2010 LRDP might affect the regional economy; information is largely derived from an economic report completed by Bill Watkins in March, 2008 (The Economic Forecast Project, UCSB).14

The 2010 LRDP would result in indirect growth in the employment sector (that is, growth in jobs not directly attributable to University employment). This growth occurs because jobs directly created by the University increase demand for services (retail and professional) and goods, which results in additional (indirect) job creation.15 To get an idea of how many jobs are created in this manner, according to the Watkins report each additional job at the University generates, on average, slightly more than one other job in Santa Barbara County.16 Thus, the 1,700 additional faculty and staff jobs projected for 2025 would end up generating at least 1,700 other jobs within the County.

Jobs are also generated based on the amount of money the University spends in the County. These expenditures (for both capital projects and ongoing operational costs), create jobs in construction, government, and the service industry.17 On average, the University helped create about 33 jobs in the County for every one million dollars in expenditures in 2002-2003.18 University expenditures have consistently increased since the period reported on by the

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14 The study defines direct, indirect, and induced growth effects in primarily economic terms, and does not equate to the same terms as defined under CEQA, which apply to physical effects on the environment. The study defines the terms as follows:

*Direct Effects* – The effects of direct spending by an establishment, such as payroll expenditures and purchases of goods and services. In this case, direct employment impacts of the University include faculty and staff.

*Indirect Effects* – As an establishment undertakes activity, it purchases goods from local businesses, which in turn, because of this new demand are able to employ workers and expend revenues on wages and salaries. Thus, there are indirect effects of the first round of expenditures on jobs and additional local spending. In this case, these are jobs created by other establishments because of University spending.

*Induced Effects* – While direct and indirect effects measure the impacts of business to business interactions, induced effects are specific to the behavior of the employees of the businesses. Induced effects are a measure of the effects generated as employees of the initial establishment and related businesses spend their earnings in the local economy on food, transportation, housing, medical, and so on. These jobs are more dispersed, and are less connected to the University than they are to regional trends and pressures. This is often referred to as a ‘ripple’ effect.

16 Ibid, p. 51.
17 Ibid.
18 Ibid.
Watkins report. Because expenditures will likely continue to increase—particularly through implementation of the 2010 LRDP—the University would generate an increasing number of jobs in this manner as time goes on.

Student expenditures also have a substantial employment impact. In fact, the Watkins report stated that 11 jobs are created for every one million dollars spent by students in the county. Money spent by UC-affiliated visitors is also significant. For each million dollars visitors spend, about 26 jobs on average are created in the county. Because the student population is projected to increase, and subsequently the visitor population, implementation of the 2010 LRDP would contribute to an increase in job opportunities in areas serving these sectors. The report projects that a student population of 25,000 would induce a 29.5% increase in visitor spending.

To summarize thus far: additional indirect jobs are generated from four components of campus growth: 1) the increased demand in services and goods from new University employees; 2) the money spent by the University on capital projects and required goods and services for campus operations; 3) the money spent by students in the community; and 4) the money spent by campus visitors. These four factors add up to generate an indirect, but very significant, increase in jobs in Santa Barbara County, year by year as the LRDP builds out. To capture this impact, the Watkins analysis stated that the University would have created in total 11,071 indirect jobs (2,200 from future enrollment growth) at a future enrollment of 25,000 students, as proposed in the 2010 LRDP. This total figure includes the indirect jobs created by the existing enrollment of 20,000 students.

Other Impacts from Indirect Job Generation. As stated in the report, the South Coast area is considered job-rich compared to the availability of housing. While the LRDP proposes housing for all new employees and new students—thereby lessening direct impacts to the regional jobs-housing imbalance—the indirect job growth anticipated could exacerbate the imbalance of jobs and housing in the immediate area. This is because the University would be encouraging regional job creation but not providing housing for the indirectly-induced non-University-affiliated work force. These indirectly-generated jobs (2,200, as mentioned above) are most likely to be in the “retail trade,” “other services,” and “leisure/hospitality services” categories of employment, jobs which typically provide a lower wage.

The environmental effects of a proposed project’s induced growth are secondary or indirect impacts. Induced growth can result in increased demand on community and public service infrastructure, an increase in traffic, noise, degradation of air and water quality, and agricultural land conversion to urbanized uses. In addition, market forces set in motion by one project approval can create pressure to change general plan and zoning designations on other lands in the future. Specifically, the potential environmental impacts of creating more jobs than housing are two-fold: 1) increased pressure on surrounding housing markets (as discussed in above), and 2) impacts related to workers commuting from areas outside the South Coast (impacts related to air quality and road infrastructure associated with travel). A relatively small, but significant, number of University employees commute from San Luis

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21 Ibid, p. 59.
Obispo County and Ventura County. In addition, due to housing pressures in Goleta, a higher percentage of employees live in Santa Barbara than in neighborhoods closer to campus. These commuters would contribute to impacts on air quality and traffic, impacts that are discussed in DEIR Section 4.2 and RDEIR Section 4.13, respectively.

**Retirement.** A large number of UC Santa Barbara employees will retire during the LRDP’s planning horizon. According to a survey conducted in 2003, 72% of respondents (UCSB faculty and staff) were in the “baby boomer” age group (defined at the time of the survey as between the ages of 39 and 57). In 2025 that age range will be 61 and 79. However, it cannot be stated with certainty how many retiring faculty and staff will stay at their existing residences, and thus indirectly increase the housing supply pressure for their replacements. Santa Barbara is an attractive area for retirement given the weather and recreation opportunities.

Some portion of replacement faculty and especially staff can be anticipated to come from nearby communities, and will not require additional housing because they will commute to work. Also, occupants of University employee residences could be either new employees or replacement employees taking the place of those who have left.

Because of the uncertainties created by individual decisions, the timing and intensity of the effect on the housing market cannot be predicted with certainty. However, it is a certainty that several thousand employees of the University will be replaced during the life of the LRDP. Some of the replaced employees will move away, but many will stay in their homes. This will remain an important consideration in understanding the dynamics of the local housing market and the University’s effect on it. Because of the time necessary to develop new housing in the area, replacement employees will tend to reside farther from campus. More employees will seek housing in the faster growing areas of Ventura, Lompoc and farther north in Santa Maria.

**Temporary Housing/Population Imbalances.** As discussed in the analysis of Impact POP-3, RDEIR Section 4.10, in any given year growth on campus could outpace the availability of housing, or temporary housing shortages could arise following demolition of existing units slated for redevelopment. In the long-term, the University will house all new growth on campus, including student and employee families.

The Santa Barbara Region Economic Community Project (ECP), has studied the region for over a decade, and suggests policies designed to mitigate sprawl and other impacts of unmanaged growth. ECP’s reports acknowledge the high cost of housing and the disparity between housing cost and affordability to middle and lower income population groups. The ECP states that the Santa Barbara coast is not affordable to middle and lower incomes, which requires service workers and other employees to seek housing outside of the region. This results in longer commutes from outlying areas, with a resulting degradation of traffic conditions and air quality. The provision of faculty and staff housing by the University in the

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23 According to their website www.sbecp.org “The Santa Barbara Region Economic Community Project (ECP) is a decade-old, non-profit coalition of business, government, academia, and community leaders, promoting a sustainable economy and a high quality of life.”
2010 LRDP will increase the ability of middle-income earning individuals and families to live on the Santa Barbara coast, improving the aforementioned cost-affordability disparity.

**Regional Growth.** As presented in Section 4.10.1.1 of the RDEIR, communities in the study area are projected to grow in terms of both housing and population. The SBCAG 2005-2040 Regional Growth Forecast predicts the County’s residential land use availability in 2040 will be 6,335 units, with most of the land available for residential use located in the unincorporated areas. In making this conclusion about the amount of housing available in the County in 2020, the Regional Growth Forecast did not count pending but unapproved housing projects as of August, 2007. This uncounted housing includes the approximately 1,400 new housing units proposed in the Draft Isla Vista Master Plan. Also, the City of Lompoc has two large housing proposals (970 potential acres of development) which are not accounted for in the Regional Growth Forecast. The Regional Growth Forecast likewise does not include new housing on the UC Santa Barbara campus.

Regional growth will occur in a relatively constrained land use and development environment, subject to physical, regulatory, and market constraints. This translates into relatively slow growth projections for each of the study area communities. Although the 2010 LRDP has a goal of housing all new growth on campus, periods may exist during which new housing and new population are not in balance. Indirect employment increases may also increase pressure on local housing markets.

While it is difficult to demonstrate quantitatively whether or how the regional housing supply would fall short when projected growth in area communities is combined with indirect employment impacts of the University, given ongoing concerns with housing affordability, and particularly the lack of housing affordable to low and moderate income households, high land and construction costs, and other limiting factors stated previously, it is assumed that provision of adequate and affordable housing in the region will continue to fall short of demand. Regional forecast models attempt to account for these background factors to the extent feasible, by assuming changes in job migration patterns (a shift of workers from areas nearby to more outlying, less expensive communities such as Lompoc), an aging population who may remain in the area (presenting competition for workers in terms of housing), and the other factors discussed previously.

### 2.5 Master Response - Phelps/Mesa Connection

This master response addresses comments regarding the proposal to open Phelps Road/Mesa Road between Storke Avenue and Los Carneros.

**Background**

The proposed 2008 LRDP takes account of and incorporates relevant, planned improvements from other jurisdictions. One of these planned improvements is the Phelps Road/Mesa Road

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24 Buildout consists of new units on currently vacant land that has residential development potential, and reuse or redevelopment of existing land at higher densities. Growth forecasts do not include proposed 2010 LRDP growth.
connection. Comments on the DEIR and the RDEIR refer to the desirability of the proposed connection, its safety, and its relationship to vehicular circulation and traffic.

The proposed connection is currently part of the City of Goleta 2006 General Plan (see Figure 7-3 of that document), and was reviewed in the General Plan EIR (see Section 3.13 of that document, as well as Figure 3.13-6). The connection is included in the City of Goleta’s current General Plan (see Figure 7-3) as a roadway link, and was analyzed in the EIR for the City’s General Plan (SCH No. 2005031151; certified by City Council Resolution No. 06-37). The following excerpt is from the City of Goleta General Plan Transportation Element (p. 7-20):

TE 5.7 Connection of Phelps Road. (GP/LUP) This planned project will provide a connection between the present easterly terminus of Phelps Road and Los Carneros Road to the east, aligning with the intersection of Mesa Road and Los Carneros. The purpose of this project is to improve LOS on Hollister Avenue, Storke Road, Los Carneros Road, and El Colegio by enabling traffic between Western Goleta and UCSB to utilize a direct alternative route to these roads. This project will also assist with reducing future congestion at the Storke-Hollister intersection.

Accordingly, the University took this connection into account when planning for buildout of the 2010 LRDP. The University acknowledges the planned connection in the LRDP and EIR, as it does with other relevant improvements in nearby jurisdictions.

For the project to proceed, both the City and University would have to approve the connection, because one side of the connection would be on City property, and the other on University property. With regard to timing of the connection, the City of Goleta stated in its comments on the 2010 LRDP DEIR that the City has no present intention to open the connection.

Purpose of the Connection

The recirculated Transportation Section (p. 4.13-104) of the LRDP EIR provides an analysis of the connection. The connection would reduce traffic impacts on nearby intersections and roadways (see Impacts TRAFFIC-2, 4, 5, and 6), while also potentially causing related impacts. The following is excerpted from the recirculated Transportation Section (4.13-104).

The increase in traffic volumes along Phelps Road and Mesa Road with the proposed connection would require intersection improvements at the Phelps Road/Storke Road and Mesa Road/Los Carneros Road intersections as summarized below.

- Phelps Road/Storke Road – With the construction of the proposed Phelps/Mesa connection, the Phelps Road/Storke Road intersection would operate unacceptably at LOS D during the p.m. peak hour under 2025 conditions due to the increase in traffic volumes on Phelps Road. The following improvement is recommended.
  - Widen the westbound Phelps Road approach to the intersection to contain a left, through, and right-turn lane.
This improvement would provide LOS B operations during the p.m. peak hour under Year 2025 plus LRDP conditions with the proposed Phelps/Mesa connection.

- Mesa Road/Los Carneros Road – With the proposed LRDP growth and the construction of the Phelps/Mesa connection, the Mesa Road/Los Carneros Road intersection would operate unacceptably at LOS F during the p.m. peak hour under 2025 conditions. The following improvement is recommended.
  - Widen the eastbound and westbound approaches on Los Carneros Road to contain a left-turn, through, and right-turn lane and widen Los Carneros Road to provide two northbound and two southbound travel lanes through the intersection.

This improvement would provide LOS C operations during the p.m. peak hour under Year 2025 plus LRDP conditions with the Phelps/Mesa roadway connection.

With the intersection improvements identified above, Phelps Road and Mesa Road would operate at or above the City’s LOS C policy for peak hour operations and could accommodate the increase in traffic resulting from the Phelps/Mesa connection.

As demonstrated in the 2010 LRDP DEIR and RDEIR, and the City of Goleta’s 2006 General Plan, the Phelps/Mesa connection would improve traffic operations along El Colegio Road and Hollister Road, including the Storke Road/Hollister Road intersection (see Impacts TRAFFIC-2, 4, 5, and 6 of the recirculated Transportation Section). As stated in Section 7.0 of the Goleta General Plan,

This planned project will provide a connection between the present eastern terminus of Phelps Road and Los Carneros Road to the east, aligning with the intersection of Mesa Road and Los Carneros Road. The purpose of this project is to improve LOS on Hollister Avenue, Storke Road, Los Carneros Road, and El Colegio Road by enabling traffic between western Goleta and UCSB to utilize a direct alternative route to these roads. This project will also assist with reducing future congestion at the Storke Road/Hollister Avenue intersection (p. 7-20).

The Phelps/Mesa connection also would increase the daily traffic volumes along Phelps Road to approximately 7,700 vehicles (an increase of approximately 5,600 vehicles per day). The City of Goleta LOS C threshold for minor arterial roadways is 9,300 vehicles per day with a design capacity of 11,600 vehicles per day. Under 2025 conditions, even with the Phelps/Mesa connection, Phelps Road would operate at an acceptable LOS; i.e., below the City’s LOS C threshold with a volume-to-capacity ratio of 0.66 (where a value of 1.0 would indicate a maximum volume-to-capacity ratio).

**Traffic Safety**

Some commenters expressed concerns about pedestrian safety related to the Phelps/Mesa roadway connection. It is assumed that the roadway would be designed and constructed to normal traffic safety and road design specifications. The existing curbs, driveway spacing, intersection design, drainage, lane widths, sidewalks, and lighting were designed and built in anticipation of the proposed, future road widening, and similar or equivalent design characteristics would be used on the University portion of the roadway extension. Vehicles on Phelps Road would be subject to typical residential speed limits required within the City of
Goleta and the campus. There is no evidence of an unusual number or type of accidents related to this particular roadway or equivalent roadway design.

The fact that children play on properties adjacent to Phelps Road does not present an abnormal condition that would make the proposed roadway less safe than other roads of similar character with similar land uses nearby. The fact that there is housing on both sides of the street likewise does not create an unusual situation such that it would be out of character with other residential neighborhoods; housing can be found on both sides of streets in most communities. The existing wall between the backyards of the residences and the roadway system lessens the likelihood of children being harmed by traffic. Similarly, existing fences, walls, and gates between the childcare center and the roadway limit the likelihood of children wandering out of the control of supervising adults. The lack of on-street parking reduces the “darting children” hazard as well. This stretch of Phelps Road is notable also for having only one T-intersection and two driveways along its 1,400-foot length, rather than the more conventional spacing of driveways and 4-way intersections associated with suburban residential development patterns.
The above photographs show that the existing Phelps Road does not present any abnormal conditions, such as a short line of sight or topographical variation, that would make this residential street an unusual safety hazard when connected with another residential street. The traffic count would increase—as is discussed in recirculated Section 4.13 of the DEIR—and the related impacts are addressed therein. Mitigation measures for significant noise and air quality impacts are discussed in DEIR Section 4.9 (Impact NOISE-3, p. 4.9-26) and RDEIR Section 4.2 (Impact AIR-1, p. 4.2-21), respectively, although overall impacts from buildout of the LRDP to air quality would be significant and unavoidable. Mitigation for impacts related to increases in traffic volume on City of Goleta roadways is discussed in recirculated Section 4.13 (Impact TRAFFIC-4, p. 4.13-113).

Some commenters have expressed concerns about the hazard to children when they are playing in the street, near or at the cul-de-sac. In general, roadways are not a recommended or safe place for children to play. Further, as the RDEIR shows, future traffic on Phelps Road would increase (see Impact TRAFFIC-4 of recirculated Section 4.13).

Another concern raised was the widening of Phelps Road and encroachment on adjacent uses. As stated in RDEIR Transportation Section (p. 4.13-105), a required improvement to Phelps Road would be to “widen the westbound Phelps Road approach to the intersection to contain a left, through, and right-turn lane.” Such an improvement would not entail widening along the length of Phelps Road.

Some commenters have stated that the connection would “sever” a common bicycle route. That is incorrect. The connection would simply connect Phelps Road with Mesa Road at the point of the existing co-terminus. Bicycles would be accommodated as they are now. Both Mesa Road and Access Road are shared routes for automobiles and bicycles in their existing conditions (see RDEIR Figure 4.13-4a), and will continue to be so in the future regardless of whether the connection is implemented.

Traffic Noise

The City of Goleta’s General Plan EIR included Phelps Road (east of Storke Road) in its noise modeling analysis (Figure 3.11-1). Noise monitoring took place at the day care facility (Isla Vista Children’s Center) on Phelps Road, as shown in Figure 3.11-1 and in Table 3.11-4 of the DEIR Noise Section.

Goleta’s General Plan EIR analyzed the impacts of traffic noise on noise-sensitive receptors (residential areas, schools, daycare, etc.), and concluded that impacts to areas surrounding certain roadway segments would be significant and unavoidable (pp. 3.11-17, 18):

Impact 3.11-2. With adoption of the GP/CLUP, traffic volumes on some streets would increase relative to volumes that would occur under the No Action Alternative. Adoption of the GP/CLUP is not anticipated to increase aircraft, train, commercial, or industrial operations in the City. Figure 3.11-3 indicates the predicted traffic noise contours in 2030. Table 3.11-1 summarizes predicted traffic noise levels in the City under existing conditions and 2030 conditions under the No Project Alternative and the GP/CLUP. The comparison between the 2030 GP/CLUP conditions and the 2030 No Action condition indicates the direct effect that adoption of the GP/CLUP would have on traffic noise. There are a number of roadways where traffic noise on adjacent parcels is predicted to
increase under the GP/CLUP to a level that exceeds 65 dBA CNEL. This includes the following roadway segments:

- Cathedral Oaks Road east of Patterson Avenue
- Cathedral Oaks Road east of Ribera Avenue
- Fairview Avenue north of Hollister Avenue
- Hollister Avenue west of Pacific Oaks Drive
- Hollister Avenue west of Storke Drive
- Hollister Avenue west of Los Carneros Road
- Hollister Avenue west of Cremona Drive
- Hollister Avenue west of Los Carneros Way
- Hollister Avenue west of La Patera Lane
- Hollister Avenue west of Dearborn Place
- Hollister Avenue west of Lasson Drive
- Storke Road north of Marketplace Drive
- Storke Road north of Phelps Road

Assuming nominal exterior-to-interior noise reduction of 20 dB, interior noise levels could also increase to exceed 45 dBA CNEL. This impact is therefore considered to be significant.

Policies That Would Reduce Impact 3.11-2, but Not to a Level of Insignificance. Implementation of the following GP/CLUP policies will help to limit increases in traffic noise along existing roadways. Synchronization of lights will improve traffic flow and reduce the number of vehicle stops and starts along roadway segments. Use of alternative paving materials will reduce tire noise. Programs to promote public transit and high-occupancy vehicles will reduce traffic volumes and thus traffic noise. Implementation of these policies is therefore expected to reduce increases in traffic noise that will result from implementation of the GP/CLUP to a less-than-significant level for many situations. It is, however, likely that projected increases in noise will remain in some cases that will preclude reducing noise increases to a less-than-significant level. This impact is therefore considered to be significant and unavoidable.

As shown above, Phelps Road is not one of the roadway segments that would be affected by unavoidable noise impacts. As shown in Table 3.11-1 of the City of Goleta's General Plan EIR, the existing noise level (2005) was 52 dBA CNEL, while implementation of the General Plan at 2030 (with the Phelps/Mesa connection that was proposed therein) would raise noise levels to 57 CNEL. Again, these measures were taken at the Isla Vista Children's Center.

In addition, site specific noise analysis was prepared for the Storke Ranch Housing Project EIR, which also considered increased traffic associated with the connection of Storke and Mesa Roads. The conclusion of the EIR was that the impacts would not be significant if mitigated. Many roadway design elements—the building setbacks, window placement and treatment, and especially backyard walls that exist today, were mitigations to reduce noise impacts.

25 Community Noise Equivalent Level—a weighted average of sound levels gathered throughout the 24-hour period.
The City of Goleta EIR also accounted for cumulative noise impacts including noise from the City of Santa Barbara Airport. Such impacts were considered to be Class I impacts, significant and unavoidable. The Goleta General Plan includes policies (NE 2, NE 7) to help mitigate impacts. The University’s contribution to this impact, however, is not considered to be significant with Mitigation Measure NOISE-3A.

**Air Quality**

As indicated by Impact AIR-1 and Impact AIR-5 of the recirculated Air Quality Section (4.2), impacts from campus growth—and those in conjunction with other growth in the region—would be significant and unavoidable. A new Health Risk Assessment (HRA) was performed for the RDEIR (Appendix 4.2-3), and, as discussed in Impact AIR-2, impacts were determined to be less than significant. The Phelps/Mesa connection was included as a segment of the “traffic line sources” modeled in the HRA. As noted on page 10 of the HRA, operation phase cancer, chronic, and acute risk is less than significant.

As is also discussed in the RDEIR (see also HRA, p. 10), emissions from construction, including construction of the Phelps/Mesa connection, would be assessed on a project-by-project basis to determine significance for diesel and other particulate matter emissions. At the time that a specific LRDP project is proposed and environmental review is begun, additional studies will be conducted based on project-specific information about the precise sources of emissions that are not known and cannot be known at this time. In this case, with the Phelps/Mesa connection, studies will be undertaken with both the City of Goleta and the University cooperation, since the connection would involve the approval of both jurisdictions.

**Environmental Justice**

Another comment made regarding the potential connection is that it would constitute a case of environmental injustice because of allegedly disproportionate impacts to the low-income housing development north of Phelps Road. As stated in the 2003 General Plan Guidelines, “environmental justice is defined in state planning law as the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies (§65040.12(e)).

The roadway connection would serve neighborhoods on both sides of the road. On one side of the proposed roadway connection is a middle-upper class subdivision, and a portion of the road would run next to and through a University housing project with a mixture of income, race, and cultural characteristics on the other side. Hence, there is no targeting of a particular disadvantaged socioeconomic group. The potential connection does not unfairly treat groups of certain racial, cultural, or income characteristics, or any other identified group, since such a connection would be proposed based on the nature of the street network and community circulation needs, and not on the socioeconomic characteristics of nearby residential districts. In addition, as explained above, the Phelps/Mesa connection would not pose an unusual danger or other unusual threat uncommon to residential streets, as discussed above.
Emergency Access

A few commenters state that altering the existing emergency access at the Phelps/Mesa terminus would cause potential emergency access delays for fire and police, since there would be an increase in traffic on Phelps and Mesa Roads. Currently, there is an access point which is available for emergency response. Connecting the roads would enhance emergency access between the separated residential areas. The increased traffic on the roadway would be well within the design capacity of Phelps Road, and it is assumed that the connection would be constructed to the same specifications. Any future roadway design would be required to include provisions for access by emergency vehicles including lane widths, shoulder widths, roadbed section, turning radii, and other standard features.

Existing Fire Access Road Agreement

An existing agreement between the City of Goleta and the University establishes the purpose and allowable uses of the existing emergency easement. It is assumed that this agreement would be replaced by another agreement if the Phelps/Mesa connection is improved because, as explained above, the connection would be a joint effort between the University and City.

Bayberry Lane/Phelps Road

Potential wait times may be increased for vehicles exiting Storke Ranch onto Phelps Road from Bayberry Lane. This issue would be analyzed if and when a connection project is proposed as a potential project-level impact.

Traffic Count Issues

Some comments state that the location of the traffic count taken for the LRDP EIR resulted in a lower traffic volume. As stated on RDEIR page 4.13-8, the traffic count on Phelps Road was taken “just east of Storke Road.” Thus, at this location, all vehicles entering Phelps Road east of Storke Road were counted, not just vehicles driving all the way to the end of the road. The count of vehicles entering Phelps Road just east of the intersection was 2,030 vehicles. This number would surely be much lower if the cars counted were entering Phelps Road just to drive to the dead end (for example, 33 vehicles were reported by a nearby resident). The dead-end is visible to drivers, and there are limited reasons to drive to the end.

As stated above, Phelps Road would operate below the City’s LOS C threshold with a volume-to-capacity ratio of 0.66 (where a value of 1.0 would indicate a maximum volume-to-capacity ratio), even with the Phelps/Mesa connection.
This chapter presents all written and oral comments received on the Draft EIR. It is recommended that reviewers use the Index to Comments (Chapter I of this volume) to locate comments from specific agencies, individuals, or organizations.
Comments and Responses on Draft EIR - Agencies
June 24, 2008

Chris Clark
University of California
641 Higuera Street, Suite 301
San Luis Obispo, CA 93401

Subject: UC Santa Barbara Long Range Development Plan
SCH#: 2007051128

Dear Chris Clark:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on June 23, 2008, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency
**Document Details Report**  
**State Clearinghouse Data Base**

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<tr>
<td><strong>Lead Agency</strong></td>
<td>University of California, Santa Barbara</td>
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**Type** EIR  
**Draft EIR**

**Description**  
Long range plan for the physical development of the University through the year 2025. Plans call for 3,304 net new dwelling units and about 1.8 million square feet of instructional/institutional floor space.

### Lead Agency Contact

<table>
<thead>
<tr>
<th><strong>Name</strong></th>
<th>Chris Clark</th>
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<td><strong>Zip</strong></td>
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### Project Location

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<td><strong>Lat / Long</strong></td>
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<td><strong>Cross Streets</strong></td>
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### Proximity to:

- **Highways**: 101  
- **Airports**: Santa Barbara Municipal  
- **Railways**:  
- **Waterways**:  
- **Schools**: Isla Vista Elementary  
- **Land Use**: Public Facilities

### Project Issues

- Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Coastal Zone; Cumulative Effects; Drainage/Absorption; Economics/Jobs; Fiscal Impacts; Flood Plain/Flooding;  
- Geologic/Seismic; Growth Inducing; Landuse; Noise; Population/Housing Balance; Public Services;  
- Recreation/Parks; Schools/Universities; Sewer Capacity; Solid Waste; Toxic/Hazardous;  
- Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife

### Reviewing Agencies

- Resources Agency; Regional Water Quality Control Board, Region 3; Department of Parks and Recreation; Native American Heritage Commission; Department of Housing and Community Development; Department of Fish and Game, Region 5; Department of Water Resources; Department of Conservation; California Coastal Commission; California Highway Patrol; Caltrans, District 5;  
- Caltrans, Division of Aeronautics; Air Resources Board, Transportation Projects; Department of Toxic Substances Control; State Water Resources Control Board, Clean Water Program

**Date Received** 03/19/2008  
**Start of Review** 03/19/2008  
**End of Review** 06/23/2008

**Note:** Blanks in data fields result from insufficient information provided by lead agency.
Letter A-1
Terry Roberts
Director, State Clearing House

June 24, 2008

Response to Comment A-1-1. Receipt of notice is noted for the record.
June 19, 2008

Alissa Hummer
UCSB Campus Planning and Design
Santa Barbara, CA 93106-1030

RE: Draft EIR for the University of California, Santa Barbara’s Long Range Development Plan Update

Dear Ms. Hummer,

Thank you for providing Commission staff with an opportunity to comment on the Draft EIR (DEIR) for the 2008 update to the University of California, Santa Barbara’s Long Range Development Plan (LRDP). The update involves the revision of the existing certified 1990 LRDP, as amended through 2006, and addresses the University’s development objectives for achieving campus academic goals through 2025.

Section 30605 of the Coastal Act states that in order to promote greater efficiency for the planning of any state university or college and as an alternative to project-by-project review, long-range land use development plans may be submitted to the Commission for review in the same manner prescribed for the review of local coastal programs. This section further states that a certified long-range development plan may be amended by the state university or college, but no amendment shall take effect until it has been certified by the Commission. Therefore, the 2008 LRDP update is subject to review and approval by the Commission prior to implementation.

The updated 2008 LRDP would serve as the master planning document for development on the UCSB campus and includes policies on land use and development, transportation and parking, open space and landscape, public access, recreation, sensitive coastal resources, and utilities and infrastructure. The plan outlines development necessary to accommodate a gradual increase in enrollment at an average rate of 1% per year, from the current enrollment of 20,000 to a total of 25,000 students by 2025. It also outlines development necessary to accommodate an additional 336 faculty and an additional 1,400 staff. The development proposed in the 2008 LRDP includes an additional 1.8 million assignable square feet (2.5 million gross square feet) for instruction, research, and support space, 5,443 additional student bed spaces, 239 additional student family units, 1,874 additional faculty and staff housing units, 5 additional acres of recreational fields, and construction of 3,650 new parking spaces.

The following comments outline our preliminary concerns with regard to Coastal Act consistency as a result of our review of the 2008 LRDP and associated DEIR. The comments are organized by resource topics and in some cases, indicate additional information requirements necessary to facilitate the future LRDP Amendment process.

1. **Comparison of Current and Proposed LRDP Policies.** In order for staff to fully understand the scope of the 2008 LRDP during the LRDPA review, it will be
necessary for UCSB to provide a comparison of the existing policies in the current certified LRDP (1990 LRDP, as amended in 2006 for the North and West Campus Housing Project, LRDPA 1-06) and the proposed new policies in the 2008 LRDP. The comparison of current and proposed policies should include an explanation for any additions, deletions, or revisions to the current policies. A preliminary comparative review of the current and proposed policies indicates that many of the policies that were certified in the 2006 LRDPA for North and West Campus Housing have been eliminated in the 2008 LRDP. Deletion of these policies is of concern to staff as many of them addressed measures designed to minimize impacts to environmentally sensitive habitat areas (ESHA) and other sensitive coastal resources. It is likely that our staff recommendation to the Commission will require UCSB to retain some, or all, of these deleted policies in the 2008 LRDP.

The comparative policy analysis should also include an explanation of how the policies contained in the Management Plan for the Campus Lagoon would be integrated into the 2008 LRDP.

2. **Resource Surveys.** In order to assess the potential impacts to coastal resources due to siting of new development, it is necessary to have recent (generally within 1 year) biological, cultural, and geologic surveys for each proposed development envelope. Necessary biological information for each site would include, but not be limited to: assessment and location of vegetation types, presence and use by raptors, presence and use by nesting birds, presence and use by monarch butterflies, location of any wetlands or streams, and location and types of trees.

3. **Environmentally Sensitive Habitat Areas (ESHA).** Section 30240 of the Coastal Act states that environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values and that development in areas adjacent to environmentally sensitive habitat areas shall be sited and designed to prevent impacts which would significantly degrade those areas. In order to minimize impacts to ESHA associated with development proposed in the 2008 LRDP, the LRDP should include policies that specify the required minimum setbacks and buffers between ESHA and development. Furthermore, the DEIR and the 2008 LRDP should include policies that clearly define the appropriate mitigation ratio for impacts to sensitive resources including, but not limited to, wetland, riparian, Southern tarplant, monarch butterfly, native grassland, open water, and stream habitats, as well as impacts to oak trees and other native and non-native trees that serve as habitat for roosting or breeding birds.

Additionally, the DEIR and the 2008 LRDP should include a policy that requires updated biological surveys for each new development site prior to designing new development in order to work around any applicable biological resource constraints.

Further, the 2008 LRDP should include a policy that requires biological surveys for nesting birds to be conducted prior to construction of any development on campus and specifies appropriate construction timing to minimize impacts to avian species during breeding season. The DEIR and 2008 LRDP should also include all of policies that were included in certified LRDPA 1-06 that address the protection of the snowy plover population on Sands Beach as well as all other polices that relate
to protection or mitigation of ESHA on campus. Furthermore, the 2008 LRDP should include a policy regarding tree-trimming throughout campus. Commission staff is happy to work with the University to develop this policy during the LRDPA process.

The 2008 LRDP proposes to create a meditative labyrinth on Lagoon Island. Given that Lagoon Island has been designated as an ESHA in the Campus Lagoon Management Plan and such development is not a resource-dependent use, it would not be consistent with Section 30240 of the Coastal Act and therefore we recommend that the University delete all references to this proposal from the 2008 LRDP.

Figure B.13 of the 2008 LRDP depicts the locations of ESHA on campus. However, this figure does not depict the extent of raptor or other birds of prey nests located around the north and west sides of Harder Stadium and surrounding the edges of Storke Wetland, as reported by Mark Holmgren, Associate Director of the Center for Biodiversity and Ecosystem Restoration. Mr. Holmgren provided a report and letter describing the birds of prey utilizing the East Storke Campus for the analysis of the Storke North Field Project (LRDPA 2-05) and for the East Storke Campus Wetland Enhancement Project (NOID 3-07). The information provided by Mr. Holmgren indicated that the area between Harder Stadium and the CCBER Greenhouse is known to support regular nesting by red-tailed hawks, red-shouldered hawks, Cooper’s hawks, white-tailed kites, American kestrels, and great horned owls. The ESHA figure in the 2008 LRDP should be revised to depict the locations of nests of all sensitive bird species on campus.

Policy SCEN-5 of the 2008 LRDP states that “Trees with significant scenic or biological value shall be retained or relocated to the extent feasible, or replaced at a ratio of 3:1.” First, this policy should be bifurcated into two policies, one to address trees the are of scenic value, and another to address trees of biological value to ensure that appropriate tree policies are not overlooked for the intended application. Additionally, the modified policies should specifically state that oak trees shall not be removed except under unusual circumstances such as if the oak tree is dead, poses a danger to healthy trees, or is an imminent danger to persons or property. Further, the policies should include a mitigation ratio requiring 10 oak trees to planted for every one oak tree impacted where oak tree removal cannot be avoided. In general, the language for trees other than oaks in this policy should be strengthened to first require avoidance, and if avoidance is determined to be infeasible, relocation and/or mitigation.

Policy ESH-27 states that improvements identified in the University’s portion of the Ellwood Open Space and Habitat Management Plan shall be implemented in phases. Please explain how this plan would be incorporated into the 2008 LRDP. If the plan is to be incorporated as part of the certified 2008 LRDP document, policy ESH-27 should include implementing measures specifying how and when these improvements would occur.

While the DEIR and 2008 LRDP address diking and filling in policies FIL-1 through FIL-3, these policies apply only to Devereux Slough, Storke Campus Wetlands,
Campus Lagoon, or any other natural watercourse or constructed channels on campus. The DEIR and 2008 LRDP should include a policy that addresses the placement of fill in *all* ESHA on campus.

Finally, the 2008 LRDP should include a policy that includes provisions to allow for the designation of ESHA in the future, regardless of whether its specifically mapped as ESHA in the LRDP, based on specific criteria and current on-the-ground conditions. Areas should be designated as ESHA if they meet the following criteria: (1) any habitat areas that are rare or especially valuable from a local, regional, or statewide basis; (2) areas that contribute to the viability of plant or animal species designated as rare, threatened, or endangered under State of Federal law; (3) areas that contribute to the viability of a species designated as fully protected of species of special concern under State law or regulation; and (4) areas that contribute to the viability of plant species for which there is compelling evidence of rarity.

4. **Public Access.** Sections 30210, 30211, and 30212 of the Coastal Act require that new development not interfere with the public’s right of access to the coast and that public access be provided as part of new development projects. Figure E.3 of the LRDP illustrates the current and proposed coastal access for the UCSB campus. Based on this figure, it appears that the public access proposed as part of the 2008 LRDP would include two boardwalks, one restroom, two beach staircases, and improved trails and bike paths. Page E.9 of the 2008 LRDP also indicates that an additional 20 dedicated coastal access parking spaces would be provided at the Devereux site as part of that area’s redevelopment. Figure E.3 should be revised to depict all current and proposed coastal access parking areas within all areas of campus. Furthermore, this figure should be revised to clearly depict the current and proposed trails and bike paths and levels of improvements on these trails and paths (e.g. paving, widening) so that staff can analyze the scope of the public access components that are being proposed.

The coastal access portion of the LRDP should include a signage program, including a figure that depicts the proposed locations of way-finding signage that would direct the public to the coastal access points and parking areas throughout campus.

In order to understand the impacts to public access and for future processing as an LRDP Amendment, we will need a specific coastal parking analysis. The 2008 LRDP indicates that 136 spaces are specifically reserved for public coastal parking. To achieve a full understanding of the parking situation, both existing and proposed, we recommend a graphic showing ALL existing public parking spaces, including the total number in each parking lot available to each user type (public, staff, facilities management, emergency vehicles, etc) and any timing restrictions (hourly, daily, seasonally, meters only, etc). This graphic should include the number and availability of parking spaces at the existing housing areas. The details associated with coastal access parking spaces specifically required under previous NOIDs would need to be called out separately. A second graphic with same design should be created for the final proposed development under the 2008 LRDP update. Parking survey data should be provided to evaluate parking demand for campus
parking lots and campus housing areas. Additionally, parking rates and any other parking management strategies should be identified in order to evaluate the patterns of existing parking demands. Finally, the University should provide an explanation of the phasing for the additional proposed parking.

Figure E.2 of the LRDP depicts the proposed bicycle and trail routes. Please explain why there are no direct bike path connections from the North and West Campus housing sites to the beach. These trail connections are important to maintain the network of public access to and along the coastline.

Finally, given the level of increased development on campus, it is likely that the Commission will require more public access than what is currently proposed as part of the 2008 LRDP. The University should evaluate additional opportunities for coastal access on campus including, but not limited to, additional dedicated coastal access parking distributed throughout the coastal areas of campus and a comprehensive public access signage program leading the public from the interior portions of campus to the beach.

5. Land Use and Development. The proposed land use policies on page D.16 of the LRDP include policy LU-1, which describes the total assignable square footage that would be allowed for academic and support uses on Main Campus. This policy should be revised to include the allowable square footage for these uses on the Devereux campus, if any. Additionally, for the purposes of evaluating potential impacts of development on coastal resources, the maximum gross square footage is a more accurate measure. Therefore, the 2008 LRDP should include a definition of assignable square feet and gross square feet and use of these area calculations for comparison purposes should be consistent throughout the document.

Page H.2 of the 2008 LRDP indicates that the land use of the existing parking lot (Lot 30) on Main Campus would change from “Recreation” to “Academic Uses.” Please indicate the size of this parking lot and whether the loss of this recreational land use area would be offset within another portion of campus.

Development of housing on the Facilities Management site includes the construction of four, 70-foot-tall buildings and one, 50-foot-tall building directly adjacent to Goleta Slough in a location that the current LRDP designates a maximum building height of 35 feet. The DEIR should evaluate the impact of this highly dense, highly visible development on the wildlife and habitat of Goleta Slough. Additionally, the DEIR and the 2008 LRDP should indicate where the Facilities Management buildings would be relocated, if at all.

The DEIR and the 2008 LRDP should include a policy that requires landscaping with native vegetation for all projects on campus with the exception of lawn areas and development on Main Campus that is not adjacent to natural areas or ESHA. This policy should further state that landscaping with non-native invasive plant species on Main Campus is prohibited.

Please explain the type of academic and support facilities that would be developed on Devereux campus.
6. **Shoreline Protection.** The DEIR and updated LRDP contain three new policies regarding shoreline protection on campus. Policy SH-3 allows for the repair and maintenance of existing coastal protection structures to protect Campus Lagoon and the scenic shoreline bluffs. Please explain what existing structures this policy is referring to. Additionally, new development should be located and designed in a manner to avoid the need for shoreline protection devices. The installation of shoreline protection devices to protect Campus Lagoon would not be consistent with the current certified Campus Lagoon Management Plan.

7. **Recreation.** Page D.15 of the 2008 LRDP states that improvements to recreational areas on campus include the reconfiguration, replacement, and addition to existing facilities. It further states that a 5.6-acre site on West Campus next to the Isla Vista Elementary School would be developed for additional playfields. All proposed recreational improvements should be clearly illustrated on a figure within the LRDP. Figure C.1 of the 2008 LRDP does not clearly depict these features. Section 4.12 of the DEIR concludes that while mitigation measures are being proposed to address the University’s impacts related to the loss of recreational facilities on a project-specific and cumulative level, the limitations of the University’s jurisdiction prevent UCSB from ensuring that sufficient park acreage is designated to offset the intensification of use of on and off-campus recreational facilities resulting from the development proposed in the 2008 LRDP. The DEIR further states that the impacts to recreation as a result of the 2008 LRDP are significant and unavoidable. Section 30213 of the Coastal Act requires that lower cost visitor and recreational facilities be protected, encouraged and provided and Section 30252 requires that the recreational needs of new residents not overload nearby coastal recreation areas. Based on these policies, it appears that the 2008 LRDP is inconsistent with portions of the Coastal Act. In order to resolve these inconsistencies, the University should evaluate additional opportunities to offset the impact of the proposed development on recreational facilities both on and off-campus.

8. **Geology.** Policy ESH-20(a) in the 2008 LRDP requires that new structures constructed as part of the Coal Oil Point Project be set back a minimum of 50 feet from the bluff edge and Policy GEO-6 in the 2008 LRDP states that new development located less than 50 feet from the bluff top shall be constructed to ensure that drainage does not contribute to bluff erosion and slope instability. Commission staff are aware that these two policies have been carried over from Policy 30240(b)(6) and Policy 30253.6 of the current LRDP; however, we believe that it may be necessary to update these policies to require a larger setback for bluff development on UCSB property. Given the highly erosive geologic condition of the bluffs on campus and the increased potential for erosion due to sea level rise, the DEIR should evaluate the annual bluff erosion rate and confirm that the set backs required in these two policies would be adequate to protect development from bluff erosion for a minimum of 100 years. Should the erosion rate be such that development within 50 feet of the bluff edge would be threatened during the next 100 years, these two policies should be revised to establish a protective minimum set back for all new development adjacent to the bluff edge.
9. **Visual Resources.** Section 30251 of the Coastal Act states that the scenic and visual qualities of coastal areas should be considered and protected as a resource of public importance and that permitted development should be sited and designed to protect views to and along the ocean and scenic coastal areas. On page F.5 of the 2008 LRDP, there is a discussion regarding the current conditions on the East Bluffs, with a reference to the existing chain-link fencing. The design for the existing chain-link fencing was not approved by the Commission and this fencing should be removed and replaced with a fence that is more visually permeable and aesthetically pleasing consistent with the Commission’s decision on NOID 2-05. The 2008 LRDP should include a policy to address this issue. Policy GEO-11 should be revised to indicate that fencing or other barriers installed along the bluff top shall be designed to be visually permeable, compatible with the character of the surrounding area, and should be of a specified height that would ensure safety while still allowing for views. This policy should also specifically prohibit use of chain-link fencing.

Additionally, the certified LRDP includes a policy regarding the use of natural building materials and colors that are compatible with the surrounding landscape whenever practical to minimize the visual impacts of development. This policy appears to have been deleted in the 2008 LRDP and should be included in the updated document.

Policy GEO-3 of the 2008 LRDP (which is identical to Policy 30253.3 of the current LRDP) states that no development shall be permitted on faces of campus bluffs with the exception of beach access stairways and pipelines for instructional or research-oriented use. Given the potential view impacts associated with the placement of any pipelines along the bluff face, this policy should be revised to delete the allowance of pipeline line installation along bluff faces.

Table 4.12-1 on page 4.12-5 of the DEIR references a map with all of the recreational facilities on campus. Staff was unable to locate this map within the DEIR document.

Finally, page 4.12-28 of the DEIR states that implementation of the monitoring program outlined in Mitigation Measure REC-2A would reduce potential impacts to coastal access points and recreational resources. However, Mitigation Measure REC-2A discusses the phasing of construction of recreational facilities and playfields for each increment of new enrollment and does not include any discussion of a monitoring program. Please provide information regarding the proposed monitoring program and how it would serve to mitigate impacts of the development proposed in the 2008 LRDP on recreational resources.

10. **Water Quality.** In Section 4.7 of the DEIR, upgrades to stormwater infrastructure are proposed as a mechanism for mitigating the impacts to water quality associated with the proposed increased development. UCSB should explain when these upgrades would be conducted and whether the work would be phased to ensure that there are no temporal impacts to water quality as a result of increasing development prior to infrastructure upgrades.
The DEIR and 2008 LRDP should include a policy that requires the installation of bioswales to treat stormwater associated with new development, where feasible. Furthermore, the DEIR and 2008 LRDP should include a policy that outlines the circumstances by which bioswales can be relocated or eliminated. This policy should include specific criteria for allowing relocation or elimination of bioswales as these features essentially function as wetland habitat and impacts to this habitat has the potential to be significant. If bioswales are required as mitigation for a development project, removal or elimination of these features would be considered infeasible.

The DEIR and 2008 LRDP should also include a policy that requires the treatment of stormwater prior to discharge into any campus wetland or other sensitive coastal habitat areas.

11. **Water Supply.** Section 30250 of the Coastal Act states that new residential, commercial and industrial development shall be located within, contiguous with, or in close proximity to, existing developed areas that are able to accommodate such development. The DEIR states that development associated with implementation of the 2008 LRDP would generate a water demand that would exceed Goleta Water District’s (GWD) water allotment for the University. Staff has several questions regarding this water supply analysis.

Table 4.14-1 provides a projection of the Goleta Water District’s water sources during normal years. Please provide an explanation of how “normal years” were calculated.

Page 4.14-11 of the DEIR indicates that GWD’s future water supply and demand for normal, critical dry, and multiple dry years was based on the District’s 2005 Urban Water Management Plan (UWMP). The potable-water demands established in the 2005 UWMP were based on the development outlined in the 1990 LRDP and did not contemplate the significant level of increased development that is being proposed in the 2008 LRDP. Therefore, staff it appears that the supply and demand numbers outlined in Tables 4.14-7 thorough 4.14-9 underestimate the water supply and demand that would occur as a result of development associated with the 2008 LRDP. The DEIR should be revised to accurately reflect water supply and demand associated with the proposed new development.

Water demand duty factors are utilized in the DEIR to project future water demand resulting from full implementation of the 2008 LRDP. A water duty factor of 0.152 AFY per dwelling unit was used in the water supply/demand analysis for identified housing areas and was based on measured water use at the El Dorado Apartments, an undergraduate housing facility. Given that approximately 50% of the housing proposed in the LRDP would serve graduate students, staff, faculty and their families, using a water duty factor from an undergraduate apartment complex may not sufficiently estimate the water demand associated with the proposed housing developments. Please provide an updated comparative analysis of the current water duty factors and associated housing types as they relate to the proposed housing types in the 2008 LRDP.
The water supply and demand analysis in the DEIR states that development associated with the 2008 LRDP would exceed the available water supply by 194 AFY in normal rainfall years. What would the water deficit be in dry or drought years? The University is proposing to address this lack of water supply by applying to GWD for additional water allotments; however, the University has no guarantee the GWD will grant additional water rights. Furthermore, the University is also proposing to acquire additional water rights from the State Water Project (SWP) should sufficient water supplies from GWD be unavailable. Given the current limitations for pumping water as a result of impacts to Delta smelt, it is not known whether additional water would be granted to the University from the SWP. We understand that although the University did not coordinate with the GWD prior to the release of the DEIR, such coordination has been initiated. Commission staff looks forward to reviewing GWD’s analysis of the proposed impact of development associated with the 2008 LRDP on water supply.

12. Parking. The 2008 LRDP states that the proposed parking ratios for residential development on campus are as follows: (1) East Campus, one space per four beds in apartments; (2) Facilities Management site, one space per four beds in apartments and 1.5 spaces per family unit; and (3) Storke Campus, 1.5 spaces per unit except for Santa Catalina which would have one space per four beds. How ever, it was not clear how these ratios were calculated? In addition, the 2008 LRDP did not define a parking ratio for the residential developments on Main, West, or Devereux Campuses. Therefore, the 2008 LRDP should be revised to include specific parking ratios for all proposed residential development and the EIR should be revised to include an adequate analysis of how these ratios were derived.

Parking requirements for the San Clemente Housing Project (LRDPA 1-04, NOID 2-04) included one space for each bed. Parking requirements for the North and West Campus Housing Project (LRDPA 1-06, NOID 1-06, CDP 4-06-097) included 1.5 spaces per unit for residents with an additional 0.5 spaces for guests. Parking ratios for the proposed 2008 LRDP should be consistent with recently approved projects on campus. Section 30252 of the Coastal Act states that new development should maintain and enhance public access to the coast by providing adequate parking facilities associated with the development. In order for staff to determine whether the proposed development would provide adequate parking (thereby minimizing impacts to coastal access parking), the University should provide a breakdown of the current and proposed housing developments and their corresponding parking ratios. This information should be provided in a table and should list the name and location of the housing development, the housing type (e.g. dorms, apartments), the target user (e.g. undergraduates, single graduate students, student families, faculty and staff), and the associated parking ratio.

Additionally, it is possible that parking in Isla Vista by UCSB students, staff, and faculty will increase due to the increased development and enrollment associated with the 2008 LRDP. The University must coordinate with Santa Barbara County to establish a long-term management plan to alleviate increased parking pressure in Isla Vista that may result from the proposed increases in student enrollment and faculty.
13. **Circulation and Bus Service.** Section 30211 of the Coastal Act requires that development not interfere with the public’s right of access to the sea. Section 4.13 of the DEIR states that there will be significant, unavoidable impacts associated with traffic as a result of the development proposed as part of the 2008 LRDP. Mitigation measures proposed in the DEIR include a monitoring program to evaluate the traffic conditions on campus and at impacted City and County intersections and roadways. Please explain how the University would remedy traffic conditions that are adversely impacting coastal access if it is determined that they are unacceptable as a result of the 2008 LRDP development?

Figure E.1 depicts the proposed vehicular circulation and parking for the 2008 LRDP. Based on this figure, MTD bus service would not run to the new North and West Campus Housing or to the proposed Devereux Campus housing. Section 30250 of the Coastal Act requires that new development should maintain and enhance public access to the coast by facilitating the provision or extension of transit service and by serving the development with public transportation. As you are aware, LRDPA 1-06 requires that the University, in cooperation with MTD, ensure that regular bus and/or shuttle service be provided between all proposed housing on North and West Campus housing to Main Campus.

Increased traffic as a result of the proposed development could result in cumulative impacts to vehicular access to the coastal areas on and adjacent to campus. In order to minimize the impacts of car traffic and encourage the use of alternative transportation, the 2008 LRDP should be revised to include policies that will ensure that alternative and/or public transportation improvements and enhancements be incorporated into all new housing projects. This may include increased levels of bus or shuttle service, or possibly additional routes.

14. **Isla Vista Master Plan.** The DEIR and 2008 LRDP both reference the Isla Vista Master Plan. Although this plan has been adopted by the Santa Barbara County Board of Supervisors, it has not yet been certified by the Coastal Commission. Therefore, the reference to this plan within the LRDP may be confusing and misleading. Discussion of this plan in general terms is appropriate; however, the proposed land use designation figure for the IVMP should be deleted from the 2008 LRDP.

15. **Main Campus Infrastructure Renewal Project (MCIRP).** There are several references to the MCIRP in the DEIR. These references state that the MCIRP was the subject of a separate environmental review process in 2007 and is not part of the 2008 LRDP update. However, the Commission does not have any record of this project being previously submitted as a proposed amendment to the LRDP, nor has it been certified by the Commission as part of the LRDP. Therefore, the 2008 LRDP should be revised to include the MCIRP and any policies that address the impacts of infrastructure replacement on coastal resources.

16. **Campus Plan Figure.** Figure C.1 depicts the overall campus plan for the 2008 LRDP. This figure is very difficult to read because several of the legend designations are similar in design and color. Specifically, the legends for existing
housing, proposed housing, and proposed academic and support buildings are
difficult to differentiate. Please revise this plan using different colors rather than
identical colors and varying shapes to depict existing and proposed development on
campus. Additionally, this plan should be revised to clearly depict current and
proposed parking, recreational, and open space areas.

17. **LRDP Organization.** Some of the policies in the 2008 LRDP are organized in
locations that may not be intuitive to readers. For example, the coastal access
policies are located within the “Transportation and Parking” section. Staff would like
to work with University on structuring some sections of the final 2008 LRDP.

18. **Development Procedures.** Staff has reviewed the proposed development
procedures included in the 2008 LRDP. These procedures are almost identical to
those procedures approved by the Commission in 2007 for the University of
California, Santa Cruz’s (UCSC) LRDP, with a few minor exceptions. Commission
staff will review these procedures in greater detail once the updated LRDP
application is submitted to our office to ensure that the policies required for UCSC
are applicable and appropriate for application at UCSB. Our staff will continue to
work with the University to revise any applicable procedural requirements.

19. **Documentation for LRDP Amendment.** In general, most figures in the LRDP are
of a scale that makes details difficult to decipher. For the purposes of the LRDP
Amendment process, we will need full-size, scalable maps.

Additionally, in order to adequately evaluate the changes, we will need specific
graphics that depict the existing certified conditions in direct comparison to the
newly proposed conditions (i.e., existing and proposed development on one map).
These graphic depictions are important to emphasize key changes including, but
not limited to, land use designations, ESHA designations, coastal access parking,
circulation for each user type (bicycles, pedestrians, vehicles), trail closures,
building heights, building densities, and building envelopes.

Thank you for giving Commission staff an opportunity to comment on the DEIR and the
proposed 2008 LRDP. We look forward to continuing to work with the University to
develop a long-range plan that addresses the academic needs of UCSB while protecting
coastal resources. If you have any questions, please do not hesitate to contact me at
(805) 585-1800.

Sincerely,

Jenn Feinberg
Coastal Program Analyst
Letter A-2
Jenn Feinberg
Coastal Program Analyst
California Coastal Commission

June 18, 2008

Response to Comment A-2-1. Verbatim comparisons of existing and proposed coastal policies will be provided as part of the submittals to the California Coastal Commission of the LRDP subsequent to Regental action. When a 1990 LRDP coastal policy no longer applies, is redundant with another policy or requirement, or refers to development that has already been approved and constructed, that policy has been deleted and is not a part of the 2010 LRDP.

Response to Comment A-2-2. Biological information for proposed development sites has been provided in Section 4.3, Biology, including: assessment and location of vegetation types, presence and use by raptors, presence and use by nesting birds, presence and use by monarch butterflies, location of any wetlands or streams, and location and types of trees. As explained throughout the EIR, future development projects will be subject to individual, project-specific environmental review. Such review could include further resource surveys or updates, as necessary.

Response to Comment A-2-3. The LRDP locates new development away from sensitive resources, including wetlands, open water, and streams. Specific required setbacks employed by the LRDP are addressed in Impact BIO-1.

LRDP policies protecting ESHA include ESH-1 to ESH-28 on LRDP pp. F.8 and F.9. Some development that may impact ESHA would require permits or approvals from other agencies in addition to the Coastal Commission, such as the Army Corps of Engineers, the Regional Water Quality Control Board, or the California Department of Fish and Game, and these permits or approvals will specify mitigation ratios.

Southern tarplant is specifically addressed in Impact BIO-2, and a mitigation ratio of at least 1:1 is proposed. Mitigation of impacts to native grassland is proposed at a 2:1 ratio (see LRDP Policy ESH-14).

Response to Comment A-2-4. Following a program EIR, such as the LRDP EIR, CEQA requires project-level environmental review of individual development projects. Please see subsections 1.5 and 1.6 of the EIR for further information regarding tiered environmental review. This subsequent review will, pursuant to CEQA, include all necessary updated biological surveys.

Response to Comment A-2-5. Please refer to responses to comment A-2-2 and -4 regarding future surveys. No development is proposed which would adversely affect the snowy plovers on the Coal Oil Point Reserve. Policies for the protection of ESHAs can be found on LRDP pages F.8 and F.9.

Response to Comment A-2-6. Tree trimming policies are proposed in the LRDP in Sections D.2 and F.2.

Response to Comment A-2-7. The labyrinth is proposed to be a passive walkway or recreation feature consistent with the Coastal Act policies protecting coastal recreational opportunities that have no adverse impact on sensitive habitats. The Coastal Commission will need to review and certify relevant components of the LRDP, including the labyrinth.

Response to Comment A-2-8. ESHA and raptor nests are defined and mapped in Figure 4.3-3 of EIR Section 4.3, Biology, and Figure F.7 of the LRDP. Mapping of raptor nests and other biologically sensitive areas was based on numerous surveys performed by biologists from 2006 to 2007 for preparation of the Biology Section, as noted on page 4.3-30 of the EIR. The LRDP and EIR maps are based on the results of these surveys. Further surveys will be performed prior to construction of any individual projects (according to
Mitigation Measure BIO-3C). Such projects will be subject to all mitigation for Impact BIO-3, which includes complete avoidance within 200 feet of raptor nests if breeding or nesting activity is present.

Response to Comment A-2-9. The purpose of new LRDP Policy SCEN-5 is to replace a variety of conflicting policies that applied different standards in different ways for different purposes with a clear statement of the primary values of trees as scenic and biological resources. By definition, “retaining” trees of significant scenic or biological value requires avoiding removal if feasible. The suggestion to replace oak trees at a 10:1 ratio is noted. LRDP Policy ESH-10 require the preservation of oak trees to the maximum extent feasible.

Response to Comment A-2-10. Improvements required by ESH-27 would be implemented at the time of development of the parcel on which the improvement is located.

Response to Comment A-2-11. Policies FIL-1 through FIL-3 are from the 1990 LRDP. No new development is proposed in natural watercourses, channels or wetlands.

Response to Comment A-2-12. LRDP policies protecting ESHA apply to all ESHA, whether or not a specific location is presently mapped or designated. If the location of ESHA on the campus changes, the campus will update its designations and maps as appropriate.

Response to Comment A-2-13. The location of existing coastal access parking spaces is identified on page E.9 of the LRDP. Other coastal access facilities are shown on page E.10. Major trails and bike routes are depicted on page E.4. Existing roads and parking lots are shown on page B.12 and page B.20 shows major current public access facilities, trails, and bike routes.

Response to Comment A-2-14. The University currently provides maps and signs directing visitors to coastal access locations and trails. In accordance with LRDP Policy TRANS-6, a signage program will be implemented along with new access and improvement of existing access points. Because the LRDP is a long range development program, specific signage locations will be determined on a project-level basis as part of project-level environmental review.

Response to Comment A-2-15. Section 4.13, pages 4.13-30 through 4.13-43 of the Recirculated Draft EIR present the parking conditions at the University. As shown in Table 4.13-15, 136 long-term metered parking spaces are provided for visitors of the coast to ensure public coastal access. The parking demand of these spaces was measured over a 5-day period in Spring 2007. Peak occupancy occurred on a Tuesday at 2:00 p.m. in which 64 vehicles were parked in the provided metered spaces resulting in a 47 percent occupancy rate. The chart on page 4.13-36 shows the average number of vehicles parked in the long-term metered spaces on a weekday. The chart indicates that on-average 65 percent of spaces are unoccupied.

Response to Comment A-2-16. A separated bike path from Storke and West Campus housing to the beach is not proposed because the only direct beach access on West Campus is and would be through the Coal Oil Point Reserve, Snowy Plover, and other sensitive habitats.

Response to Comment A-2-17. Please see “Response to Comment A-2-15” above regarding coastal parking use. The University has found that dedicated coastal access parking spaces are used by others as general short-term parking and does not appreciably increase coastal access opportunities. Dedicated coastal access parking spaces are located near the beach or coastal access trails and not in the interior of the Campus.

Response to Comment A-2-18. Policy D.16 refers to all development including the Devereux campus. The amount and type of proposed development on the Devereux campus is shown on page H.10. Assignable square feet is defined in the footnote of page 3.0-3 of the EIR.

Response to Comment A-2-19. Parking Lot 30 contains 369 spaces, as shown in EIR Table 4.13-13. The existing use is parking. The “recreation” designation reflects a formerly planned use that was not
implemented under the 1990 LRDP. Calculations of current and proposed recreation land on campus do not count Parking Lot 30 as recreation land.

Response to Comment A-2-20. Development on the Facilities Management site would occur on the southern side of University Road in a former military borrow-pit used for fill to build the Santa Barbara Airport. The area is approximately 30-feet below grade when measured from the south, paved as a “corporation yard” for vehicle storage, and developed with relocated WW II era buildings and trailers. As such the site is not likely to include significant biological resources. Views from off-campus, which includes views from Goleta Slough, are discussed starting on page 4.1-12 in the Aesthetics Section of the EIR. Project-specific environmental review will be conducted at the time such development is proposed. Facilities Management functions would be relocated to existing buildings or areas designated for development as shown on page H.8.

Response to Comment A-2-21. UC Santa Barbara’s planting does not include, and the LRDP does not propose, non-native or invasive plant species except for restoration, instructional, and recreational purposes. LRDP ESH policies generally prohibit or limit the use of non-native planting in sensitive areas.

Response to Comment A-2-22. As shown on Figure D.2, the LRDP designates the Devereux area for “Academic and Support Uses” and “Housing.” Permitted land uses within these designations are fully described on page H.3 of the LRDP.

Response to Comment A-2-23. LRDP Policy SH-3 would apply to maintaining existing man-made structures, which consist of the earthen berm protecting the Lagoon and revetment installed in the 1950s for bluff erosion protection. No new shoreline protective devices are proposed, because no LRDP development would require the protection of shoreline devices.

Response to Comment A-2-24. LRDP Figure C.1 shows the additional recreational fields west of the Isla Vista School, as well as academic and support development south-west of Isla Vista School.

Response to Comment A-2-25. The EIR addresses the impacts on nearby parks and recreational areas in Impacts REC-2 and REC-3. Impact REC-4 discusses the cumulative impacts resulting from the indirect, induced growth from University employment and population increases. That DEIR Section states the following (p. 4.12-30):

As discussed in Section 6.0 of this EIR, the implementation of the 2008 LRDP will result in indirect growth in area communities, including jobs directly or indirectly serving the University. The addition of this growth to area communities will increase pressure on existing facilities and increase the demand for new facilities.

The mitigation that would be required for this impact includes the following (p. 4.12-26):

LRDP Mitigation REC-2A: The University shall phase the construction of recreational facilities and playfields for each added increment of new enrollment. This additional recreation capacity will be available within four years of the enrollment increase.

LRDP Mitigation REC-2B: The University will continue to maintain adjacent beaches and coastal access trails for the use of all members of the public. These are:
- UCSB Beach
- Depressions Beach
- West Campus Beach
- West Campus Bluffs Trail
- Dune Pond Trail
- Lagoon Trail
- Campus Point access “unnamed trail” near the Aquarium
LRDP Mitigation REC-2C: In order to reduce the demand upon nearby County parks, the University will also provide recreation facilities in new housing developments, including the provision of tot lots and adult exercise facilities.

While the same mitigations are required for cumulative impacts as are required for direct impacts (REC-2A, REC-2B, and REC-2C), the cumulative impact remains significant and unavoidable because mitigation is within the jurisdiction and responsibility of other agencies and is not within the control of the University. Hence, the LRDP is consistent with the Coastal Act even though recreational facilities may require improvements to serve regional needs.

Response to Comment A-2-26. No new buildings and roadways are proposed in locations that would be subject to bluff erosion for 100 years. For information regarding bluff erosion rates, please see page 4.5-6 of Section 4.5, Geology.

Response to Comment A-2-27. Policy GEO-11 is revised as follows:

Pedestrian use of unimproved paths up and down the bluff shall be discouraged. To this end, a fence or other barrier shall be constructed at hazardous locations on the coastal bluff top edge wherever they do not currently exist. Fencing or other barriers installed along the blufftop shall be designed to be visually permeable, compatible with the character of the surrounding area, and of a specified height that would ensure safety while still allowing for views. Chain-link fencing is prohibited.

Response to Comment A-2-28. The 1990 LRDP policy would be amended in the 2010 LRDP; the portion related to “natural building materials and colors that are compatible with the surrounding landscape” was omitted because the policy was too subjective to allow consistent implementation. The LRDP does not propose any new pipelines on the face of campus bluffs. Therefore, the proposed policy has been amended as follows:

GEO-3. No development shall be permitted on the bluff face, except for staircases or access ways to provide public beach access and pipelines for instructional or research-oriented use.

Response to Comment A-2-29. The LRDP does not propose any new pipelines on the face of campus bluffs. Proposed LRDP Policy GEO-3 has been amended to reflect this. See above.

Response to Comment A-2-30. The table has been corrected as follows:

<table>
<thead>
<tr>
<th>Facility Name</th>
<th>Map Location</th>
<th>General Use</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Recreation Center (Rec)</td>
<td>4</td>
<td>Major indoor athletic facility for</td>
</tr>
</tbody>
</table>

Table 4.12-1. Formal Recreational Facilities on Campus
<table>
<thead>
<tr>
<th>Facility Name</th>
<th>Notes</th>
<th>Facilities and Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Events Center</td>
<td>2</td>
<td>Basketball, volleyball, wrestling, boxing</td>
</tr>
<tr>
<td>Robertson Gymnasium</td>
<td>3</td>
<td>Workout areas, classes, and gymnastics</td>
</tr>
<tr>
<td>Tennis Courts (20)</td>
<td>4</td>
<td>Tennis</td>
</tr>
<tr>
<td>Storke Field</td>
<td>5</td>
<td>Soccer</td>
</tr>
<tr>
<td>Sand Volleyball Courts (3)</td>
<td>6</td>
<td>Volley Ball</td>
</tr>
<tr>
<td>Robertson Field</td>
<td>7</td>
<td>Intramural and club sports</td>
</tr>
<tr>
<td>Lacrosse Pit</td>
<td>8</td>
<td>Lacrosse</td>
</tr>
<tr>
<td>Campus Pool</td>
<td>9</td>
<td>Outdoor pool with diving tank and diving board</td>
</tr>
<tr>
<td>Santa Barbara Harbor Sailing Facility</td>
<td>Not on map, at Santa Barbara Harbor</td>
<td>Sailing activities</td>
</tr>
<tr>
<td>Softball Field</td>
<td>44</td>
<td>Softball</td>
</tr>
<tr>
<td>Caesar Uyesaka Baseball Stadium</td>
<td>44</td>
<td>Baseball</td>
</tr>
<tr>
<td>Cachuma Lake Rowing Facility</td>
<td>Not on map, at Cachuma Lake</td>
<td>Rowing</td>
</tr>
<tr>
<td>Harder Stadium</td>
<td>42</td>
<td>Soccer, club sports (football program ended in 1992)</td>
</tr>
<tr>
<td>Old Gym</td>
<td>43</td>
<td>Pool and miscellaneous classes and clubs</td>
</tr>
<tr>
<td>San Rafael Pool</td>
<td>44</td>
<td>Swimming</td>
</tr>
<tr>
<td>Track</td>
<td>45</td>
<td>Track and field</td>
</tr>
</tbody>
</table>


Note: Please see Figure 4.12-1 for reference.

Response to Comment A-2-31. The text on page 4.12-28 has been amended as follows:

These policies are consistent with the Coastal Act and will protect coastal resources. However, as stated under Impact REC-2, implementation of the 2008 LRDP may indirectly impact coastal access and other coastal recreational areas (including upland facilities within the coastal zone) that are areas maintained by other agencies. Implementation of the monitoring program mitigation outlined in Mitigation REC-2AB would reduce potential impacts. With the implementation of the above-mentioned 2008 LRDP policies and Mitigation REC-2AB, impacts to coastal access and coastal recreational resources will be less than significant.

Response to Comment A-2-32. The mitigation text on page 4.7-30 has been amended as follows:

LRDP Mitigation HYD-2A: The University shall install and maintain technologies effective at removing sediments and otherwise treating runoff, including Continuous Deflective Separation devices or similar technologies and methods, such as Low Impact Development Techniques. Technologies selected shall reduce particulate matter. The improvements shall be implemented concurrently with the construction of individual projects.

LRDP Mitigation HYD-2B: Proposed storm drain improvements shall be sized appropriately to convey runoff resulting from a 25-year storm
after buildout of the LRDP has occurred. Proposed sewer line improvements shall accommodate buildout of the LRDP. The improvements shall be implemented concurrently with the construction of individual projects.

Response to Comment A-2-33. An additional mitigation measure has been added to Impact HYD-2 (p. 4.1-30), as follows:

\[
\text{LRDP Mitigation HYD-2C: Bioswales shall be considered as methods to decrease the velocity of surface water runoff and retain stormwater runoff on-site provided that they are not constructed as or considered to be wetlands or environmentally sensitive habitat.}
\]

Response to Comment A-2-34. The DEIR requires the treatment of stormwater prior to discharge as provided in Mitigation HYD-2A (see above).

Response to Comment A-2-35. The determination of “normal years” was made by the Goleta Water District, and is contained in the Water Supply Assessment for the City of Goleta as well as the GWD Urban Water Management Plan. As explained on page 19 of the GWD’s 2005 UWMP, normal years “are those years when runoff conditions are considered average or above average, and surface water supplies in both northern California (source of SWP water) and Santa Barbara County (runoff from Cachuma Lake) are sufficient for the District to receive its regular entitlement […].”

Response to Comment A-2-36. As explained in Master Response – Water Supply section I, the water supply analysis was revised to incorporate the projections and analysis contained in the Goleta Water District’s 2008 Water Supply Assessment adopted in connection with the City of Goleta General Plan and was recirculated as part of the RDEIR. The WSA does not account for the growth under the LRDP. The analysis of the water available to serve such growth is the subject of the RDEIR’s analysis.

Response to Comment A-2-37. Please see Master Response – Water Supply section V.B.

Response to Comment A-2-38. Regarding the conclusions of the RDEIR’s water supply analysis, please see Master Response - Water Supply section II;

Regarding GWD’s willingness to provide the University with available water, please see response to comment A-9-3.

Regarding the potential acquisition of additional State Water Project supplies, Mitigation Measure W-3F does not direct the University to acquire water directly from the State Water Project itself. Instead, it requires the University to “identify and acquire additional water supplies. As discussed in Master Response – Water Supply section VI.B, at least one agency on the Central Coast has indicated that it has potentially available for acquisition.

Regarding the process of developing the RDIER’s analysis, please see Master Response – Water Supply section 1.

Response to Comment A-2-39. Regarding the conclusions of the RDEIR’s water supply analysis, please see Master Response - Water Supply section II;

Regarding GWD’s willingness to provide the University with available water, please see response to comment A-9-3.

Regarding the potential acquisition of additional State Water Project supplies, Mitigation Measure W-3F does not direct the University to acquire water directly from the State Water Project itself. Instead, it requires the
University to “identify and acquire additional water supplies. As discussed in Master Response – Water Supply section VI.B, at least one agency on the Central Coast has indicated that is has potentially available for acquisition.

Regarding the process of developing the RDIER’s analysis, please see Master Response – Water Supply section 1.

Response to Comment A-2-40. Parking provided for the San Clemente housing project exceeds its actual use and therefore was not used as a campus-wide standard. Parking for new residences does not provide public coastal access and, therefore, is not relevant to Coastal Act requirements.

Response to Comment A-2-41. LRDP Impact TRAFFIC-10 and LRDP Mitigation TRAFFIC-10A discuss the LRDP’s potential parking impacts in Isla Vista. As stated in the Draft EIR, this impact could be reduced to a less-than-significant level through a resident parking permit and enforcement program. The University has worked with the County of Santa Barbara on such a program that is presently under consideration by the California Coastal Commission. Because the outcome of the program before the Commission is uncertain, and because this mitigation would be partially outside the control of the University, this impact was identified as significant and unavoidable. The University has adequate parking supply on-campus to accommodate parking demand as shown in Table 4.13-13 in the Recirculated Draft EIR.

Response to Comment A-2-42. The mitigation monitoring program is outlined under LRDP Mitigation TRAFFIC-1A Section 2 in the Recirculated Draft EIR and is only one of several proposed mitigation measures. Increases in traffic volumes will be determined through mitigation monitoring and the University will quantify traffic volume changes through the collection of actual traffic counts at campus gateways and nearby intersections. The monitoring program will be used to identify the appropriate timing for the implementation of mitigation measures requiring physical roadway improvements, such as those listed in Mitigation Measure TRAFFIC-1A.

Response to Comment A-2-43. Under Impact and Mitigation Measure TRAFFIC 8, the transportation study summarizes project transit ridership with the LRDP based on current mode split data. The LRDP includes a mitigation measure (TRAFFIC 8A) pursuant to which the University will work with the Metropolitan Transit District to enhance transit service with the proposed LRDP.

Response to Comment A-2-44. LRDP Mitigation Measure TRAFFIC-1A Section 2 requires the University to promote and enhance its transportation demand program with a goal of a 10% reduction in single-occupancy vehicle use. Similarly, pursuant to Mitigation Measure TRAFFIC 8, the University will work with the Santa Barbara Metropolitan Transit District to determine appropriate improvements, potentially including enhanced transit service, to accommodate Campus growth.

Response to Comment A-2-45. The LRDP explains that the Isla Vista Master Plan (IVMP) has been adopted by the Board of Supervisors but not certified by the California Coastal Commission as of the time of its writing (LRDP, p. B.4). LRDP Figures B.3 and B.4, which includes the IVMP’s land use designations, are included to explain the current planning context in the Campus’ vicinity.


Response to Comment A-2-47. Existing housing is shown on LRDP Figure B.9 and proposed academic and support uses and housing are shown on Figures D.3 and D.4. Existing and proposed open space is shown on Figure F.1, while transportation systems can be found on Figure E.1.

Response to Comment A-2-48. Comment noted.

Response to Comment A-2-49. Comment noted.
Response to Comment A-2-50. Comment noted.
June 18, 2008

Ms. Alissa Hummer
Office of Campus Planning and Design
Facilities Management
c/o Vision 2025
University of California, Santa Barbara CA 93106-1030
Fax No.: (805) 893-3870

SCH # 2007051128, Santa Barbara County

Dear Ms. Hummer:

The Department of Fish and Game (Department), has reviewed the Draft Environmental Impact Report (DEIR) for impacts to biological resources. The University of California at Santa Barbara (UCSB) proposes the development, redevelopment, and preservation of land on its 1,055 acre campuses to accommodate projected growth in enrollment of 5,000 students and associated growth in faculty and staff of 1,736, by the year 2025. This Long Range Development Plan (Plan) includes about 2.5 million ft.² of new academic and research facilities, and new on-campus housing, parking facilities, roads, bicycle paths, trails, coastal access, and associated utilities.

Habitat types with the potential to be impacted by the project include coastal scrub, coyote bush scrub, coast live oak woodland, eucalyptus woodland, saltwater and freshwater marsh, and non-native grassland. Wildlife with the potential to be impacted by the project include the Federally Threatened and State Species of Special Concern western snowy plover (Charadrius alexandrinus nivosus), the State Endangered Belding’s savannah sparrow (Passerculus sandwichensis beldingi), the State Species of Special Concern burrowing owl (Athene cunicularia), California horned lark (Eremophila alpestris actia), and loggerhead shrike (Lanius ludovicianus), the California Native Plant Society List 1B southern tarplant (Centromadia parryi ssp. australis), and the monarch butterfly (Danaus plexippus).

Measures proposed to mitigate impacts include:

- a wetlands protection and restoration plan;
- a southern tarplant protection and restoration plan; and
- a nesting bird avoidance plan.

The following statements and comments have been prepared pursuant to the Department’s authority as Trustee Agency with jurisdiction over natural resources affected by the project (CEQA Guidelines §15386(a)). As trustee for the State’s fish and wildlife resources, the Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species.

Conserving California’s Wildlife Since 1870
California Wildlife Action Plan

The California Wildlife Action Plan, a recent Department guidance document, identified growth and development as an important habitat stressor affecting wildlife within the project area (Bunn, et al., 2007). A recommended Statewide Conservation Action which addresses this stressor is:

“Wherever possible, infrastructure development projects should be sited near existing urban areas and development corridors and away from areas that are relatively undeveloped or with significant biological resources.”

This recommended action is used as the foundation for the following comments.

Impacts to Sensitive Biological Resources

On-campus housing at the West Campus Mesa site is proposed to be constructed in coyote bush scrub and non-native grassland habitats. These habitats are capable of supporting breeding and foraging habitat for three of the special status species listed above: California horned lark, burrowing owl, and loggerhead shrike. The state-listed endangered Belding’s savannah sparrow is described in the DEIR as having potential for nesting in the proposed Devereux housing area. We could find no analysis in the DEIR of impacts related to removal or disturbance of these habitats or potential impacts to the special status and/or listed species which could be found there. We therefore recommend the DEIR provide information on acreage of habitats proposed to be impacted, an analysis of potential impacts to habitats and species (including those indirect impacts resulting from an increase in people using the area), and appropriate mitigation measures to reduce impacts (including pre-construction surveys and avoidance measures). Protocol surveys have been developed for burrowing owl (attached).

A California Endangered Species Act (CESA) permit must be obtained if the project has the potential to result in “take” of species of plants or animals listed under CESA, either during construction or over the life of the project, pursuant to Fish and Game Code Section 2050 et seq. CESA permits are issued to conserve, protect, enhance, and restore State-listed threatened or endangered species and their habitats. The procedure for obtaining a CESA permit may be found at the Department’s website at http://www.dfg.ca.gov/hcpb/ceqacesa/cesa/cesa.shtml.

Tree Removal

The DEIR proposes the removal of an unspecified number of mature trees over the life of the project. No analysis of the number or species of trees predicted to be removed (other than eucalyptus windrows on the Main Campus) was presented in the DEIR. The Department finds that trees provide wildlife benefit (e.g., bird nesting, roosting and foraging habitat and monarch butterfly over-wintering and roosting habitat) and their removal should therefore be mitigated.

The Department mitigation standard for removal of mature native trees (8 inch or greater DBH) is replacement at a ratio of 10:1 (10 replacement trees for every tree removed). The County of Santa Barbara recommends an oak tree replacement ratio of 10:1 (County of Santa Barbara Oak Tree Protection Program Final EIR, 00-EIR-07). This ratio accounts not only for the less than 100% long-term survival rate for replacement trees (as little as 10%), but also mitigates for the habitat which is lost until the replacement trees reach functional maturity. In order to adequately mitigate the loss of non-native trees, the Department recommends a replacement ratio of 5:1. We recommend the replacement trees be native sycamore, oak, or
other native tree species. To ensure long-term survival, spacing of all replacement trees should be 20 feet minimum and they should be monitored, nurtured, and protected within the dripline so they survive a minimum 5 years.

The Department has commented on this issue in a similar fashion several times since 2003 in our role as a CEQA trustee agency, in letters to UCSB (Education and Social Sciences Building Project, SCH #2004011057; California Nanosystems Institute and Parking Structure Project, SCH #2002041020; San Clemente Graduate Student Housing Project and El Colegio Road Improvements, SCH #2003021071; Psychology Building Addition and Renewal Project, SCH #2002121084; Residential Life Resource Center Project, SCH #2003021046; Snidecor Hall Replacement Facility Project, SCH #2003031010; Student Resource Building Project, SCH #2003031009).

**Cumulative Impacts**

CEQA §15130 (a) requires a lead agency to discuss cumulative impacts of a project or describe its basis for concluding that the incremental effect is not cumulatively considerable. Section 4.3-2.4 of the DEIR discusses how impacts to biological resources from the proposed project will contribute incrementally to the cumulative effects of other proposed and implemented projects in coastal Santa Barbara County. It was determined in the DEIR that the proposed project's contribution to cumulative impacts is less than significant, and therefore no mitigation is required. The basis for this determination was the proposed protection of habitats on the UCSB campus and other local habitat protection programs.

The Department disagrees with this determination. It does not appear a complete evaluation of the impacts to biological resources associated with this project, together with other projects in the vicinity causing related impacts, was performed as required by CEQA (CEQA §15130(b)). For example, indirect impacts related to tree removal (e.g., removal of nesting and foraging habitat) resulting from the proposed project were not evaluated either for the proposed project or other projects, and we were therefore unable to evaluate the application of habitat protection programs as effective mitigation, as required by CEQA (CEQA §15126.4). In a similar manner, cumulative impacts to non-native grasslands and coyote bush scrub habitats resulting from the proposed West Campus Mesa housing were not evaluated.

The Department therefore recommends cumulative impacts resulting from the proposed project be evaluated in the DEIR. The analysis should include, at a minimum, cumulative impacts of tree removal on nesting and resident and migrating birds and monarch butterflies, and direct and indirect impacts to scrub habitats and other habitats associated with Devereux Slough.

**Proposed Alternatives**

Four alternatives to the proposed project (including the No Project alternative) were considered in the DEIR. The No On-Campus Housing alternative is described as resulting in a reduction in direct and indirect impacts to campus biological resources; the Department agrees with this analysis. However, the DEIR concluded that the elimination of proposed housing on campus would be offset by needed housing construction off-campus, potentially in sensitive habitats, and concluded the No On-Campus Housing alternative would have impacts to biological resources similar to the proposed project.
We did not find presented in the DEIR any data, references, or other information used to support the above conclusion, and we believe it to be speculative in nature, and not based on substantial evidence in the record, as required by CEQA (CEQA Guidelines §15064(f)(5)). We also believe this conclusion to be inconsistent with the requirement in CEQA for alternative analyses to contain sufficient information to allow meaningful evaluation (CEQA Guidelines §15126.6(d)).

The Department therefore does not agree USCB has presented the information necessary in the DEIR to conclude that the elimination of on-campus housing on UCSB would result in comparable housing construction off-campus, and thus have similar impacts to biological resources, as presented in Table 5.0-1. We recommend UCSB present additional analysis or references to support its conclusion of similar impacts to biological resources from the No On-Campus Housing alternative, or amend its conclusion to one of a reduction in impacts to biological resources. (Note: There appears to be an error in the Key to Table 5.0-1 - Summary of Proposed Alternatives compared to Proposed 2008 LRDP. It appears the minus sign in the Table should represent less, not more, adverse impacts).

We also offer as a suggestion a modified No On-Campus Housing alternative: eliminate only west campus housing which is proposed east of and adjacent to Devereux Slough (West Campus Mesa and Devereux, not including the proposed West Campus Apartments). This would eliminate the majority of potential direct and indirect impacts to Devereux Slough and surrounding habitats resulting from the project, and we believe would result in a substantial reduction in overall impacts to biological resources.

In conclusion the Department believes the DEIR does not adequately evaluate potential project impacts and present appropriate mitigation. The DEIR is described as a program EIR. As a program EIR, future environmental analysis may be tiered, pursuant to CEQA Guidelines §15152, for subsequent activities in the program, to determine if additional environmental documents should be prepared. However, use of a program EIR should not result in any deferral of performing adequate and feasible environmental analysis for the proposed project. CEQA Guidelines §15152(b) states, in part:

"...Tiering does not excuse the lead agency from adequately analyzing reasonably foreseeable significant environmental effects of the project and does not justify deferring such analysis to a later tiered EIR or negative declaration."

Thank you for this opportunity to provide comment. Questions regarding this letter and further coordination on these issues should be directed to Mr. Martin Potter, Environmental Scientist, at (805) 640-3677.

Sincerely,

[Signature]

for
Edmund J. Potter
Regional Manager
South Coast Region

Attachment
Reference


cc:  Ms. Helen Birss
     Department of Fish and Game
     Los Alamitos, California

     Ms. Betty Courtney
     Department of Fish and Game
     Santa Clarita, California

     Mr. Martin Potter
     Department of Fish and Game
     Ojai, California

     Ms. Mary Meyer
     Department of Fish and Game
     Ojai, California

     Mr. Scott Morgan
     State Clearinghouse
     Sacramento, CA

EP:mp
Letter A-3
Edmund J. Pert, Regional Manager
South Coast Region
CA Dept. of Fish & Game

June 18, 2008

Response to Comment A-3-1. There have been no recent sightings of California horned lark on Campus lands (as discussed on page 4.3-20) and burrowing owl has not been observed on West Campus since 1998. Loggerhead shrike is known to be present within Campus lands, including currently undeveloped West Campus areas, as noted in the DEIR on page 4.3-21.

No development is proposed within 100 feet of salt marsh habitat used for breeding by Belding's savannah sparrow (please see Mitigation BIO-1D on page 4.3-31 of the EIR and LRDP Policy ESH-16, cited on page 4.3-36).

Exact calculations of coyote bush scrub and annual grassland habitat loss, and analysis of specific impacts to associated sensitive species resulting from implementation of individual components of the LRDP cannot be made at this time, but will be conducted during project-specific environmental review as the project designs are developed.

Response to Comment A-3-2. Comment noted.

Response to Comment A-3-3. Campus policies recognize the biological and aesthetic value of trees, and tree planting and tree replacement is a regular component of project landscaping designs. BIO Impact 3 and LRDP Policies ESH-4 and 5 specifically protect nesting and roosting habitat associated with Campus trees. Policy ESH-16 requires native tree plantings along Devereux Road as part of housing development on West Campus Mesa. In addition, the following mitigation measure has been added to Impact BIO-3 (p. 4.3-41):

<table>
<thead>
<tr>
<th>LRDP Mitigation BIO-3D:</th>
<th>To mitigate impacts to wildlife habitat the University shall apply the following replacement ratios for mature trees (8 inches or greater diameter at breast height) which are removed by LRDP construction:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• 10:1 for mature native trees; and</td>
</tr>
<tr>
<td></td>
<td>• 3:1 for mature non-native trees.</td>
</tr>
</tbody>
</table>

Replacement trees shall be either sycamore, oak, or another native tree species. In the case when oak trees are removed, oak trees shall be used for replacements. Placement of replacement trees should be 20 feet minimum, and they shall be monitored, nurtured, and protected within the dripline to encourage survival of a minimum of 5 years.

All trees of other biological importance shall be replaced at a ratio of 3:1.

Project-specific review of particular development projects will, pursuant to CEQA, provide a complete analysis of any tree removals.
Response to Comment A-3-4. A central component of the 2010 LRDP is to develop on lands previously disturbed. The DEIR analyzes impacts to grasslands, nesting birds, and monarch butterfly habitat (see Section 4.3, Biology). The determination was made, based upon evidence in these specific topical discussions, that there would be no significant impact to these resources (see Impact BIO-3, on page 4.3-40). As discussed in the Biology section, a review of other proposed development projects in the region identified a potential for ongoing cumulative impacts (p. 4.3-42). The determination was made, based upon the analysis of the specific resources, that the University’s contribution to a cumulative impact would not be significant. In addition, and as identified in the section (Impact BIO-1, BIO-2, etc.), the University is surrounded by protected habitat that will not be developed.

Response to Comment A-3-5. As stated in the Alternatives Section (5.0),

“By reducing the total development footprint, and eliminating housing projects identified in the 2008 LRDP in the more sensitive fringe areas of campus, this alternative would reduce direct and indirect impacts to campus biological resources. However, this alternative has the potential to cause impacts to sensitive habitat off-campus. New housing would need to be developed in the region, particularly in the communities of Goleta and Santa Barbara, where most off-campus University affiliates currently reside. This development could have impacts on sensitive habitat or special status species in these areas. Impacts are considered significant but mitigable, similar to the proposed project.” [emphasis added].

The site-specific location and impacts of off-campus housing under this alternative are, as the commenter notes, speculative. However, it can be said with certainty that increased enrollment would lead to increased housing demand. Some of this demand would be met by existing housing, and some would likely trigger new development.

New development could have impacts on sensitive habitats, whether on or off campus, although it is impossible to quantify such impacts in the absence of a proposed project. The Campus is a fairly typical example of the developable land in the region, with a mixture of previously-disturbed land and sensitive habitats. Thus, the DEIR concludes that impacts to habitats and species would likely be similar whether housing is provided on or off campus. Please see recirculated Section 4.10, Population and Housing, for information regarding regional housing.

Response to Comment A-3-6. The suggested alternative would not fulfill the project objectives to house 100% of additional students. In addition, as discussed on page 5.0-2 of Alternatives Section, relocation of growth off campus was determined to be infeasible due to scarcity of land available, further biological resource constraints, and other resource limitations such as the water supplies of other jurisdictions. Biological impacts were determined to be similar whether development occurs on campus or off campus due to the nature of resources in the area, and the fact that shifting housing off campus would merely shift impacts to another location and not fulfill CEQA requirements to reduce impacts of the project as proposed.

Response to Comment A-3-7. The commenter is referred to responses to comments A-3-1 to A-3-6, above.
June 23, 2008

Alissa Hummer, Senior Planner
Office of Planning and Design
University of California at Santa Barbara
Santa Barbara, CA 93106

Subject: University of California at Santa Barbara Long Range Development Plan 2008 Draft Environmental Impact Report

Dear Ms. Hummer:

Thank you for the opportunity to review the University of California at Santa Barbara Long Range Development Plan 2008 Draft Environmental Impact Report (DEIR). The plan period is from 2008 – 2025. The project appears to accomplish a number of tasks for the University by year 2025. These tasks include increasing the student population by 5,000 for a total student population of 25,000; increasing faculty and staff by 1,736 for a total of 6,289; constructing on-campus University housing to provide residence for these population increases; and to improve or modify existing University infrastructure, academic and support buildings, recreational facilities and improve coastal access. The DEIR indicates that the plan is anticipated to increase the total University-affiliated population to 36,500.

The DEIR acknowledges the plan will contribute to and result in unacceptable conditions with significant impacts with respect to regional and local transportation. The University acknowledges these impacts as well as acknowledging that it has a responsibility to mitigate those impacts – whether the impacts affect the University campus, the City of Goleta, the County of Santa Barbara, or on State highway facilities. For that reason, the Regents should be congratulated for their candor and willingness to partner with adjacent jurisdictions in order to “Contribute to Regional Solutions”. You acknowledge that the Plan effects go beyond your borders and express willingness to “work closely with adjacent jurisdictions to design, fund and build a superior infrastructure.” (page 3.0-26).

Toward that end, the Department gladly accepts your willingness and requests to meet with project staff and University decision-makers prior to certification of the EIR and release of the Final EIR. The meeting purpose would be to strengthen our working relationship, identify more clearly locations on the State Highway System that the University can focus mitigation efforts toward, and to articulate bilaterally in more clear and quantifiable terms the University’s responsibilities that may reduce the project’s

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transportation impact on the State Highway System. An additional objective would be to arrive at agreement for specific language that could be included in the FEIR. Please contact Chris Shaeffer of my staff at (805) 549-3632 to schedule this important discussion.

Some of the greatest attributes that the University of California system can offer toward reducing impacts from a project such as this is its inherent leadership, desire for innovation, and the ability to raise the standard and expectations of those working, living, and attending the institution. University policy can provide a systemic framework that supports and advances the sustainable practices identified in paragraph 4, page 3.0-26, specifically reducing reliance on autos and implementing alternative transportation programs. While it appears much is being done in terms of encouraging alternative modes, there is more that can be institutionalized. For example, a simple prohibition concerning automobile use by all on- and off-campus freshman and sophomores might greatly permanently decrease transportation and air quality impacts, green house gas emissions, use of fossil fuels, and assist in shaping the lifelong stewardship practices of University students. The second and third order effects of a policy like this would need examination to be sure, but where better to start than at a University that champions environmental stewardship. The University could consider an initiative that explores the efficacy of a complementary action in the form of tuition reduction or other equitable yet universal and substantive incentive that rewards compliance with a no auto policy and instead using bicycles, transit, or walking.

Keeping the preface above in mind, the Department has a number of concerns with the DEIR. To address these concerns will require additional analysis prior to the FEIR, and the Department would be interested in providing guidance on the additional work if possible. The Department offers the following comments, presented in the same order that the information in Section 4.13 is presented:

1. Study Locations/Segments/Intersections.
   a. The half interchange of US 101 / SR 217 should have been the subject of its own freeway interchange and operational analysis, particularly since SR 217 essentially serves the University and provides the Eastern Gateway. This would include the Patterson Road / US 101 interchange ramps. This would be included on page 4.13-9. Although the half interchange is “zoomed in” on figure 4.13-3, no further analysis is provided.

   b. US 101 segment from SR 217 to SR 154. Although a metering effect occurs over time and distance along US 101, the size of the University is sufficient to require a more regional analysis. The freeway segments within the existing analysis provide

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a localized snapshot of the project’s effects. This segment would be included on page 4.13-9.

2. Traffic Volumes and Peak Hour.
   a. Traffic counts were obtained in February 2007 for all off campus locations. The DEIR should discuss whether or not seasonal variations are required to be factored into volumes.
   b. The graphs on page 4.13-4 need adjustment to depict the peak period.
   c. The peak hour discussion pertains to facilities adjacent to and off campus of the University, typically named the commute time. The DEIR should identify and discuss the University’s a.m. and p.m. peak hour as well. It may be the same as the adjacent facilities, or it may be earlier in the afternoon.

3. Freeway Facilities, Figure 4.13-3. The ramp junction analysis for US 101 / Fairview Ave should be included.

4. Existing Operating Conditions. Table 4.13-8 indicates that the US 101 / Los Carneros Road ramp intersection are operating at LOS A / B. The Santa Barbara County of Area Goverments (SBCAG) indicates in the Congestion Management Program Annual Report (April 2008) that the ramp intersection are operating at LOS C / v/c 0.75. That’s a substantial difference. Please re-evaluate those ramp nodes to set an up to date baseline condition as well as re-evaluating in the Plan year.

5. Bicycles and Pedestrians. The DEIR discusses the importance of mobility provided by these modes and offers usage percentages by students and faculty/staff. The Department supports all efforts designed to improve access and increase usage of these modes. However, it is also a fact that these modes affect motorized vehicle service levels at intersections. Analytical methods are available which calculate bicycle and pedestrian LOS’ and also their affects on motorized traffic. The DEIR omits any discussion of this topic. Given the existing and future large volumes of these modes, complete analyses should be included in the DEIR. This would include assessment of how improvements specific to these modes, both on- and off-campus will benefit these uses. This will also provide the University with information that can be used to craft and implement mitigation measures specific to these modes within the campus, adjacent to highways, and within adjacent jurisdictions.
   a. Using this type of information would also enhance the University’s unique position to establish institutional facilities supporting these modes. For example, in addition to increasing bicycle parking areas, showers and changing stations, and the network itself, a student-run entity that provides bicycle loans or a bike purchase program, a

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bike maintenance facility, and a bicycle usage advocacy program connected to an University sponsored incentive program could be very useful.

6. Transit. The University appears to have an excellent program in place. Policies ACC-3 and ACC-4 are laudable goals. However, there does not appear to be specific discussion that explores increasing either service capacity (specific number of buses or increasing frequency of stops) or usage incentives to serve the additional 5000 students and 1400 faculty (and their families) to use transit for trips off-campus. Impact TRAFFIC 8 and Mitigation TRAFFIC-8A should discuss quantifiable and measurable solutions. This is particularly important for region-wide mobility.

7. Transportation survey data, Table 4.13-23. The student data is based on a 2002 survey. This should be updated to provide current year data. Quantifiable data such as this should be no older than 2 years in order express current trends and mode choice.

8. Standards of Significance, paragraph 4.13.2.1, third bullet. It is not clear why a ratio of a 1% traffic volume increase is presented when Table 4.13.24 provides established quantifiable thresholds.

   a. Trip Generation. Pages 4.13-58 – 59, Tables 4.13-28 through –31. The project’s trip generation, particularly off-campus, is crucial to understanding project impacts to adjacent jurisdictions and facilities. The data presented appears to indicate that the project (less adjustments) will generate 1604 a.m. peak hour trips and 2170 p.m. peak hour trips external to UCSB.

   b. Trip Generation. On page 3.0-27, the table identifies 124,400 square feet of commercial land use that will be added by the project. On page 3.0-29, “neighborhood serving retail” is referenced vaguely. On page 3.0-30, “minor commercial services” are included in the recreational and/or sports fields improvements. None of these new uses are quantified in terms of Trip Generation. These uses typically are trip generators and trip attractors and should be included.

   c. Trip Distribution. Using the trip generation data, the DEIR should depict a project specific trip distribution onto the transportation network. The depiction should be incorporated into the DEIR as a separate figure prior to the set of Figures beginning at 4.13-8A and 4.13-12. Separate figures depicting percentage of trip distribution should also be included.

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d. After the network trip distribution is done, specific impact analysis should be re-evaluated and specific, quantifiable mitigation measures articulated.

e. 2025 Roadway Network Assumptions. The DEIR should include an additional analytical component that includes a 2025 roadway network based on SBCAG's Metropolitan Transportation Plan, Goleta's GTIP, and Santa Barbara County's CIP. These programs include improvements at US 101 and SR 217 ramp terminals and overcrossing, and the US 101 six lane widening in Goleta. When combined with accurate project trip distribution, this should quantify specific project impacts and mitigation responsibilities in which the University can participate.

f. Traffic Modeling Scenarios. Scenario 5, year 2025 without on-campus housing, should undergo the same impact and LOS analysis as the first four scenarios. This will provide the public and decision-makers a complete perspective on the consequences to the transportation network if on-campus housing is not built to accommodate the proposed enrollment and faculty increases. This will require re-evaluation of the network and modification of numerous tables and traffic impact discussions.

g. Travel Modeling and forecasts. The DEIR should provide evidence that the project's trip generation, distribution, assignment, and modeling presentations are consistent with the regional model and have been validated by SBCAG.


a. The DEIR acknowledges the proposed LRDP will have a significant impact on Caltrans' facilities.

b. Measure 1: The Department supports the concept and goal of trip reduction by enhancing TDM measures. However, as a mitigation measure, this should contain quantifiable implementation tasks, supported by committed resources or incentives, and a measurement of how this increases the existing TDM conditions. Specific measures of effectiveness (MOE) and when and how they will be evaluated should be included. Lastly, a discussion of the consequences, if the MOE's are not met to enhance TDM practices and how that will impact the LOS on Caltrans' facilities should be included.

c. Measure 4: Implementing a mitigation monitoring program and data collection isn’t in itself a mitigation measure that reduces project impacts. It is nevertheless good practice that should be sustained to validate assumptions and conclusions of the

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DEIR. The period of monitoring should be consistent with SBCAG annual congestion monitoring program and the results disseminated to regional and local partners.

d. Measure 5: "Work with Caltrans…to determine the appropriate transportation improvements…to accommodate campus growth…” does not provide specific mitigation to reduce LRDP impacts. However, as stated on page one above, the Department gladly accepts your willingness to work with us and requests to meet with project staff and University decision-makers prior to certification of the EIR and release of the Final EIR. The meeting purpose would be to strengthen our working relationship, identify more clearly locations on the State Highway System that the University can focus mitigation efforts toward, and to articulate in more clear and quantifiable terms the University’s responsibilities that may reduce the project’s transportation impact on the SHS. An additional objective would be to arrive at agreement for specific language that could be included in the FEIR.

e. Measure 6: The Department looks forward to implementation of this mitigation measure. In order to facilitate and memorialize our efforts, we request to meet with project staff and University decision-makers prior to certification of the EIR and release of the Final EIR. To ensure that our efforts are objective and quantifiable, the Department urges the University to implement the re-evaluation discussed in paragraph 9 above.

f. Measure 6: It appears that the DEIR offers two freeway improvements to mitigate all project freeway impacts: widening US 101 to six lanes from Storke to Fairview and to eight lanes from East of SR 217 to Turnpike. The six lane project is listed in SBCAG’s 2004 MTP at a cost of $18,000,000. A Project Study Report (PSR) was prepared in the late 1990’s for this project. This PSR could be refreshed and costs updated from which a pro-rata share can be determined. The eight-lane project does not exist. It is not clear how this improvement was derived or the background for its consideration. It is reasonable to state that widening US 101 to eight lanes in this area is unrealistic and must not be relied upon when discussing or proposing mitigation. The DEIR should re-evaluate mitigation measures for this segment of US 101. Transportation System Management strategies should be thoroughly explored. For example, the half interchange at US 101 / SR 217 could be ramp-metered in the eastbound direction. The DEIR could explore the efficacy of smaller, operational improvements such as auxiliary lanes or improving the SR 217/US 101/ Patterson Road interchange network. The DEIR could include a mitigation measure of building a ramp-metering network. This would require

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additional analysis than is currently presented in the DEIR. These are additional
topics that the Department and the University can discuss at our meeting.

11. Other issues.

a. University affiliated population. The LRDP anticipates that in year 2025 a total of
36,500 affiliates will populate UCSB. Page 3-18 identifies this population as
students, staff, faculty and affiliates. On page 4.10-1, the term includes student
families. This probably includes faculty and staff families as well. On page 4.10-
1, visitors and vendors are mentioned as being distinct from affiliates. It does not
appear that the transportation impact and mitigation discussion captures the
anticipated “affiliate” increase. The document should clearly define what or who
affiliates are in this context, quantify the existing number of affiliates and the
extent to which the proposed project will increase that number, and included into
the analysis. Otherwise, there are approximately 5000 “affiliates” that are not
discussed or captured in the traffic analysis discussion.

b. Commercial and Vendor activities. The DEIR anticipates a substantial increase in
building construction of various uses. The traffic analysis discussion omits all
discussion of the existing number of vendors and commercial activities and how –
or if- the project will increase this population. Please discuss.

c. Faculty and Staff. Sections 4.10 and 3.0 discuss existing and proposed increase in
the faculty and staff. Section 4.10 discusses the nuances of academic and non-
academic faculty and staff. Section 3.0 discusses FTE, with and without students,
and headcount. The population variability is further complicated by the school
year for which the data represents. Please provide one table that clearly expresses
the base year, the base year population, and faculty and staff increase.

d. Students. In the same fashion, varying number of student population are presented
in the DEIR. On page 3.0-6, the current academic year there are 21,410 students.
In Table 3.0-4 there are 21,082 students in 2006-07. The DEIR seems to indicate
that base year is 20,000 students with an annual increase of 1% per annum to 2025.
Please provide one table that clearly expresses the base year, the base year
population, the current year population and a discussion whether or not the
projections and assumptions are valid given the actual population.

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There is no question the LRDP is an important project. Providing increased opportunities for higher education in pre-eminent institutions are statewide and national goals. The DEIR appreciates that the pursuit of those goals, however, should not eclipse growth impacts to neighboring jurisdictions and community partners. The Department is very supportive of higher education and its expansion, and as a supporting partner to our States’ finest institution, we look forward to working with you further and at greater length prior to this project’s approval.

Please contact Chris Shaeffer of my staff at (805) 549-3632 to schedule this important discussion.

Sincerely,

[Signature]

Larry Newland, AICP
Branch Chief, South District 5
Planning and Development Review

[Address]

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Response to Comment A-4-1. The additional analysis requested in this comment is presented in the Recirculated Draft EIR Transportation & Circulation Section 4.13 (Tables 4.13-8, 12, and accompanying discussions).

Response to Comment A-4-2. The additional analysis is presented in the Recirculated Draft EIR Transportation & Circulation Section 4.13 (p. 4.13-11). The US 101 mainline segment south of SR 217 was included in the augmented recirculated analysis. Based on output for the travel demand forecasting model, traffic volume changes beyond this segment were minimal (less than 2 percent) and were therefore not analyzed (EIR, p. 4.13-113).

Response to Comment A-4-3. The only likely seasonal variation in traffic volumes within the study area is the decline during the summer months, due to the decline in student population. The traffic counts were collected under full enrollment conditions. Because the summer variation would reduce traffic counts as compared to the counts used in the analysis, relying on the February counts provides an accurate picture of peak conditions.

Response to Comment A-4-4. The graph has been updated as requested in this comment is presented in the Recirculated Draft EIR Transportation & Circulation Section 4.13.

Response to Comment A-4-5. The additional analysis requested in this comment is presented in the Recirculated Draft EIR Transportation & Circulation Section 4.13. The graphs on page 4.13-4 display the distribution of daily traffic volumes for on-campus roadways and conclude that the peak hours of campus traffic occur during the typical a.m. and p.m. peak hours of the adjacent facilities.

Response to Comment A-4-6. The additional analysis requested in this comment is presented in the Recirculated Draft EIR Transportation & Circulation Section 4.13.

Response to Comment A-4-7. The calculations regarding the LOS at the US 101/Los Carneros intersection were reviewed and verified during the preparation of the RDEIR (Please see RDEIR Impact TRAFFIC-1).

Response to Comment A-4-8. The University has updated the transportation study to include the analysis requested by Caltrans. The effects of bicycle and pedestrian travel on study intersections in Isla Vista, which experience the highest level of non-vehicle travel within the study area, were evaluated. Tables 4.13-9 and 4.13-42 in the RD EIR present the findings of this analysis, summarized on pages 4.13-19 and 93.

Response to Comment A-4-9. The discussion of Impact TRAFFIC 8 summarizes project transit ridership with the LRDP based on current mode split data. The RDEIR also includes a mitigation measure (TRAFFIC 8A) that requires the University to work with the Metropolitan Transit District to enhance transit service with the proposed LRDP.

Response to Comment A-4-10. The LRDP relied on the most recent available travel survey data, which was conducted in 2002 for students. More recent data was available for faculty and staff. Because the amount of housing close to campus has increased since 2002, the survey is likely to overestimate the current number of students who commute by car. Updating the analysis, thus, would likely show that the impact would be reduced. In addition, any such an update would not change the conclusions in the EIR.
Response to Comment A-4-11. The standards of significance included in section 4.13.2.1 are from the County and City, including the one percent factor. The required one percent increase beyond a LOS C allows for discounting de minimis increases in traffic. Nevertheless, this is the agency standard.

Response to Comment A-4-12. Comment noted.

Response to Comment A-4-13. The RDEIR uses trip generation rates that determine trips per housing unit or bed. These rates include all trips by all members of households. These rates include trips generated by all campus facilities, such as academic uses, housing, and University-serving dining and retail uses.

The proposed neighborhood serving uses are similar to those already on campus and are intended to reduce auto-trips. Additional amenities on-campus, would allow students, faculty, and staff to travel off-campus less frequently, and are unlikely to draw off-campus residents to make trips to Campus.

“Minor commercial services” attached to recreational and sports facilities are entirely ancillary uses, such as snack bars alongside fields. They are unlikely to generate trips beyond those attributable to the recreational facilities, which are already accounted for in the trip generation rates.

The selected trip generation rates are thus appropriate and provide support for the RDEIR’s conclusions.


Response to Comment A-4-15. The RDEIR provides impact analyses of 46 intersections, 29 roadway segments, and 24 freeway facilities. Mitigation measures were identified where appropriate. A formula for determining the University’s proportional share of mitigation costs attributable to development under the 2010 LRDP is described as part of the mitigation on RDEIR page 4.13-113. (See also Mitigations TRAFFIC-6A(4), TRAFFIC-10A).

Response to Comment A-4-16. As described in Section 4.13.2.2, traffic forecasts for the RDEIR’s analysis included only those roadway improvements that were programmed and funded at the time of analysis. Proposed mitigation measures include other planned regional roadway improvements and commit the University to contribute its fair share of the cost of these improvements.

Response to Comment A-4-17. The no-housing scenario evaluation is provided for comparison purposes only. The LRDP proposes to construct housing for all new students, faculty, and staff. Therefore, under CEQA, quantitative analysis of the no-housing scenario is not required. The recirculated EIR section has, however, analyzed the traffic impacts of a Delayed Housing scenario, under which on-campus housing construction lags enrollment increases by 4 years (p. 4.13-73).

Response to Comment A-4-18. The additional documentation requested is presented in the RDEIR Section 4.13 Transportation and Circulation (Appendix 4.13-3).

Response to Comment A-4-19. Comment noted.

Response to Comment A-4-20. Caltrans supports the concept and goal of trip reduction by enhancing TDM measures. However, as a mitigation measure, this should contain quantifiable implementation tasks, supported by committed resources or incentives, and a measurement of how this increases the existing TDM conditions. Specific measures of effectiveness (MOE) and when and how they are evaluated should be included in addition to a discussion of consequences if the MOE’s are not met and how that will impact LOS.
The effectiveness of TDM measures recommended under the LRDP will be quantified through mitigation monitoring as outlined under LRDP Mitigation TRAFFIC-1A Section 2. The University will quantify the effectiveness of TDM measures through the collection of actual traffic counts at campus gateways.

Response to Comment A-4-21. The mitigation monitoring program is only one of several proposed mitigation measures. The monitoring program will be used to identify the appropriate timing for the implementation of required mitigation measures. Mitigation TRAFFIC-6A(3) specifically requires the University to work with SBCAG and other identified agencies.

Response to Comment A-4-22. Comment noted.

Response to Comment A-4-23. Comment noted.

Response to Comment A-4-24. In response to this comment, the revised mitigation measure in the recirculated Transportation Section no longer includes the eight-lane widening project for US 101.

Response to Comment A-4-25. As the comment notes, the tables on pages 4.13-127 and 4.13-128 of the original DEIR were identical. Table 4.13-47 of the original Transportation Section was repeated. New tables have been correctly placed in the recirculated section. (Please see Table 4.13-50 on page 4.13-109.)

Response to Comment A-4-26. As the Transportation Section explains on page 4.13-64 and in Appendix 4.13-3, the analysis of traffic impacts accounts for campus affiliates by establishing trip generation rates per unit of University housing. The per-unit rate includes all trips by all members of households. The following is an excerpt from page 4.13-63 of the recirculated Transportation and Circulation Section:

> The traffic volumes were averaged over the three-day count period to determine the number of vehicle-trips traveling to/from each complex throughout the day and during the a.m. and p.m. peak hours. Peak hours were determined based on traffic volumes on adjacent streets, rather than peak hours for traffic in and out of the complex. The number of vehicle-trips was then divided by the number of housing units or students (“beds”) within the complex to determine the vehicle-trip rate (“trips per unit” or “trips per bed”). Although the trip rate is expressed on a per bed/unit basis, the rate reflects all vehicles traveling to/from the complexes, such as residents, visitors, delivery trucks, maintenance vehicles, etc.

Response to Comment A-4-27. The additional explanation requested in this comment is presented in the RDEIR Section 4.13 Transportation and Circulation under Trip Generation (page 4.13-63 and in Appendix 4.13-3).

Response to Comment A-4-28. Please see Table 3.0-6 in Section 3.0 of the original DEIR, for a breakdown of the base year (2008), current population (20,000 students), and the proposed increases.

Response to Comment A-4-29. The figures in Table 3.0-4 were derived from an annual single-quarter population (fall). Winter, spring, and summer quarter enrollments are generally lower than fall because enrollment drops off during the school year. As indicated in Table 3.0-6, campus planning relies on a three-quarter average enrollment across fall, winter, and spring.
Chris Clark  
University of California  
641 Higuera Street, Suite 301  
San Luis Obispo, CA 93401  

RE: SCH# 2007051128 UC Santa Barbara Long Range Development Plan; Santa Barbara County.

Dear Mr. Clark:

The Native American Heritage Commission (NAHC) has reviewed the Notice of Completion (NOC) referenced above. The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA Guidelines 15064(b)). To comply with this provision the lead agency is required to assess whether the project will have an adverse impact on historical resources within the area of project effect (APE), and if so to mitigate that effect. To adequately assess and mitigate project-related impacts to archaeological resources, the NAHC recommends the following actions:

✓ Contact the appropriate regional archaeological Information Center for a record search. The record search will determine:
  - If a part or all of the area of project effect (APE) has been previously surveyed for cultural resources.
  - If any known cultural resources have already been recorded on or adjacent to the APE.
  - If the probability is low, moderate, or high that cultural resources are located in the APE.
  - If a survey is required to determine whether previously unrecorded cultural resources are present.

✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
  - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.

✓ Contact the Native American Heritage Commission for:
  - A Sacred Lands File Check. **USGS 7.5 minute quadrangle name, township, range and section required.**
  - A list of appropriate Native American contacts for consultation concerning the project site and to assist in the mitigation measures. **Native American Contacts List attached.**

✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
  - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
  - Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.
  - Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,

Katy Sanchez
Program Analyst

CC: State Clearinghouse
Letter A-5
Kathy Sanchez
Program Analyst
Native American Heritage Commission

March 24, 2008

Response to Comment A-5-1. A records search was completed for the project as part of the cultural resource studies. Please see Appendix 4.4-1, Archaeological Resources Technical Report, p. 14.

Response to Comment A-5-2. Final reports for specific projects will be prepared during project-specific environmental review. Please see Section 1.0, introduction, of the EIR for information regarding tiering of environmental documents.

Response to Comment A-5-3. A request to search the sacred lands inventory was completed as part of the cultural resources studies for the project. Native American representatives were also contacted as part of the studies. Please see Appendix 4.4-1, Archaeological Resources Technical Report, p. 14.

Response to Comment A-5-4. Section 4.4.6.2 of the cultural resources section includes mitigation which addresses previously undiscovered resources.
Review Comments on Drafts Documents:

Long Range Development Plan and Environmental Impact Report

Dave Vandenberg, Laboratory Safety Program Manager

UCSB Environmental Health & Safety
x-4899, David.Vandenberg@ehs.ucsb.edu

Long Range Development Plan

Section G: Utilities and Infrastructure

Pg. G.3: “The campus will maintain and upgrade its resources for chemical spill response...” Comment: I manage the campus hazmat response team within EH&S and upgrades to our resources are needed. However, no one has said anything to us about this issue and we are dubious about real follow-through on providing this.

Environmental Impact Report

4.2: Air Quality

pgs. 4.2-18 and 4.2-21 (Laboratory Emissions)

and

Air Quality Health Risk Assessment, Appendix 4.2.3

- Sec. 6.1.3 (Laboratories)
- Appendix D: Laboratory Source – Laboratory Area

These sections attempt to determine: “... the total square footage of each type of laboratory currently existing at UCSB...” as part of the emissions calculations. It uses a very crude calculation - the number of fume hoods X 20 square feet of lab space per hood. This section is either: a) poorly written and it is actually trying to estimate the total square footage occupied by the hoods themselves, or b.) is a gross underestimation of the lab space on campus. If the latter, to come up with approximately 11,000 sq. ft. of total lab space on the campus is absurd. The number is at least 10X that. There are over 700 labs on campus. The first floor clean room in Engineering Science alone is about 10,000 sq. ft. The problem with your calculation is the 20 sq. ft. lab area per hood - this is a gross underestimation.

I don’t know how this affects the calculation of laboratory emissions, but I assume it would greatly underestimate them. This needs to be corrected.

4.6. Hazards and Hazardous Materials

4.6.1.2 Regulatory Context
Probably, the single most important code in relation to the storage and use of hazardous materials on campus is not included in this section:

California Fire Code (probably. Particularly the following Articles:
  Article 80 (Hazardous Materials)
  Article 51 (Semiconductor Fabrication Facilities)
  Article 74 (Compressed Gases)
  Article 79 (Flammable Liquids)

However, note that recently California adopted the International Fire and Building Codes which provide different versions of the above Articles.

Pg. 4.6-8: the campus Radiation Safety Committee is described, but not the Chemical Safety Committee. The CSC does not issue authorizations, but provides consultation on chemical use issues.

Pg. 4.6-4: Note that the Business Plan thresholds mentioned are per building, not for the whole campus.

Pg. 4.6-7: The paragraph on the MOU makes more sense to be on pg. 4.6-4 under the description of the local CUPA oversight. Also, the language in that paragraph is out of date. It is now the Hazardous Materials Unified Program, not the IIMS. Further, there is no longer a separate Environmental Health Services Division at the County, it has been under the Fire Department for years.

Pg. 4.6-7: Note that the *Hazardous Materials Emergency Response Plan* discussed is a formal part of our Business Plan which is mentioned several pages earlier.

Pg. 4.6-7: In the EOP section, note that EH&S recently distributed to all campus departments for posting in all work areas the *UCSB Emergency Information Flip Chart*. It parallels the info in the Department EOPs and is a key part of campus emergency planning now.

Pg. 4.6-8: Note the Chemical Hygiene Plan is a Cal-OSHA requirement. Therefore, it should rightfully be in the previous “Applicable Regulations” section. Similarly with the Hazard Communication Program. Also, the last two sentences in the hazcom paragraph belong in the waste section, not hazcom.

Pg. 4.6-10: The paragraph on the CUPA oversight is inaccurate and confusing.

Pg. 4.6-11: The last sentence in the first paragraph is in the wrong place. CUPA has nothing to do with Biosafety and autoclaves.

Pg. 4.6.1.9: See comments above about new emergency info flip chart.

Pg. 4.6.21: Quote: “Ventilation systems associated with laboratories are HEPA-filtered to control exposure to the public”. This statement is 100% wrong. First, perhaps 5%
of the labs on campus have any HEPA filters. Second, HEPA filters are for removing particulates like dust/aerosols, not chemical fumes. Third, the filters are not on the exhaust to the “public”, but on the air that comes into the lab, e.g. in a cleanroom, or on air that recirculates to the lab, e.g. a biosafety cabinet.

Pg. 4.6.21: Policy HAZ-4. Over just the past 7 years the number of campus labs has increased about 35%! In that time, and earlier, additional resources have been requested, but none have been given to EH&S for the types of activities in this “policy”. So, we are very dubious of the follow-through on this statement.

Pg. 4.6-22: Quote: “Contractors shall be required to document on-site availability of applicable MSDS sheets….” I don’t much direct knowledge of this, but am pretty sure this is typically not done now. It’s hard to imagine who on campus would be willing and able to oversee this “requirement”.

Pg. 4.6-22: Quote: “…. routine use, storage and disposal of hazardous materials at campus facilities is and would continue to be regularly inspected and closely managed in compliance with the variety of local, state and federal laws which exist.” Well, that sounds great, but the reality is much different. We try to inspect all 700+ campus labs once a year, but can’t even meet that minimal standard with our limited resources. We typically spend about 5 minutes per lab per year, so not exactly “regularly inspected and closely managed”.

Pg. 4.6-23: Fourth paragraph - see comments above. Quote: “Additionally, the EH&S will continue to monitor chemical uses and purchases”. No one, including EH&S, monitors campus chemical purchases.

Pg. 4.6-24: Footnote #39. This link is only to our Environmental Health programs which is just a small subset of “what EH&S does”. Suggest link to our home page: http://ehs.ucsb.edu
Response to Comment A-6-1. Comments noted.

Response to Comment A-6-2. The RDEIR includes updated calculations of laboratory space and potential laboratory emissions. See Appendix 4.2-3 Health Risk Assessment page 6 and Appendix D of same.

Response to Comment A-6-3. Section 4.6.1.2 (p. 4.6-6) of the EIR has been amended to include the following text:

California Fire Code. The California Fire Code, embodied in Title 24 of the California Code of Regulations, addresses the storage and use of hazardous materials in several sections.

Response to Comment A-6-4. Section 4.6.1.2 (p. 4.6-9) of the EIR has been amended to include the following text:

Campus Chemical Safety Committee. The Campus Chemical Safety Committee provides recommendations on the safe use, storage and disposal of chemicals, including through the publication of or contribution to the publication of, various manuals used on campus.

Response to Comment A-6-5. Text on page 4.6-4 of the EIR has been amended as follows:

The most common thresholds that trigger regulation are 500 pounds of solid, 55 gallons of liquid, and 200 cubic feet of compressed gas, based on the presence of individual chemicals per building.

Response to Comment A-6-6. The paragraph in question has been deleted from page 4.6-7 of the EIR. Text on page 4.6-4 has been amended as follows:

These sections of the code are often referred to as the “Business Plan Law”. In cooperation with the CUPA, the University has adopted and implements a Hazardous Materials Business Plan. In the end, all of the University’s hazardous materials programs are overseen by the CUPA because they are responsible for reviewing the University’s plan and for performing site inspections on the campus. The CUPA also inspects the campus, through random “spot checks,” for hazardous material inventories (more information on this below).

Through a Memorandum of Understanding1 (MOU) between UC Santa Barbara and the County of Santa Barbara Environmental Health Services Division, the University joined the Operational Agreement implementing the County’s Integrated Hazardous Materials Management System Hazardous Materials Unified Program. The agreement covers the coordination of hazardous material management efforts in Santa Barbara County by the Environmental Health Services Division and the Agricultural Commissioner’s Office of the Department of Agricultural and Environmental Management; County, City, and Special District Fire Agencies; and County Office of Emergency Services. The MOU outlines the process by which inspections, inventory updates, Emergency Response Plan revisions, and enforcement are to occur as a result of the University entering into this agreement.

Response to Comment A-6-7. The text on page 4.6-7 of the EIR has been amended as follows:

EH&S is responsible for managing the Emergency Response Team along with the Santa Barbara County Fire Department, and has issued a Hazardous Materials Emergency Response Plan as part of its Business Plan to provide procedures for the Team to follow in response to hazardous materials incidents. The plan was submitted to the CUPA for oversight, approval and inclusion into the Santa Barbara County Hazardous Materials Emergency Response Area Plan, in accordance with the Business Plan law. Any incident is reported to the CUPA for appropriate follow-up.

Response to Comment A-6-8. Text on page 4.6-7 has been amended as follows:

In conjunction with the EOP, there are Department EOPs which outline more specific procedures for individual departments to follow in order for them to be able to handle a rapidly escalating emergency such as a toxic spill, bomb threat, or fire. EH&S recently distributed to all campus departments for posting in all work areas the UCSB Emergency Information Flip Chart. These charts parallel the information in the Department EOPs.

Response to Comment A-6-9. The paragraphs regarding the Chemical Hygiene Plan and Hazard Communication Program have been deleted from page 4.6-8. The text on page 4.6-2 has been amended following the paragraph describing OSHA to include the two paragraphs that follow:

Chemical Hygiene Plan. All Campus laboratories are required to implement a Chemical Hygiene Plan which outlines procedures to properly manage and dispose of hazardous chemicals. EH&S provides a template Chemical Hygiene Plan that each campus laboratory must use to develop its own, laboratory-specific guidelines. New laboratories constructed at the University are required to implement a Chemical Hygiene Plan.

Hazard Communication Program. As required by California Code of Regulations, Title 8, General Industry Safety Order 5194, UC Santa Barbara’s Hazard Communication (HAZCOM) Program is actively implemented throughout campus in order to ensure the health and safety of all University employees working with or around chemical substances. Under the HAZCOM program the University is required to identify all hazardous materials used in each work area by inventorying these materials, labeling all hazardous materials with product name and appropriate hazard warnings, compiling Material Safety Data Sheets (MSDSs) and making the MSDSs available, training all employees about specific hazards of all hazardous materials in their workplace, and providing and maintaining appropriate personal protective equipment as required. A hazardous waste program is maintained by the University so that all hazardous waste is collected, stored, and disposed in accordance with federal, state, and local regulations. The hazardous waste program coordinates hazardous material pickups and laboratory clean-out procedures.

Response to Comment A-6-10. Comment noted.

Response to Comment A-6-11. No changes are proposed.

Response to Comment A-6-12. The following text has been added following the bulleted list on page 4.6-19 of the EIR:

In addition to the above, EH&S has recently distributed to all campus departments for posting in all work areas the UCSB Emergency Information Flip Chart. The Flip Chart parallels the information contained in the various departmental EOPs and is a key part of current campus emergency planning.

Response to Comment A-6-13. The text on page 4.6-21 of the EIR has been amended as follows:
Ventilation systems associated with certain campus laboratories are HEPA filtered to control exposure to the public users and to maintain appropriate research environments.

Response to Comment A-6-14. Comment noted.

Response to Comment A-6-15. No changes are proposed. Contractors will be able to fulfill this requirement by documenting MSDS availability through completion of a simple environmental compliance checklist. Contractors must comply with current requirements regarding the use, storage, and disposal of hazardous materials (according to Mitigation HAZ-2A). Oversight of such measures will be implemented by the University as a part of individual project permitting.

Response to Comment A-6-16. Comment noted.

Response to Comment A-6-17. The sentence on page 4.6-23 of the EIR has been deleted. The paragraph will appear as follows:

Pursuant to Policy HAZ-4 of the proposed LRDP (reproduced under Impact HAZ-1, above), waste minimization efforts by EH&S would be strengthened. This policy will require paying special attention to monitoring hazardous materials storage and handling procedures, onsite and offsite recycling, attaining source reduction goals, and informational and educational programs (largely the responsibility of EH&S). Additionally, the EH&S will continue to monitor chemical uses and purchases.

Response to Comment A-6-18. Comment noted.
June 20, 2008

Alissa Hummer
Senior Planner
University of California, Santa Barbara
Office of Campus Planning and Design
Santa Barbara, CA 93106-1030


Dear Alissa,

The Santa Barbara County Air Pollution Control District (APCD) appreciates the opportunity to comment on the Draft EIR for the LRDP. In general, the APCD concurs with the conclusions and the mitigation measures listed in the DEIR. Please note the specific comments below:

1. The DEIR states, and the APCD concurs, under Impact AIR-1 that air quality impacts from traffic generated by the 2008 LRDP will be significant and unavoidable. Traffic mitigation includes a goal of reducing single occupant vehicle traffic to and from UCSB by 10% as measured against anticipated LOS levels. The LRDP, Context, Page B-21 states, “Over 500 faculty and staff who participated in the Transportation Alternative Program (TAP) used the complimentary bus pass program at least once a month”. However, the TAP website shows that bus passes are discounted not “complimentary.” Also, discounted unlimited 30-day MTD bus passes are available only to Faculty, Staff, and Post-Docs who primarily use alternative transportation, do not own a parking permit, are employed at least 35%, and sign up for payroll deduction. The Transportation Alternatives Program shares the cost of these passes which may cost up to $20 per month for a qualified adult. Student bus passes are paid for by the students through student fees. The APCD recommends that UCSB consider providing a higher subsidy or free bus passes through the LRDP planning horizon.

2. The APCD is concerned about the impact of diesel construction equipment exhaust and fugitive dust on the sensitive members of UCSB’s population. All portable diesel-fueled engines shall be certified to meet the most stringent of the federal or California emission standards for newly manufactured non-road engines pursuant to 40 CFR Part 89 or Title 13 of the California Code of Regulations (that is, certified to Tier 1, 2, 3 or 4 non-road engine standards). Tier 1, 2, 3, and 4 refer to non-road engine emission standards promulgated by ARB and U.S. EPA for newly manufactured engines pursuant to 40 CFR Part 89 or Title 13 of the California Code of Regulation. Each successive Tier represents more stringent emission standards and the requirements are phased-in over time (see http://www.arb.ca.gov/diesel/verdev/verdev.htm). Please note in the LRDP

Please include the following additional mitigations:

3. All portable diesel-fired engines rated at 50 brake- horsepower or greater must have either statewide Portable Equipment Registration Program (PERP) certificates or APCD permits prior to operation. Engines with PERP certificates are exempt from APCD permit, provided they will be on-site for less than 12 months.

4. **Idling Restrictions**: These measures are applicable to construction as well as operation of the campus. In order to reduce diesel emissions and the associated health risk from heavy duty diesel vehicles, California’s more recent anti-idling regulations (with some exemptions) require that drivers of diesel-fueled vehicles:
   a. shall not idle the vehicle’s primary diesel engine for greater than 5 minutes at any location,
   b. shall not use diesel-fueled auxiliary power units for more than 5 minutes to power a heater, air conditioner, or any ancillary equipment on the vehicle equipped with a sleeper berth, at any location.

UCSB may place additional requirements on heavy duty diesel delivery and haul trucks, and create “no idle” zones at locations where there is a potential for significant health risk.

Please contact Vijaya Jammalamadaka at 961-8893 or vlj@sbcapcd.org, if you have questions.

Sincerely,

Bobbie Bratz
Public Information and Community Programs Supervisor

cc: TEA Chron File
Letter A-7
Bobby Bratz
Public Information & Community Program Supervisor
Santa Barbara County Air Pollution Control District

June 20, 2008

Response to Comment A-7-1. The language on page B-21 of the LRDP has been amended as follows:

Over 500 faculty and staff who participated in the Transportation Alternative Program (TAP) used the complimentary subsidized bus pass program at least once a month.

The APCD recommendation to provide a higher subsidy or free bus passes is noted.

Response to Comment A-7-2 to A-7-4. Mitigation measure AIR-3A (p. 4.2-29) has been amended as follows:

Equipment

1. Contractors shall utilize only heavy duty diesel powered construction equipment manufactured after 1996 (with federally mandated “clean” diesel engines) ensure that all portable diesel-fueled engines are certified to meet the most stringent of the federal or California emission standards for newly manufactured non-road engines pursuant to 40 CFR Part 89 or Title 13 of the California Code of Regulations (to Tier 1, 2, 3 or 4 non-road engine standards). All equipment shall be properly tuned and maintained as evidenced by maintenance logs.

2. All portable diesel-fired engines used in construction and/or campus operations rated at 50 brake-horsepower or greater must have either statewide Portable Equipment Registration Program (PERP) certificates of APCD permits prior to operation. Engines with PERP certificates are exempt from APCD permit, provided they will be on-site for less than 12 months.

3. All drivers of diesel-fueled vehicles involved in construction under the LRDP and the operation of the Campus shall comply with California’s more recent anti-idling regulations, which generally require that drivers of diesel-fueled vehicles:

   a. Shall not idle the vehicle’s primary diesel engine for greater than 5 minutes at any location.

   b. Shall not use diesel-fueled auxiliary power units for more than 5 minutes to power a heater, air conditioner, or any ancillary equipment on the vehicle equipped with a sleeper berth, at any location.
June 20, 2008

Alissa Hummer, Senior Planner
Campus Planning and Design
Facilities Management
c/o Vision 2025
UC Santa Barbara, CA 93106-1030

Dear Ms. Hummer:

The following are comments from SBCAG for the UCSB Long Range Development Plan and EIR.

**EIR Comments:**

It would be helpful to have a comprehensive Table of Contents at the beginning of the EIR.

Page 4.13-25

Coastal Express - Operated by Ventura (typo has an e at the end) Intercity Transit Service Authority (VISTA) provides four daily weekday transit trips to UC Santa Barbara from Oxnard, Ventura, and travels through Carpinteria, Santa Barbara and Goleta. (Also note, there is a misspelling under Coastal Express—Carpentaria should be Carpinteria).

Table 4.13-13
It would be beneficial to see the information in this table (Main Campus Peak Hour Parking Utilization by Permit Type) examined spatially.

Page 4.13-27 last sentence in the first paragraph make the following addition:

In Addition, UC Santa Barbara would continue to work with SBMTD, VISTA and the Clean Air Express to provide bus service to the campus.

On page 4.13-42 consider the following enhancements to the Transportation System Management programs:

Current TAP program is funded through parking fines and forfeitures. This creates a zero sum game. By decreasing Single Occupant Vehicles on campus,
fewer parking fees and fines are assessed thereby reducing the available funding for the TAP program. Instead consider an alternate funding source such as an annual floor area TAP fee or residential unit TAP fee for any new development on campus to insure not only the continuation of the existing TAP program, but to generate additional revenue to enhance the program to mitigate the traffic and parking impacts that result from the new campus development. This would be supportive of the UCSB Sustainability Goals and the EIR goal of reducing SOV trips by 10%. It is also consistent with the City of Goleta goals to encourage alternative transportation particularly at larger-scale employment sites (Policy TE2: Transportation Demand Management).

Population and Housing Comments:

Table 4.10-6, Page 4.10-6
The population of Santa Barbara City based on the 2000 Census is 89,600 not 92,325. In the 2000 Census there were 2,725 group quarters (dormitory residents) misallocated from Isla Vista to the Santa Barbara airport. Subsequently the Census Bureau revised the population estimates. The Isla Vista year 2000 population was 21,069 not 18,344 as stated in the table. The 1990 to 2000 annual growth should also be revised.

Table 4.10-7, Page 4.10-7
The table references Santa Barbara city population forecast from the SBCAG RGF 2007 but mistakenly provides the unincorporated south coast population forecast in its place.

Page 4.10-8, 5th paragraph
The Regional Growth Forecast does not account for the LRDP population growth because the SBCAG forecast only accounts for plans and programs that have completed the review process and are approved. These plans are accounted for in Table 3 Appendix 5 of the Regional Growth Forecast where the UCSB Long Range Development Plan is cited.

Table 4.10-14, Page 4.10-13
The SBCAG household forecast reference is based on the previous RGF 2000 adopted in March of 2002. Table 13, Appendix 5, Page 31 should also be updated to reflect the more recent growth forecast adopted in August of 2007.

Table 4.10-15, Page 4.10-13
This table should be revised to reflect growth rated based on updated data for housing and the corrected City of Santa Barbara reference.

Page 4.10-16, 2nd paragraph
SBCAG is not the necessarily the regional planning agency for population and housing. Better stated:

SBCAG is the regional agency that is given the responsibility by the State of California to allocate the Regional Housing Needs. SBCAG also develops population, housing and employment forecasts for use in long range transportation planning and other long range planning activities by local jurisdictions.

Page 4.10-17
The reference is to the prior RHNA. The draft RHNA currently under preparation is available and allocated 11,600 units countywide.

Page 4.10-18, Paragraph 1
This discussion should include an evaluation of how new on campus housing development since January of 2007 relates to the current Regional Housing Needs Allocation cycle.

Page 4.10-27, last paragraph
The SBCAG Forecast predicts the county residential land use capacity at 6,335 not 8,200. Refer to Page 10 Appendix 5, Table 6.

Airport Land Use Comments:

Table 2. HAZ-5
The entire study area is within the Airport Influence Area of Santa Barbara Municipal Airport, not “parts of the Study area” within the boundary of Santa Barbara County Airport Land Use Plan.

Page 4.6.1.6
Figure 4.6.1. It is unclear that the Clear and Approach Zone boundary on the exhibit reflects the extended runway safety area (RSA) configuration on Runway 7. The construction of the 800-foot RSA extension on Runway 7 was completed in April 2008. The analysis should discuss the possible impacts under this new approach and clear zone configuration.

If you have any questions or clarifications related to these comments please call me or Brian Bresolin, of my staff.

Sincerely,

Michael Powers
SBCAG
Deputy Director, Planning
Letter A-8
Michael Powers
Deputy Director, Planning
Santa Barbara County Association of Governments

June 20, 2008

Response to Comment A-8-1. Comment noted. A comprehensive table of contents was prepared for the beginning of each topical section. This facilitated easier use of this large document, and made for easier use of the document electronically, both on the cd and on the internet.

Response to Comment A-8-2. Text on page 4.13-28 of the RDEIR has been amended as follows:

Coastal Express – Operated by Ventura Intercity Transit Service Authority (VISTA) provides once-a-day commuter service four daily weekday transit trips to UC Santa Barbara from Oxnard, Ventura, and travels through Carpinteria, Santa Barbara and Goleta.

Response to Comment A-8-3. Table 4.13-13 summarizes parking data by permit type. The previous table (4.13-12) includes parking data for each lot/structure on campus to determine occupancy trends within various areas of the campus.

Response to Comment A-8-4. Text on page 4.13-30 of the RDEIR has been amended as follows:

In addition, UC Santa Barbara would continue to work with SBMTD, VISTA and the Clean Air Express to provide bus service to the campus.

Response to Comment A-8-5. The suggested alternative method of raising funds for the TAP program is noted.

Response to Comment A-8-6. Table 4.10-6 in the EIR has been revised as follows:

<table>
<thead>
<tr>
<th>City/County</th>
<th>1990</th>
<th>2000</th>
<th>2005</th>
<th>Population 2006(1)</th>
<th>2000-2006(1) Average Annual Growth</th>
</tr>
</thead>
<tbody>
<tr>
<td>City of Goleta(1)</td>
<td>85,571</td>
<td>92,325 (89,600)</td>
<td>90,238</td>
<td>30,290 (30,400)</td>
<td>(0.9)% (0.2)% (0.5)%</td>
</tr>
<tr>
<td>City of Santa Barbara</td>
<td>(18,344) (21,069)</td>
<td>NA</td>
<td>(1.1)% (0.3)%</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Santa Barbara County</td>
<td>369,608</td>
<td>399,347</td>
<td>417,988</td>
<td>(424,625) (428,655)</td>
<td>(0.9)%</td>
</tr>
</tbody>
</table>

Notes:
NA = data Not Available
1. Incorporated 2002.
3. 2005-2006\(1\) growth only
The paragraph following Table 4.10-6 (p. 4.10-7) has been revised as follows:

Based on the information presented in Table 4.10-6, the populations in the communities of Goleta, Santa Barbara and Isla Vista have been largely unchanged or declined slightly in recent years. These communities are either largely built out, as is the case in Isla Vista, or have other constraints on growth such as Coastal Zone regulations, limited resources, high real estate costs, and high housing construction costs. Between the years 2006 and 2007 and 2008, many of the cities in the County saw a growth of between 0.1 and 0.2, 1.0 and 2.5 percent (including the City of Goleta). The City of Santa Barbara had higher experienced growth at 0.4 to 1.2%, while the County’s growth was limited (approximately 1%). Growth in recent years is assumed to have occurred mostly in the northern parts of the County, in locations such as the City of Santa Maria (0.6 to 1.2%), Lompoc (0.7 to 2.4%) and Buellton (3.2%).

Response to Comment A-8-7. The table has been corrected as follows:

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>2005</th>
<th>2010</th>
<th>2015</th>
<th>2020</th>
<th>2025</th>
<th>2030</th>
<th>2035</th>
<th>2040</th>
<th>Annual Average Rate of Growth</th>
</tr>
</thead>
<tbody>
<tr>
<td>County Total¹</td>
<td>417,500</td>
<td>430,200</td>
<td>444,900</td>
<td>459,600</td>
<td>473,400</td>
<td>481,400</td>
<td>487,000</td>
<td>492,800</td>
<td>0.47%</td>
</tr>
<tr>
<td>County Unincorporated</td>
<td>135,900</td>
<td>138,300</td>
<td>140,700</td>
<td>143,000</td>
<td>144,900</td>
<td>146,800</td>
<td>148,900</td>
<td>151,200</td>
<td>0.30%</td>
</tr>
<tr>
<td>South Coast Subregion</td>
<td>204,700</td>
<td>205,800</td>
<td>208,500</td>
<td>211,300</td>
<td>213,600</td>
<td>215,700</td>
<td>216,300</td>
<td>216,900</td>
<td>0.17%</td>
</tr>
<tr>
<td>Goleta</td>
<td>31,000</td>
<td>31,700</td>
<td>33,100</td>
<td>34,500</td>
<td>35,900</td>
<td>37,300</td>
<td>37,300</td>
<td>37,300</td>
<td>0.53%</td>
</tr>
<tr>
<td>Santa Barbara Unincorporated</td>
<td>64,400</td>
<td>64,600</td>
<td>64,800</td>
<td>65,000</td>
<td>65,200</td>
<td>65,400</td>
<td>65,500</td>
<td>65,800</td>
<td>0.10%</td>
</tr>
<tr>
<td>Santa Barbara (City)</td>
<td>89,800</td>
<td>90,000</td>
<td>91,000</td>
<td>92,000</td>
<td>92,400</td>
<td>92,800</td>
<td>92,800</td>
<td>93,000</td>
<td>0.10%</td>
</tr>
</tbody>
</table>

Notes:
1. The Department of Finance projections for the county are inconsistent with the projections provided by SBCAG (approximately 440,000 for 2010, 460,000 for 2020 and 465,000 for 2030).
2. The South Coast Subregion includes unincorporated areas of Santa Barbara County, unincorporated areas of Carpinteria Valley, and the cities of Goleta, Santa Barbara, and Carpinteria.

Response to Comment A-8-8. Comment noted.

Response to Comment A-8-9. The table has been updated as follows:
Table 4.10-174.
SBCAG Regional Housing Projections 2000-2040

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>2000</th>
<th>2005</th>
<th>2010</th>
<th>2015</th>
<th>2020</th>
<th>2025</th>
<th>2030</th>
<th>2040</th>
<th>Annual Average Rate of Growth (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>County Total</td>
<td>136,622</td>
<td>146,663</td>
<td>154,053</td>
<td>160,724</td>
<td>164,641</td>
<td>165,694</td>
<td>166,671</td>
<td>167,542</td>
<td>0.7</td>
</tr>
<tr>
<td></td>
<td>143,138</td>
<td>147,961</td>
<td>152,849</td>
<td>157,648</td>
<td>161,981</td>
<td>164,422</td>
<td>165,970</td>
<td></td>
<td>0.5</td>
</tr>
<tr>
<td>County - Unincorporated</td>
<td>46,396</td>
<td>47,255</td>
<td>48,103</td>
<td>48,861</td>
<td>49,527</td>
<td>50,201</td>
<td>50,910</td>
<td>51,660</td>
<td>0.3</td>
</tr>
<tr>
<td>South Coast Subregion</td>
<td>73,665</td>
<td>75,624</td>
<td>77,529</td>
<td>79,429</td>
<td>80,969</td>
<td>81,429</td>
<td>81,890</td>
<td>80,959</td>
<td>0.4</td>
</tr>
<tr>
<td></td>
<td>75,449</td>
<td>76,611</td>
<td>77,845</td>
<td>79,079</td>
<td>79,940</td>
<td>80,620</td>
<td>80,799</td>
<td></td>
<td>0.2</td>
</tr>
<tr>
<td>City of Goleta</td>
<td>9,780</td>
<td>11,615*</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>15,405*</td>
<td>13,943</td>
<td>0.9*</td>
</tr>
<tr>
<td></td>
<td>11,353</td>
<td>11,844</td>
<td>12,364</td>
<td>12,884</td>
<td>13,404</td>
<td>13,924</td>
<td>13,943</td>
<td></td>
<td>0.6</td>
</tr>
<tr>
<td>Santa Barbara Unincorporated</td>
<td>22,456</td>
<td>22,273</td>
<td>22,820</td>
<td>22,257</td>
<td>25,346</td>
<td>25,346</td>
<td>21,594</td>
<td></td>
<td>0.8**</td>
</tr>
<tr>
<td></td>
<td>21,139</td>
<td>21,204</td>
<td>21,269</td>
<td>21,334</td>
<td>21,399</td>
<td>21,464</td>
<td>21,529</td>
<td></td>
<td>0.1</td>
</tr>
<tr>
<td>City of Santa Barbara</td>
<td>35,605</td>
<td>36,914</td>
<td>36,223</td>
<td>36,532</td>
<td>36,840</td>
<td>37,148</td>
<td>37,452</td>
<td>37,738</td>
<td>0.2</td>
</tr>
<tr>
<td></td>
<td>35,931</td>
<td>36,449</td>
<td>37,003</td>
<td>37,557</td>
<td>37,738</td>
<td>37,738</td>
<td>37,738</td>
<td></td>
<td>0.3**</td>
</tr>
</tbody>
</table>

Source: SBCAG Forecast 2000-2050-2040, unless otherwise noted.
* From Goleta General Plan EIR (page 2-4)
** Calculated over 20 years

Note: The South Coast Subregion includes unincorporated areas of Santa Barbara County, unincorporated areas of Carpinteria Valley, and the cities of Goleta, Santa Barbara, and Carpinteria.

The paragraph following Table 4.10-14 (p. 4.10-15) has been revised as follows:

The City of Santa Barbara is expected to have an almost negligible rate of growth in housing, reflecting the relatively built-out nature of the City. Other communities will likewise experience moderate limited growth (slightly less than 1% per year). The Regional Growth Forecast states that most communities in the County will reach buildout by 2030, if not sooner. The Regional Growth Forecast identifies growth management ordinances and coastal zone regulation as constraints on new residential development in the area.

Response to Comment A-8-10. The table has been corrected as follows:
<table>
<thead>
<tr>
<th></th>
<th>of Growth in Housing</th>
<th>of Growth in Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>County Total</td>
<td>0.7</td>
<td>0.9</td>
</tr>
<tr>
<td></td>
<td>0.45</td>
<td>0.47</td>
</tr>
<tr>
<td>County Unincorporated</td>
<td>0.31</td>
<td>0.30</td>
</tr>
<tr>
<td>South Coast Sub region</td>
<td>0.4</td>
<td>0.6</td>
</tr>
<tr>
<td></td>
<td>0.20</td>
<td>0.17</td>
</tr>
<tr>
<td>City of Goleta</td>
<td>0.5</td>
<td>0.3</td>
</tr>
<tr>
<td></td>
<td>0.59</td>
<td>0.53</td>
</tr>
<tr>
<td>Santa Barbara Unincorporated</td>
<td>0.8</td>
<td>0.2</td>
</tr>
<tr>
<td></td>
<td>0.06</td>
<td>0.10</td>
</tr>
<tr>
<td>City of Santa Barbara*</td>
<td>0.2</td>
<td>0.4</td>
</tr>
<tr>
<td></td>
<td>0.25</td>
<td>0.14</td>
</tr>
</tbody>
</table>

* For period 2005-2025

The paragraph following Table 4.10-15 (p. 4.10-15) has been revised as follows:

Based on the table above, it can be inferred that the City of Santa Barbara (as well as the South Coast Subregion and County as a whole) foresee growth in population which outpaces relatively in line with the creation of new housing units. This may indicate future concerns with increasing household occupancy, among other consequences of a constrained housing supply. Both the City of Goleta and unincorporated areas of Santa Barbara anticipate a housing supply that increases at a faster rate than population growth, which may indicate a trend of easing housing pressures in these areas in the future.

Response to Comment A-8-11. The text has been amended as follows (EIR p. 4.10-16):

**Santa Barbara County Association of Governments (SBCAG).** The Santa Barbara County Association of Governments (SBCAG) is the regional planning agency for population and housing. SBCAG develops the regional agency that is given the responsibility by the State of California to allocate the Regional Housing Needs. SBCAG also develops population, housing and employment forecasts for use in long range transportation planning and other long range planning activities by local jurisdictions, including the Regional Housing Needs Assessment (RHNA) and the Regional Growth Forecast.

Response to Comment A-8-12. The paragraph following EIR Table 4.10-17 (p. 4.10-18) has been revised as follows:

A draft RHNA is currently being prepared which increases the allocation countywide to 11,600 units.

Response to Comment A-8-13. Proposed University housing may be included in housing needs analyses as local government and SBGAG may desire. Some other jurisdictions categorize University housing stock as “group quarters.” University housing is apportioned to particular local government jurisdictions based on the determination of the regional governmental bodies.

Response to Comment A-8-14. The text has been amended as follows:

The SBCAG 2005-2040 Regional Growth Forecast predicts the County’s residential land use availability in 2040 will be 8,206,335 units, with most availability in the unincorporated areas.

Response to Comment A-8-15. Impact HAZ-5 has been amended as follows:

LRDP Impact HAZ-5: *The study area is within the boundary of the Santa Barbara County Airport Land Use Plan. Implementation of the*
LRDP would not result in a safety hazard for people residing or working within these parts of the project area.

Response to Comment A-8-16. The analysis and exhibits reflect the new runway safety area.
16 June 2008

Alissa Hummer
Campus Planning and Design
Facilities Management
c/o Vision 2025
UC Santa Barbara, CA 93106-1030

RE: Environmental Impact Report Long Range Development Plan

While it is not clear in the Draft Environmental Impact Report, (DEIR), we now understand that the University considers the District to be a responsible agency. In order to meet the requirements to respond as a responsible agency, and to adequately address water supply matters, we will need a 30 day extension of time to make comments on the DEIR. We are providing initial comments as follows, and we will be making more detailed comments at a later time.

The Goleta Water District has reviewed Chapter 4.14 and Appendix 4.14-1 of the DEIR for the 2008 Long Range Development Plan. We note that you relied on our 2005 Urban Water Management Plan (UWMP) for much of your information.

We would like to advise you that a Water Supply Assessment (WSA) has been prepared for the City of Goleta. This WSA updated the information in our 2005 UWMP, including the SAFE ordinance as it relates to the drought buffer, and groundwater pumping. A copy has been sent to the University under separate cover. You should use this revised information to prepare your final EIR.

The DEIR treats Water Limitation Permit Numbers 14 and 16 as if they were guaranteed water amounts. Water Limitation permit numbers 14 and 16 were a function of Ordinance 72-2 (and amendments) - "Prohibitions and Restrictions on New Water Service..."
Connections”. That Ordinance basically established a moratorium on new additional, further, expanded or increased in size water connections. Ordinance 72-2 (A-5) was rescinded by Ordinance 96-4. Properties are now subject to the current rules and regulations for new additional, further, expanded or increased in size water connections. In the case of the University, we also have an agreement with you entitled “Water Reclamation Agreement”, dated 1 August 1991. If you have a different analysis, the District would like you to share that with us as soon as possible.

The DEIR develops the concept that the University has a limited amount of water available to them from the Goleta Water District. This concept is valid. However, the limitation is not through the Water Limitation permits, but through our contract with you. The existing contract specifies that the District will deliver to the University up to 944.5 acre feet per year of potable water. Our view is that if you exceed this amount it will be necessary for you to obtain any needed additional supplies from another source. The DEIR discusses this concept under “Measures to Reduce the Projected Water Deficit”, page 4.14-26.

With regard to “Measures to Reduce the Projected Water Deficit”, page 4.14-26, please note that if the University purchases an unused allotment of SWP water, it will also be necessary to obtain capacity in the CCWA pipeline to Lake Cachuma. In order to have that water delivered from Lake Cachuma to the University, a “wheeling” agreement with the Goleta Water District will need to be entered into. Such an agreement would provide that there be no District liability for shortages in SWP water deliveries.

The environmental documents should describe more than one alternative to reduce the projected deficit. The DEIR describes an alternative where the University purchases an unused allotment of SWP water from someone other than the Goleta Water District, as described above, and wheel it through District facilities. Other alternatives would be for the District to obtain the additional SWP water itself, or for the University to obtain it and dedicate it to the District in exchange for District water service for that amount. Another alternative would be for the additional water that is not SWP water, as described below. These alternatives should be kept open at this point. This issue is probably as much contractually related as it is environmental impact related. We will follow up with another letter focused on our mutual contractual relationship.

You should expand the “Measures to Reduce the Projected Water Deficit” section, (and other areas where appropriate), to include a discussion on the expansion of the recycled water project to serve irrigated agriculture so that potable water could be freed up to meet the LRDP demand. With an upgrade in treatment to provide for demineralization to reduce the Total Dissolved Solids (TDS) by about half, and an extension(s) of the distribution system, the recycled water market could be expanded to other (non-UCSB) users, such as the Patterson Avenue area flower growers, that are currently using potable water.
Under Effect and Feasibility of Mitigation, page 30, first paragraph, the following comment is made: "The most likely source of additional water is the State Water Project...". We suggest that the University, (perhaps in concert with its own renowned Bren School), develop a recycled water alternative to purchasing additional State Water.

Table 4.14.17 is incorrect. Reductions in SWP deliveries are not based on average annual deliveries, but on our full Table amount, which is 7,450 acre-feet.

When you have prepared your revised documents, we suggest that you provide them to us to review them for accuracy prior to publishing.

Please contact us if you require further clarification or assistance.

John P. Cunningham
President

Copies:

Donna Carpenter, Vice Chancellor
Marc Fisher, Associate Vice Chancellor
Tye Simpson, Director of Campus Planning and Design
Letter A-9
John F. Cunningham, President
Goleta Water District

June 16, 2008

Response to Comment A-9-1. Please see Master Response - Water Supply section I.

Response to Comment A-9-2. Please see Master Response - Water Supply section V.D.

Response to Comment A-9-3. The RDEIR assumes that the University will be treated similarly to other District customers with respect to any requests for new water service that would require supplies beyond contracted amounts, and that, if GWD has water supplies for such new requests, then it will, pursuant to its public service obligations and consistent with SAFE, grant such requests.

Response to Comment A-9-4. The capacity of infrastructure to convey additional water from the State Water Project is discussed in the RDEIR. RDEIR, p. 4.14-46 to -47. See also Master Response - Water Supply section VI.B.

Response to Comment A-9-5. Mitigation Measure W-3F does not limit the University to acquiring SWP water; if this measure is implemented, the University will consider other sources as appropriate. Expanded recycled water use is a key aspect of the RDEIR’s analysis.

Response to Comment A-9-6. The RDEIR includes a discussion of expansion of the recycled water system on pages 4.14-39 to -44. The RDEIR analyzes the use of additional supplies from the SWP if recycled water supplies fall short of projections. RDEIR, pp. 4.14-44 to -49. For further discussion of the future recycled water demand, please see Master Response – Water Supply section V.A.

Response to Comment A-9-7. The RDEIR contains a revised calculation of year 2025 and 2030 water supply and demand in critical dry years (Table 4.14-12) and Multiple Dry Years (Table 4.14-13), using the SWP deliveries projected in the 2008 WSA. Please see Master Response - Water Supply sections II and IV.B.
City of Santa Barbara
California

PLANNING COMMISSION
STAFF REPORT

REPORT DATE: June 10, 2008
AGENDA DATE: June 19, 2008
TO: Planning Commission
FROM: Planning Staff

SUBJECT: DRAFT COMMENT LETTER - UCSB 2008 LONG RANGE DEVELOPMENT PLAN AND DRAFT ENVIRONMENTAL IMPACT REPORT

In March 2008, the University of California, Santa Barbara (UCSB) released a Draft 2008 Long Range Development Plan (LRDP) and associated Draft Environmental Impact Report (DEIR). Both documents can be viewed in their entirety at www.ucsbvision2025.com. Summaries of the 2008 LRDP and DEIR are included as Exhibits A and B respectively. The public and local jurisdictions have until June 23, 2008 to comment on these documents. Exhibit C is a draft comment letter to UCSB on the 2008 LRDP and DEIR. This letter discusses several areas of concern for the City, including enrollment, housing, traffic, open space and biological resources, water supply, noise, and land use compatibility with the Santa Barbara Airport.

Background

In 1980, a Long Range Development Plan was prepared for UCSB and certified by the California Coastal Commission. The 1980 plan provided for development on campus to increase enrollment at the University to 14,500 students with related staff and faculty. Subsequently, UCSB prepared a new LRDP in 1990 that was certified by the Commission that guided the physical development of the campus through the academic year 2005/2006. The 1990 LRDP projected that the on-campus student population would increase to 20,000 and that the faculty and staff population would increase to 4,473 by 2005-2006. Through the years, the City has collaborated with UCSB on the development and implementation of the 1990 LRDP through participation in the LRDP Implementation Advisory Committee. In 1991, the City of Santa Barbara, County of Santa Barbara, Citizens for Goleta Valley, Citizens Planning Association, and the Isla Vista Association signed two cooperative relations agreements with the University that addressed phasing of student housing, affordable faculty and staff housing, limits on enrollment, traffic improvements, and implementation of a mitigation monitoring program for the 1990 LRDP.

The submitted Draft 2008 LRDP would update the 1990 LRDP and serve as a “general plan” to guide land use and physical improvements to accommodate growth at the University through the year 2025. It is the intention of the University to forward this new document to the California
Coastal Commission for review and approval to satisfy the requirements of the California Coastal Act of 1976. As outlined in Exhibit A, the 2008 LRDP provides for an increase in enrollment of 5,000 students, totaling 25,000 students, by 2025. During that same time frame, 1,736 additional faculty and staff would be hired for a total of 6,431 faculty and staff on campus. The 2008 LRDP also includes construction of an additional 2.5 million gross square feet of academic, research, and support facilities on campus. The University is also proposing the addition of 5,443 bed spaces and 239 student family units on campus to house enrolled students. An additional 1,874 additional faculty and staff on-campus housing units are also proposed. Finally, the 2008 LRDP would modify various land use and resource policies previously included in the 1990 LRDP and subsequent amendments.

RECOMMENDATION

Staff recommends that the Planning Commission provide input on the draft comment letter to UCSB regarding the Draft 2008 LRDP and associated Draft EIR.

Exhibits:

A. Table Summarizing the UCSB 2008 Long Range Development Plan
B. UCSB Long Range Development Plan Draft EIR Executive Summary
C. Draft Comment Letter to UCSB from City of Santa Barbara (June 10, 2008)
June 23, 2008

Alissa Hummer
UCSB Campus Planning and Design
Santa Barbara, CA 93106-1030

RE: Draft EIR for the University of California, Santa Barbara’s Long Range Development Plan 2008 Update

Dear Ms. Hummer,

The City of Santa Barbara Planning Commission and Staff have reviewed the 2008 UCSB Long Range Development Plan (LRDP) and associated Draft Environmental Impact Report (DEIR) dated March 2008 and have the following comments for your consideration.

It is our understanding that UCSB (the University) is proposing to update its 1990 LRDP. The new 2008 LRDP would serve as a “general plan” for the campus, guiding land use and physical improvements to accommodate growth through the year 2025. It is also our understanding that the University intends to forward this new document to the California Coastal Commission for review and approval to satisfy the requirements of the California Coastal Act of 1976. The 2008 LRDP would, therefore, serve as the standard of review for future Notices of Impending Development issued by the University and reviewed by the Coastal Commission.

The 2008 LRDP proposes to increase enrollment at the University from 20,000 students to 25,000 students at an approximate rate of 1% a year until 2025. In this time frame, the University is planning to hire 336 additional faculty and 1,400 additional staff for a total of 1,400 faculty and 5,031 staff. Approximately 2.5 million additional gross square feet of new academic and research facilities would be added to the approximately 3.8 million gross square feet of facilities on campus today. The University is also proposing extensive redevelopment and new development of on-campus housing. An additional 5,443 bed-spaces and 239 student family units are proposed to house enrolled students. At final buildout, approximately 52% of students would be provided with on-campus housing. An additional 1,874 additional faculty and staff housing units are also proposed. At final buildout, approximately 33% of faculty and staff would be provided on-campus housing. The University is also proposing several modifications to various land use and resource policies previously included in the 1990 LRDP and subsequent amendments.

Our comments on the 2008 LRDP and associated DEIR are outlined in detail in the attached document. These comments center around several major issue areas:

- The need for required enrollment and hiring caps in the 2008 LRDP that could only be modified after additional environmental analysis is conducted for the
accommodation of additional students, faculty, staff, and indirect growth associated with the University.

- Implementation of a phasing schedule for the 2008 LRDP which would assure that enrollment increases do not occur prior to availability of resources (i.e. water), implementation of mitigation measures, and construction and availability of on and off-campus housing and facilities to adequately serve new students, faculty, and staff.

- Effective mitigation by the University of the many impacts to regional resources and services, including landfill capacity, water, traffic, sewer, and fire protection.

- The need for more innovative solutions to address impacts of the 2008 LRDP on water supply given that mitigation measures currently outlined in the DEIR do not appear to effectively reduce the level of these impacts to a less than significant level.

- Concern with development of housing and other sensitive land uses within areas surrounding the Santa Barbara Airport that are subject to elevated noise levels.

- Concern over the exclusion from the 2008 LRDP of several policies previously in the 1990 LRDP that ensure the protection and enhancement of biological habitats and water quality on and off-campus.

- The need for a cumulative impact analysis that considers the impacts (traffic, air quality, water, housing demand, etc) of approximately 200 full time equivalent staff/faculty positions currently at the University that were not considered in the 1990 LRDP and associated EIR and are assumed to be “existing conditions” in the 2008 LRDP and March 2008 DEIR.

UCSB is an integral part of regional issues, resource allocation, and planning in the south coast area and tri-county areas and, as such, should take a leadership role in responding to these issues. We commend the University’s efforts in the last few years to work with the City, County, and other regional governments through working groups and negotiated agreements. We also support the University’s endeavor to provide additional on-campus housing for students and employees of the University. However, we note that enrollment increases, a lack of on-campus housing, and indirect growth from the University in the past has led to a significant existing demand for affordable housing and public services in the South Coast area that has not been sufficiently mitigated. This is reflected in the many unavoidable and significant impacts identified in the DEIR in the areas of housing, traffic, water, landfill capacity, sewer capacity, and fire protection. Resource and housing availability in the Goleta Valley and South Coast area must be shared between many jurisdictions. As the South Coast area’s largest employer, it is critical that UCSB take a leadership role in addressing the regional housing problem through participation in and commitments made through the regional housing allocation process. Additionally, it
is critical that UCSB assure that housing and other resources are available prior to any increases in enrollment or hiring at the University. We also strongly encourage the University to mitigate any potential impacts to public services (water, sewer, fire, etc) and our transportation system through financial commitments and participation in regional transportation planning efforts and agreements.

We wish to acknowledge that the University is a tremendous asset to the community. The City of Santa Barbara is very interested in seeing UCSB succeed as an academic institution. We are willing to work with the University in any way possible to maintain and enhance the goals of University, while also protecting our resources and the quality of life on the south coast.

If you have any questions or concerns about our comments, please direct them to Melissa Hetrick, Environmental Analyst for the City of Santa Barbara at (805) 564-5470 or MHetrick@SantaBarbaraCA.gov. Thank you for the opportunity to comment on the Draft LRDP and EIR. We ask that you continue to keep us informed about the development and implementation of these documents.

Sincerely,

Paul Casey
Community Development Director

George C. Myers
Chair, Planning Commission

Cc: Mayor and Council
    Planning Commission
    Goleta Slough Management Committee
    Jim Armstrong, City Administrator
    Christine Andersen, Public Works Director
    Karen Ramsdell, Airport Director
    Jan Hubbell, Senior Planner
    Bettie Weiss, City Planner
    John Ledbetter, Principal Planner
    Laurie Owens, Project Planner
    Andrew Bermond, Associate Planner
    Rob Dayton, Principal Transportation Planner
    Stacy Wilson, Transportation Planner
    Debra Andaloro, Senior Planner
    Melissa Hetrick, Environmental Analyst
    Barbara Shelton, Environmental Analyst
    Steven Faulstich, Housing and Redevelopment Manager
    Steve Chase, Director of Planning and Environmental Services, City of Goleta
    Kevin Walsh, General Manager, Goleta Water District
    John McInnes, Long Range Planning Director, County of Santa Barbara
    Jamie Goldstein, Deputy Director, Santa Barbara County Redevelopment Agency
    Michael Powers, Deputy Director, Santa Barbara County Association of Governments
Enrollment

The University is proposing to increase enrollment by 5,000 students with a 1% increase in enrollment proposed each year. Additionally, the University proposes to hire 1736 faculty and staff by 2025. While the 2008 LRDP and DEIR consider this the worst case growth scenario, there are no policies or requirements in these documents that ensure that the University will cap enrollment/hiring at these numbers or adhere to the proposed phasing of enrollment. Presumably, with an approximate 67% increase in assignable square feet (asf) of academic and research facilities on campus, there could be up to 67% additional students with commensurate staff, faculty, and indirect “multiplier effect” households. Without enrollment caps, it is unknown what the true worst case scenario may be, the extent of potential impacts, or how effective proposed mitigation measures may be that are identified in the DEIR. The overall number of students and the phasing and timing of enrollment increases could have significant impacts on City of Santa Barbara (City) and regional resources, including housing, water, public services, and traffic, as discussed below. It is critical for the purposes of City and regional planning and adequate environmental analysis that the University guarantees that there will be no more than 25,000 students at the University through the year 2025. Additionally, it is important that the University commits to a schedule which assures that enrollment increases not occur prior to availability of resources, implementation of mitigation measures, and construction and availability of housing and on-campus facilities to adequately serve new students, faculty, and staff.

We, therefore, request that policies be added to the 2008 LRDP and mitigation measures added to the EIR that require enrollment and hiring caps and scheduled phasing of growth at the University. Additionally, we would ask the University to consider formulation of a new agreement between the University, the City of Santa Barbara, City of Goleta, County of Santa Barbara, and other interested parties similar to the Mitigation Implementation Agreement and Cooperative Relations Agreement signed in 1991 that would address enrollment phasing and caps for the 2008 LRDP.

Housing

According to the DEIR, 46% of faculty and staff and 7% of the students at UCSB are currently residing within the City. UCSB, as the largest employer in the south coast area, plays a significant role in the demand for housing in the City through not only its faculty, staff, and students, but also through incidental growth associated with the expanding University. As the University is well aware, there are significant local concerns with the affordability of housing and diminished housing to jobs ratios in the Santa Barbara area. Given the lack of housing affordable to low and moderate income households, high land and construction costs, and other limiting factors, it is assumed that provision of adequate and affordable housing in the region will continue to fall short of demand in the future. The City’s planning process to date has projected buildout of additional units in the City
of Santa Barbara in order to provide for the housing demands resulting from the jobs created by the buildout of non-residential development within the City and to correct the existing jobs/housing imbalance in the City. It has not been assumed in our planning process that the City would need to provide new units to offset the demand for housing resulting from new development at UCSB. Similarly, the City has not assumed that resources, including water and sewer capacity, would be needed to accommodate any additional units. It is critical, therefore, that UCSB recognize the importance of affordable housing and that the University effectively mitigates to the extent feasible all of its impacts to housing, public services, and resources in the region.

We commend the University’s efforts in the last few years to work with the City, County, and other regional governments on regional housing issues. We are also very supportive of the University providing additional on-campus housing for students and employees of the University. However, we are concerned that the demolition of existing on-campus housing, construction of new on-campus housing, enrollment increases, and hiring of faculty and staff are timed appropriately to minimize impacts to the region’s housing market. The 2008 LRDP and DEIR encourage UCSB to phase housing demolition and construction to coincide with housing needs as enrollment and hiring increases. However, there are no requirements that the University provide new housing before increasing enrollment or hiring new employees. The DEIR acknowledges through Impact POP-2 that there could potentially be periods of large housing deficits on campus should there be scenarios where enrollment increases, existing on-campus housing is demolished for reconstruction, and no new housing is yet ready for occupancy.

The measures proposed to mitigate this impact (LRDP Mitigation POP-2A), require the University to monitor enrollment, hiring, and housing levels and cooperate with real estate interests for provision of off-campus housing. These measures would procure housing for new faculty, staff, and students from existing housing stocks, which are already very limited. Additionally, the provision for annual reports to monitor enrollment may be incongruent with the Sundstrom v. County of Mendocino (1998) which ruled that mitigation consisting of further studies are inadequate. There are no requirements in the 2008 LRDP or DEIR for any type of effective action (i.e. freezes on enrollment, reevaluation of the 2008 LRDP, etc) if monitoring shows a housing imbalance. There are also no requirements proposed that the University limit enrollment or reevaluate the 2008 LRDP if it turns out that site constraints (reduced height limits, biological and archeological resources, etc.) limit the overall projected amount of on-campus housing that will be available. It is our opinion, therefore, that the proposed mitigation measures in the DEIR do not mitigate Impact POP-2 to a less than significant level.

The University either needs to ensure effective phasing of housing and enrollment so that there is no housing deficit and/or ensure affordable off-campus housing will be available to students/faculty/staff through coordination with neighboring jurisdictions, contributions to affordable housing projects off campus, or implementation of third party affordable housing programs. These assurances should be effectuated through mitigation measures in the EIR and specific policies in the 2008 LRDP that require these mitigations
prior to increases in enrollment or hiring of faculty and staff. Additionally, we encourage the University to formulate a negotiated agreement with the City and other neighboring jurisdictions addressing the issue of affordable housing demand created by the 2008 LRDP. Finally, the University, as the south coast area’s largest employer, should play a leadership role in the regional housing allocation process.

The following are additional comments on the DEIR and 2008 LRDP in the areas of housing and public services:

- Implementation of the 2008 LRDP would increase enrollment by 5,000 students and include the addition of over 5,443 new bed spaces and 239 units for students on campus. However, it is unclear in both the DEIR and 2008 LRDP if the mix of undergrad vs. graduate student housing units being created matches the corresponding projected enrollment increases for undergrads vs. graduate students. Please clarify.

- There is no indication in the DEIR or 2008 LRDP as to the breakdown of the amount of residential units that will be for sale vs. rent and how that matches up with the percentages of owners vs. renters projected among the new and existing faculty and staff.

- Up until now, onsite employee housing units have only been offered to faculty and there is currently a long wait list to get units. The LRDP states that all faculty and staff units, with the exception of 45 units at West Campus Mesa, will be available to staff too. However, faculty are often offered housing opportunities in their employment contracts and have historically been given preference over staff for available units. Please clarify if faculty will continue to be given preference for on-campus housing and how this may affect demand for off-campus housing for staff of the University.

- The DEIR should describe the policies that will be in place to ensure that on-campus housing continues to be used primarily by active staff and faculty of the University. What will be the specific policies concerning retirement, terminations, or resignations and retention of on-campus housing? The DEIR (Impact POP-3) addresses the possibility that retirement could impact on-campus housing supplies in the near and long term. What about terminations or resignations?

- The University had previously signed and implemented a Cooperative Relations Agreement with local jurisdictions and interests to mitigate deficits in affordable housing for staff created by the 1990 LRDP. This mitigation was to be achieved through a third party affordable housing program. What were the results of this program? How were funds disbursed? How effective was this program at mitigating the impacts of the 1990 LRDP with respect to affordable staff housing?
Public Services

The DEIR identifies several unavoidable and significant impacts from the 2008 LRDP on public services, including sewer capacity, landfill capacity, fire protection, recreational facilities, and schools. While many of these services fall under the jurisdiction of other agencies, it is the University’s responsibility to either ensure mitigation of impacts to these resources or limit enrollment and hiring at the University to levels that can be accommodated by existing resources. Mitigation measures should include financial contributions toward improvements, conservation of resources on-campus, provision of these resources by the University, and/or participation in regional planning processes.

The DEIR should analyze the impacts to public services, particularly police, on the City of Santa Barbara and other jurisdictions from students and employees of the University utilizing areas outside the University (i.e. State Street) for shopping, eating, and other recreational activities.

Growth Inducing Impacts

Considering how much the University contributes to economic and physical growth in the south coast area through retention of alumnae and indirect “multiplier” economic growth, the growth inducing impacts section of the DEIR is very brief and lacking in detail. This section should include a quantitative analysis of the indirect growth in the south coast area resulting from the University and a detailed analysis (quantitative and qualitative) of the impacts of this growth on housing, public services, sewer, water, recreational and park facilities, and traffic in the area.

Facilities Development

The City offers the following comments on non-residential development proposed in the 2008 LRDP:

- The 1990 LRDP proposed an increase of 1.21 million assignable square footage (ASF) of non-residential development over the 1990 baseline of 2.9 million ASF. However, the current ASF for non-residential development for UCSB according to Table 3.0-6 in the DEIR is 2.7 million ASF. Please explain this discrepancy between the 1990 document and 2008 draft.

- Please explain why a 67% increase in ASF for research, academic, and support facilities proposed in the 2008 LRDP is necessary to accommodate a 25% increase in students.

- Please explain how ASF is calculated and the purpose of this measurement for the purpose of planning in the 2008 LRDP. How does ASF differ from gross square feet (GSF)? Given that most jurisdictions use gross square feet as a frame of reference, it
would be helpful if discussions in the EIR and 2008 LRDP concerning ASF also include corresponding information regarding GSF.

Water Supply

The DEIR concludes that there is a lack of available water to serve the projected enrollment and development outlined in the 2008 LRDP. This shortage of available water is a significant regional concern that needs to be effectively addressed in the 2008 LRDP and DEIR. Specifically, our comments are as follows on the issue of water supply:

• It is reasonable to assume that Goleta Water District (GWD) will be able to agree upon a new contract to provide the University with future water allocations equal to their current allocations. The analysis in the DEIR Water Supply section, however, assumes that the projected 526 AFY deficit in water allotments for the University in the future will be largely met (all but 194 AFY) through additional new allocations from the GWD. It is our understanding that the GWD has not provided any guarantee to the University that these additional allocations will, in fact, be entirely available to the University. The analysis of mitigation measures and alternatives in the DEIR evaluate the potential “worst case scenario” of a deficit of 194 AFY of water for the University. However, it would seem that without any type of agreement or guarantee from the GWD, that the worst case deficit scenario would be 526 AFY during normal years. Mitigation measures and analysis of alternatives in the EIR should be evaluated with respect to this revised worst case scenario.

• Mitigation Measure W-3A in the DEIR requires action by another public agency to provide new water allocations to the University. The University does not have the direct authority to require the GWD to pursue other water resources or to approve the sale of water rights from another jurisdiction to the University. Therefore Impact W-3 cannot be mitigated to less-than significant with Mitigation Measure W-3A. This impact should, therefore, be considered significant and unavoidable. We strongly encourage the University to consider more robust and innovative solutions to this the region’s water supply problem, including consideration of desalination, additional water conservation methods, etc.

• The analysis on page 4.14-12 of the DEIR assumes that, for critical dry years, the future water demand would be reduced to 91 percent of normal by means of voluntary water use reduction measures. Specifically what measures would be employed and how would the University ensure that water demand reductions are achieved without requiring these measures? Any identified water conservation measures available should be made required mitigation measures in the EIR and policies in the LRDP. Given the projected deficit in water supplies for future build out and enrollment at the University and the uncertainty of regional and state water supplies in the future, the City would encourage the University to employ any feasible water conservation
measures (including use of recycled water and improvements to the reliability of that system) to the extent feasible during all years, not just critical dry years.

- The water duty factors applied to future residential development (page 4.14-14 of the DEIR) are based on water uses at the Westgate, El Dorado, and Santa Catalina residential developments. All of these developments, however, are undergraduate student housing. Given that 2,705 of the proposed 4,339 new residential units will be for “housed family” or “faculty and staff,” it is unclear whether these water demand rates would accurately reflect the worst case scenario for water uses for the 2008 LRDP. Please describe the assumptions used (number of beds per unit, etc) to come up with the water demand factor used and how that compares with existing water uses at faculty, staff, and family student housing units on campus.

- On June 5, 2008, Governor Arnold Schwarzenegger proclaimed a statewide drought, warning that California's water supply is falling dangerously low because of below-average rainfall and court-ordered water restrictions aimed at protecting fish. The governor also issued an executive order intended to speed transfers of water to areas experiencing the most severe shortages, help local water districts boost conservation efforts, and identify risks to the state's water supply. The EIR should examine the impact of this proclamation and executive order, if any, on future supplies of water in the region and the potential for rationing and required reductions measures in the future.

Traffic and Transportation

The DEIR identifies several significant impacts from the 2008 LRDP to roadway systems and parking areas within the City of Goleta and County of Santa Barbara that are also used by patrons and employees of the Santa Barbara Airport. The following comments address our concerns:

- Please include the City of Santa Barbara in the discussion with the City of Goleta and the County of Santa Barbara in the allocation of proportionate share of transportation impact mitigation in Mitigation Measure TRAFFIC-1A. The City of Santa Barbara would be interested in participating in any discussions and potential future agreements to determine allocation and impact mitigation for impacted intersections. Requirements for fare share contribution to improve impacted intersections described in Mitigation Measure TRAFFIC-1A should also be included as an enforceable policy in the 2008 LRDP.

- Impact TRAFFIC-7 should also address impacts to off-campus as well as on-campus pedestrian and bicycle circulation as a result of the 2008 LRDP. Mitigation Measure TRAFFIC-7A should include fair share contributions toward improvements to those portions of the off-campus bicycle and pedestrian network impacted by the 2008 LRDP.
• Given the extent of traffic impacts identified in the DEIR, we strongly encourage the University to continue discussions with Metropolitan Transit District and local jurisdictions, including the City, to increase the frequency and expand routes for bus transport between all new residential developments, the UCSB campus, popular off-campus residential areas, and local commercial and cultural centers, including downtown Santa Barbara. In particular, the University should encourage bus lines serving all on campus residential developments. We also strongly encourage the University to participate in regional transportation efforts and the development of innovative transportation and parking solutions (rail, flexible working schedules, remote learning and working, etc).

• The proposed addition of 100 parking spaces on campus does not seem adequate to accommodate an addition of 2.5 million gross square feet of academic, research, and support facility space on the campus. The EIR should address the results of any parking demand analysis done for non-residential development on campus and potential impacts there could be from this development to local parking supply and demand and public beach parking.

Noise

The County’s standard for acceptable exterior noise levels for residential use is 65 dBA Ldn as described in the DEIR. This standard should apply to all on-campus housing developments. A substantial number of noise complaints received by the Airport arise from surrounding housing already within areas with existing noise levels above 65 dBA. Therefore, we would recommend addition of mitigation measures in the DEIR and policies in the 2008 LRDP that require UCSB to locate any proposed childcare and housing in areas that do not exceed the 65 dB(a) level. These measures and policies should also require attenuation methods to reduce noise impacts to residential and educational facilities in proximity to noise contours identified by the Santa Barbara County Airport Land Use Plan. The University should also notify all potential residents of on-campus housing of the potential noise generated by the Airport prior to any sale or rental of units. Finally, the University projects proposed in the vicinity of Santa Barbara Airport runway approaches should include the issuance of an avigation easement for the airspace above the project site in order to protect air transportation from encroaching development.

Biological Resources and Water Quality

A large portion of the UCSB campus, including Storke Campus, drains into Goleta Slough. The City is interested in protecting the biological habitats and water quality of Goleta Slough and other regional biological habitats to the extent feasible. The following comments address biological and water quality concerns:

• Please include consultation with the City of Santa Barbara, Airport Department and the California Department of Fish and Game as requirements for projects that have
the potential to impact the Goleta Slough (e.g. within the Slough watershed as defined in the Goleta Slough Ecosystem Management Plan) in Policies ESH-1 and ESH-10.

- The previous 1980 and 1990 LRDPs contained Policy 30240(a).14 which has been excluded from the proposed 2008 LRDP. This policy requires the University to work with the City of Santa Barbara to allow tidal influx from Goleta Slough into the Storke Wetlands through the Airport’s tidal gates. Given the positive results of the Goleta Slough Tidal Restoration Experiment thus far, there could be significant cumulative biological benefits and restoration potential through reintroduction of tidal influx to these campus wetlands and the associated relocation of sewer lines currently located under these wetlands. Policy 30240(a).14 should be retained in the 2008 LRDP and included as mitigation for potential wetland and biological impacts identified in the DEIR (Impact WW-2 and others).

- Several policies in the 2008 LRDP and mitigation measures in the DEIR require additional protection of water quality and biological habitats on the North and West Campuses. However, several other areas of Campus, in particular Storke Campus, are adjacent to and contain sensitive biological resources. Additionally, most areas of campus drain into the environmentally sensitive areas of Goleta Slough, Campus Lagoon, and Devereux Slough. All of these water quality and biological protection measures should be applied to the entire campus. Specifically, Policy MAR-4 requires site drainage be directed through bio-swales or other means to retain and treat stormwater from development sites only on the North and West Campuses. Policy Mar-6 encourages the restoration of wetlands on North and West Campuses. Policy ERO-1 encourages construction during the dry season on the North and West Campuses only. Finally, Policy HAZ-5 requires particular actions should contaminated soils or groundwater be found on the North and West Campuses.

- Policies 302400(b).9 and 30240(b).10 in the 1990 LRDP have not been retained in the 2008 LRDP. These policies establish building setbacks around the Storke Wetlands, protect transition habitats surrounding wetlands, and protect raptor and wildlife habitat and trees surrounding the Storke Wetland in areas directly adjacent to Goleta Slough. These policies should be retained in their entirety in the 2008 LRDP.

- The amendment to the 1990 LRDP for the North and West Campuses, as adopted by the UC Regents and Coastal Commission in 2007, incorporated several water quality and biological protection mitigation measures and policies for the entire campus into the 1990 LRDP. Several of these policies have been excluded from the 2008 LRDP. The omitted policies address buffers and setbacks for wetlands and environmentally sensitive habitat areas, mitigation ratios for habitat disturbance, protection of sensitive bird and raptor habitats, minimization of development in floodplains, required restoration associated with housing developments, and use of native landscaping throughout campus. Implementation of these policies would effectively avoid and mitigate any potential impacts to wetland and biological resources in and around the
campus from proposed development. These policies should be retained in the 2008 LRDP and discussed as mitigation measures in the EIR.

- Mitigation Measure BIO-1A requires the University to obtain all necessary permit authorizations from local, state, and federal agencies prior to the commencement of construction of any portion of the 2008 LRDP. CEQA Guidelines sec. 15124(d) state that permit approvals and compliance are considered to be part of the proposed project. If a project, as proposed with permit approvals, will significantly impact environmental resources, specific and feasible mitigation measures should be proposed to reduce the environmental impact to the extent feasible. Mitigation Measure BIO-1A, therefore, does not serve to adequately mitigate Impact BIO-1 to aquatic and biological resources to a less than significant level. The DEIR should incorporate specific mitigation measures to protect aquatic and biological resources consistent with the comments above.

- Mitigation Measures BIO-3A and BIO-3b conflict in their guidance concerning construction work conducted during the breeding season for sensitive birds. Please consider revising language and merging of the two mitigation measures.

Other Comments

- Analysis of transportation, air quality, water and housing demand and other issue areas in the EIR and 2008 LRDP should consider the existing impact of approximately 200 full time equivalent positions over those analyzed in the 1990 LRDP that are assumed to be existing conditions in the 2008 LRDP.

- The DEIR should include an analysis of the cumulative loss of open space with build-out of the 2008 LRDP considering other pending and approved projects in adjacent jurisdictions including the County of Santa Barbara, City of Goleta, and Santa Barbara Airport. This analysis is relevant to biological and recreational resources in the region.

- The Global Climate Change section of the DEIR should include more detailed information on the quantity of greenhouse gases resulting from buildout of the 2008 LRDP and the specific measures that will be taken to achieve the University’s goal of “net zero” emissions.

- Correct Figure 4.6-1 in the DEIR to reflect the current configuration of Santa Barbara Airport Runway 7-25 and associated approach surfaces. In 2007 this runway was relocated 800' west on centerline.

- In several places in the DEIR, the 2008 LRDP is referred to as the 2007 LRDP.
Response to Comment A-10-1. The enrollment capacity established in the LRDP sets the outer limit of development under the LRDP. Any additional development not provided for in the LRDP would require an LRDP amendment, which would involve environmental review. The recirculated Population and Housing Section adds a new mitigation measure, POP-3A, which commits the University to provide housing for each added increment of enrollment within four years of its addition. Despite this commitment, the recirculated EIR section acknowledges that enrollment increases could have a significant impact on regional housing during that four-year lag and, therefore, determines that the impact remains significant and unavoidable (please see EIR pp. 4.10-30 to -33). Due to the uncertainties involved in planning, financing, and constructing campus housing developments, the availability of housing will never exactly match housing needs. Four years, from planning and design to permitting and construction, is the amount of time the University can reasonably expect will be required to provide new housing to meet increased demand.

It is important to note that actual enrollment numbers vary and could from time-to-time exceed the capacity due to the uncertainties associated with entering classes. The 2010 LRDP is a plan for increasing the enrollment capacity of the University to 25,000. As has happened in the past, actual enrollment at the University can, for a period of time, exceed the enrollment capacity. This is because of the inability to precisely gauge the number of accepted students who will choose to enroll. The University can control the ultimate number of students on campus over the school year by adjusting the number of transfers, but the Fall enrollment depends on the ability to estimate how many of the students accepted will actually attend UC Santa Barbara, or will choose to attend another school to which they have been accepted.

Response to Comment A-10-2. In the recirculated DEIR, mitigation in Section 4.10 was amended to provide that the University would construct sufficient housing for enrollment increases with no more than a four-year lag between enrollment and housing. It also includes a range of measures the University could take to relieve temporary housing shortages, such as increasing the density of housing on campus (more beds per unit).

Response to Comment A-10-3. The following sentence in Section 4.10.2.2 (p. 4.10-26) has been amended as follows:

This amount of housing is sufficient to accommodate all new enrollment, including students with spouses and children, and has been designed to be flexible, in order to serve either graduate or undergraduate students as well as students families, depending on demand.

Response to Comment A-10-4. The following text has been added to Section 4.10.2.2 (p. 4.10-26) to clarify this issue:

Faculty and staff housing units may be offered for sale or for rent, depending on several factors, including construction costs and financing requirements, regional market forces, and consumer demand. Whether University housing will be for sale or rent will be determined at the time a project is proposed.

Response to Comment A-10-5. Section 4.10.2.2 includes the following statement:

The 2008 LRDP states that 1,874 additional faculty and staff housing units (homes, condos, or apartments) will be provided at buildout. This amount is sufficient to accommodate all new employees anticipated under the plan, including spouses and children.
The 2010 LRDP proposes 300 additional faculty and 1,400 additional staff over the plan’s lifetime. The number of housing units proposed is sufficient to meet the total housing demand for both categories of employees.

Response to Comment A-10-6. The Population and Housing Section was recirculated. The following discussion has been added to the discussion under cumulative effects (RDEIR, p. 4.10-36):

**Retirement.** A large number of UC Santa Barbara employees will retire during the LRDP’s planning horizon. According to a survey conducted in 2003, 72% of respondents (UCSB faculty and staff) were in the “baby boomer” age group (defined at the time of the survey as between the ages of 39 and 57). In 2025 that age range will be 61 and 79.

A reasonable rough estimate is that half of the faculty and staff on campus today will retire within the next ten years. This will not happen all at once, so there will not be a precipitous increase in new hires. It will be gradual and new hires will filter into the housing market. Nevertheless, the number of new hires seeking housing to replace retiring faculty and staff will be several hundred per year.

In addition, it cannot be stated with any certainty how many retiring faculty and staff will stay at their existing residences, and thus indirectly increase the housing supply pressure for their replacements. Santa Barbara is an attractive area for retirement given the weather and recreation opportunities.

Some portion of replacement faculty and especially staff will come from nearby communities, and will not require additional housing. Also, occupants of University employee residences could be either new or replacement employees. This will be an ongoing issue for the University, because the cost of housing is often the primary deterrent to hiring and retention of new faculty and staff.

Because of the uncertainties created by individual decisions, the timing and intensity of the effect on the housing market cannot be predicted. However, it is a certainty that several thousand employees of the University will be replaced during the life of the LRDP. Some will move away, but many will stay in their homes. This will remain an important consideration in understanding the dynamics of the local housing market and the University’s effect on it. Because of the slowness in developing new housing in the area, replacement employees will tend to reside farther from campus. More employees will seek housing in the faster growing areas of Ventura, Lompoc and farther north in Santa Maria.

The following text has since been added to the foregoing discussion:

Permanent occupants of campus faculty and staff housing will be required to be employees of the University. Potential buyers of for-sale campus faculty or staff housing units will be required to have an offer of employment from the University prior to sale.

Although the section addresses retirees in particular, the discussion applies to those who are terminated or resign as well. Employees who occupy campus housing and retire, who are terminated, or who resign, would seek other housing as discussed above.

Response to Comment A-10-7. The Cooperative Relations Agreement was implemented in full, and has expired. In accordance with the Agreement, funds for affordable housing were set aside, but have not yet been disbursed pending agreement with the Coastal Housing Partnership regarding a suitable housing project.

Response to Comment A-10-8. Mitigation of impacts to public services is addressed in each relevant impact section and statement. Please see DEIR Section 4.11 and 4.12, and RDEIR 4.15.

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Response to Comment A-10-9. Under CEQA, a project has an environmental impact related to public services if it increases demand for those services and meeting that demand would result in a physical impact to the environment, as when facilities like police or fire stations must be enlarged or constructed. As noted in the DEIR, impacts to relevant law enforcement service were determined to be insignificant.

Response to Comment A-10-10. The economic effects the University has on the region are discussed in the The Economic Forecast Project’s 2008 study (University of California Santa Barbara Economic Forecast Study). Growth of the University would continue to contribute in similar ways as have been analyzed in that report, and would affect the region in numerous ways. Indirect impacts are analyzed as cumulative impacts. Hence, each impact area is analyzed as to its contribution to relevant settings within the framework of development in the region. For example, because housing is a regional issue, RDEIR Section 4.10 Population and Housing Section discusses housing for all areas in the region, including the City of Santa Barbara. The various “multiplier” effects of University activities are discussed in relation to the demand for housing in Section 4.10.2.2. Other topical sections have similar types of discussions.

Response to Comment A-10-11. The 1990 LRDP “Baseline” space figure was 1,944,711 ASF, not 2.9 million ASF. Space needed for research, academic, and support functions are not directly correlated to the number of students, because space requirements vary widely according to the type of use, and uses which do not necessarily grow commensurately with enrollment. Public university and colleges use ASF as a space accounting unit. The ratio of ASF to GSF is approximately 1:1.6.

Response to Comment A-10-12. The RDEIR’s analysis of water supply is based on an analysis of district-wide water supply and demand, and considers whether the Goleta Water District has sufficient supplies available to serve future demand associated with development under the LRDP along with other regional growth. Please see Master Response - Water Supply sections I, II, and V.D.


The RDEIR contains a variety of mitigation measures to address the LRDP’s impact on cumulative demand for potable water. See Master Response - Water Supply section VI. Mitigation Measure W-3F has been revised and now states:

LRDP Mitigation W-3F: The University shall work to identify and acquire additional water supplies beyond those currently available to GWD as necessary to serve UCSB potable water demand independently or with GWD, as appropriate.” (RDEIR, p. 4.14-34.)

This mitigation can be implemented either by the University independently or by the University in partnership with the District. In conjunction with the other proposed mitigation measures, Mitigation W-3F will reduce the LRDP impacts to future potable water supplies to a less than significant level. The feasibility of procuring additional water is discussed in Master Response - Water Supply section VI.B.

Response to Comment A-10-14. The demand reduction to which the commenter refers was not used in the analysis in the District’s 2008 WSA, and therefore was not used in the RDEIR’s analysis. See Master Response – Water Supply section I. The WSA and the RDEIR assume one demand reduction: although demand typically increases in dry years (the “dry year surcharge”), the WSA assumes, a demand reduction program would eliminate that surcharge in a critical dry year and in the fourth, fifth, and sixth years of a multiple-dry year sequence. WSA at p. 19-20. The RDEIR, following the WSA as recommended by the District, uses the same assumption. Please also see response to comment R-13-69.

Response to Comment A-10-15. Please see Master Response - Water Supply section V.B.
Response to Comment A-10-16. Executive Order S-06-08, issued on June 4, 2008, stated that drought conditions existed in California. In response to these conditions, the Order directed the state Department of Water Resources to take a series of actions to facilitate and encourage water conservation and transfers of water to avoid shortages. The Executive Order did not impose any restrictions on SWP operations or take any other actions that would affect the reliability of SWP deliveries.

Response to Comment A-10-17. The University’s commitment to funding its fair share of the cost of improvements required to mitigate traffic impacts is presented in the Recirculated Draft EIR Transportation & Circulation Section 4.13 in Table 4.13-52, and is further discussed in the Master Response to Transportation and Traffic Mitigation.

Response to Comment A-10-18. The City commented that Impact TRAFFIC-7 should also address impacts to off-campus as well as on-campus pedestrian and bicycle circulation as a result of the 2010 LRDP, and that Mitigation Measure TRAFFIC-7A should include fair share contributions toward improvements to those portions of the off-campus bicycle and pedestrian network impacted by the 2010 LRDP.

Upon receipt of this comment, the University updated the transportation study to include further information on the University’s fair-share contribution to mitigating project impacts, including on and off-campus bicycle and pedestrian impacts. Bicycle and pedestrian improvements are proposed as part of the LRDP to accommodate planned growth. The University is committed to working with agencies and local jurisdictions to ensure a complete and comprehensive impact study is conducted for the LRDP. Therefore, several sections of the Draft EIR were revised and released for public review and input as part of the Recirculated Draft EIR. The fair-share information is presented in the Recirculated Draft EIR Transportation & Circulation Section 4.13 in Table 4.13-52 and page 4.13-117.

Response to Comment A-10-19. Pursuant to LRDP Mitigation TRAFFIC-8A, the University will work with MTD and local jurisdictions to improve transit service on campus.

Response to Comment A-10-20. The LRDP proposes to house the entire increased increment of both students and faculty and staff (which will be served by the proposed 2.5 million gross square feet) in new housing on campus. These residents will be given parking permits for their places of residence, but not on the Main Campus (unless that is where they live), thereby discouraging them from driving to the Main Campus and encouraging them to leave their cars at their places of residence and using alternative modes of transportation to get to work and/or school. The campus will be adding approximately 4,000 new parking spaces—some on the Main Campus. All but 100 of the new spaces will be associated with new housing. Providing 100 additional spaces for campus visitors (i.e., not faculty, staff or students) is in line with current demand trends.

Response to Comment A-10-21. Section 4.9.2.1 states that the standard for noise-sensitive uses is 65 dBA Ldn. This includes housing and schools or child care settings. As stated in the NOISE-2 discussion, no institutional land uses (which would include day care) are permitted within the 65 dBA range, and residential uses would only be permitted if interior noise levels are reduced to 45 CNEL.

Mitigation NOISE-2A (p. 4.9-26) is amended as follows:

| LRDP Mitigation NOISE -2A:                      | Implement existing Santa Barbara County Airport Land Use Commission policies as applicable to the University of California. |
|                                              | Notify potential residents of on-campus housing of the potential noise generated by the Airport prior to sale or rental of units. |
Aviation easements shall be offered for the airspace above projects proposed by the University in the vicinity of the Santa Barbara Airport runway approaches.

Response to Comment A-10-22. The University will continue to include consultation with the City of Santa Barbara, Airport Department and the California Department of Fish and Game as requirements for projects that may impact the Goleta Slough. Mitigation BIO-1D has been amended as follows:

LRDP Mitigation BIO-1D: Project plans for any development under the 2008-10 LRDP within 100 feet of aquatic resources shall include design features to minimize the effects of increased noise, lighting, and automotive and foot traffic density on the adjacent aquatic resource. In the case of development within 100 feet of Goleta Slough, plans shall incorporate consultation with the City of Santa Barbara Airport Department, in addition to consultation with the agencies listed under Mitigation BIO-1A.

Response to Comment A-10-23. The University has and will continue to support introducing tidal influx to the Storke Campus wetlands. Mitigation for Impact BIO-1 has been amended to include the following:

LRDP Mitigation BIO-1E: The University shall work with the City of Santa Barbara and West Goleta Sanitary District to reintroduce tidal influx to the Storke Wetlands.

The recirculated Wastewater Section (p. 4.15-15) has been amended as follows:

LRDP Mitigation WW-2B: The University shall work with the Goleta West Sanitary District to relocate sewer lines currently located in or under the Storke Wetlands.

Response to Comment A-10-24. Many mitigation measures and policies of the LRDP require protection of water quality and biological habitats on the North, Storke, West, and North Campuses. However, to streamline mitigation efforts, the following policies and mitigations have been amended as follows:

LRDP Policy MAR-4. Where feasible, site drainage from North and West Campus development areas to Phelps Creek and Devereux Slough environmentally sensitive areas shall be directed through bio-swales or shall use other similar integrated storm-water management practices that allow or mimic natural drainage hydrology functions to provide natural infiltration and filtration. Storm-water best management practices shall be utilized to reduce runoff, control sources of pollution, and treat runoff prior to conveyance to local streams or creeks. Piping of storm-water under roadways and sidewalks shall be permitted.

LRDP Policy MAR-6. Wetland and riparian vegetation enhancement shall be conducted, to the maximum extent feasible, along Devereux Creek among all applicable Campus areas where there would be impacts. Any future regional open space planning efforts, including development of a Final Open Space Management Plan, open space or habitat management plans the Ellwood-Devereux, shall include this policy.

LRDP Policy ERO-1. North and West Campus. Whenever possible, construction periods shall be scheduled during the dry months of the year (May through October), for projects which may present risk for erosion and that would impact environmentally sensitive areas, whenever possible.
LRDP Policy HAZ-5. If contaminated soil and/or groundwater is encountered during excavation and/or grading activities on North and West Campuses, except in the location of the Venoco Co leased property: […]

Response to Comment A-10-25. Development proposed in the LRDP has been located to avoid sensitive resources. Building setbacks are thus not necessary to mitigate any significant environmental impacts. Policies protecting wetlands and other habitats are included in LRDP Sections D. and F.

Response to Comment A-10-26. The DEIR and RDEIR address these issues throughout the relevant sections. Development proposed in the LRDP has been located to avoid sensitive resources, thereby eliminating the need for building setbacks. ESHA and other resource protective policies have been adopted in LRDP Sections D and F.

Response to Comment A-10-27. Additional mitigation measures are proposed in the EIR which reduce Impact BIO-1 to a less than significant level (EIR, pp. 4.3-30, 31).

Response to Comment A-10-28. The two mitigation measures (BIO-3A and -3B) provide options for tree removal. Avoidance is preferred, but procedures applicable to removal are specified where avoidance cannot occur. To clarify, Mitigation BIO-3A has been amended as follows:

LRDP Mitigation BIO-3A: To avoid disturbance or loss of active bird nests during development under the 2010 LRDP, any removal of eucalyptus, coast live oak, pine, cypress, or other trees that provide nesting habitat for birds, or disturbance of natural grassland areas shall, when practicable, be conducted between September 15 and February 15, outside of the typical nesting season.

Response to Comment A-10-29. Analysis of transportation, air quality, and water and housing and other issues areas were based on the existing setting at the time the DEIR was prepared, as CEQA requires.

Response to Comment A-10-30. As addressed in Section 4.12.2.5 of the DEIR (p. 4.12-28 to 4.12-31), the cumulative scenario includes population growth projections from SBCAG for the cities of Goleta, Santa Barbara, and the county. As noted in that section, the cumulative impact to recreational facilities is determined to be significant and unavoidable. The cumulative impacts to biological resources from proposed development and increased demand for recreation are addressed in Section 4.3.2.4 of the DEIR (p. 4.3-42).

Response to Comment A-10-31. Section 4.2 (Air Quality) has been amended and recirculated and provides more clarity regarding greenhouse gas emissions and University goals.

Response to Comment A-10-32. Figure 4.6-1 was based on the configuration at the time the DEIR was prepared. Regardless, the new configuration of Runway 7-25 pushes the approach zone further away from any campus properties and does not present a significant change3.

Response to Comment A-10-33. The LRDP that will be sent to The Regents for approval is referred to as the “2010 LRDP.”

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3 Source: Santa Barbara Airport Diagram. Available at: http://204.108.4.16/d-tpp/1005/00378AD.PDF
June 23, 2008

Mr. Gene Lucas
Executive Vice Chancellor
University of California Santa Barbara
Santa Barbara, CA 93106-1030

Re: Comments on Draft Vision 2025 Long Range Development Plan

Dear Vice Chancellor Lucas:

The City of Goleta would like to express its appreciation for the presentation on the University’s Draft Vision 2025 LRDP made at the City Council meeting of April 1, 2008. The City has reviewed the draft planning document and hereby submits formal comments for consideration by the University. Goleta’s comments on the Draft Environmental Impact Report are being provided in a separate letter.

First and foremost, a bit of context is in order. This comment letter is the product of considerable analysis by City staff, coupled with the review of draft language by the full City Council on June 17th. At that time, the City Council received a staff presentation, invited public comments (of which there were many from residents in the Storke Ranch neighborhood), deliberated on the substantive issues at-hand, and provided me the authority to sign and forward this letter to the University. In so doing, the City Council felt that this letter needed to begin with a setting of stage or, put another way, provide a perspective on the growth and change envisioned in the LRDP.

Simply put, the order of magnitude of growth and change that UCSB is planning for is tremendous. What the plan calls for is disproportionately larger than what the Goleta Valley’s finite natural resources and capital public works can reasonably support, now and probably into the future. UCSB’s plan, if approved and realized, would leave little or no room for the small, modest endeavors of the valley’s residents and businesses over time. The plan could take the built environment to a state of at-capacity or over capacity. That is a very serious matter that needs to be carefully understood, deliberated and locally resolved.
It is imperative that the information and data base upon which the plan is based is accurate and that the assumptions are valid and the scenarios or options fully vetted. The City does not believe that has occurred. The LRDP has come up short, not in its endeavors to communicate and conduct public outreach, but in the substantive content of what is being communicated. In the opinion of the City Council, our technical staff and the many local residents that have contacted us, there are critical lapses in the LRDP and there is a compelling need to re-work and re-circulate it. We also believe that the Draft Environmental Impact Report is way off the mark in terms of its identification of impact levels, analysis and findings and requires substantial re-working and re-circulation as well.

Our call for re-working and re-circulation is not said lightly, for we know of and appreciate the efforts expended by the University. Equally, our call for such should not be taken lightly, for the plan and its DEIR are fundamentally flawed. There is too much at stake for the University to press forward with a fundamentally flawed plan, one that overwhelms the resource base, public works and community tolerances of the Goleta Valley, and one that may have dramatic spillover effects on the City, particularly in the areas of housing, recreation, traffic, water, stormwater, schools, social services and public safety services. These issues must be mutually resolved.

Key Issues

A summary of key issues that need resolution before the LRDP goes forward is as follows:

1. **Pace of Housing Development**: Adoption of the LRDP in the current form would allow the full enrollment increases to be realized along with the associated increases in faculty and staff, with no guarantee that required housing (necessary to avoid impacts to the surrounding communities) will be available. The LRDP does not contain any binding or measurable provisions to ensure that development of the proposed on-campus housing is not outpaced by the proposed 5,000 new students, the 1,736 new faculty and staff, and expansions of academic and support space.

2. **Enrollment Potential**: The LDRP substantially underestimates the enrollment potential created with construction of the proposed academic and support space assignable square footage (ASF).

3. **Land Dedicated to Recreational Land Use**: The amount of new land dedicated to recreational land use in the LRDP (net four acres) is disproportionate to the 25% increase in student enrollment and the 37% increase in faculty and staff, and appears to be inconsistent Coastal Act Section 30255.

4. **Off-campus Street and Highway Improvements**: The LRDP does not explicitly acknowledge or adequately address the University’s obligation to assist with off-campus street and highway improvements, necessary to accommodate the proposed on-campus growth. This is of significant concern to the City and must be resolved accordingly.
5. **Public Safety:** The LRDP needs to provide funding and capital improvements in the areas of law enforcement and fire protection, commensurate with growth in population and buildable space.

6. **Neighborhood Compatibility:** The LRDP also needs to incorporate neighborhood compatibility measures to mitigate the size, bulk, scale and density of development that is proposed near the Storke Ranch residential tract. Matters such as noise, light, glare, height, aesthetics, and traffic are of particular concern.

**Detailed Comments**

The following detailed comments are provided about the content of the LRDP:

7. The document should state, at the appropriate place(s) in the text, that all roads and highways which provide vehicular access to the campus (and to Isla Vista) traverse through Goleta. Therefore, increases in traffic as a result of growth envisioned by the LRDP (as well as by planned growth in Isla Vista) will be experienced on streets and at intersections within Goleta.

8. The LRDP does not propose to increase, through new acquisitions, the amount of campus land beyond that existing as of 2007. The City supports this approach, but notes that all growth envisioned by the LRDP will, therefore, be realized through increased densities by developing presently vacant or open lands and by redeveloping properties with existing structures with new structures that are substantially larger and higher. Although higher densities may have certain virtues, they also create greater challenges in terms of designing quality environments that meet all human needs and minimize the potential for social problems. In times of scarce public financial resources, there are concerns that available resources will not always be sufficient to meet the higher standards and costs required to create quality high-density environments.

9. The extent of reliance by the LRDP on redevelopment of property with existing capital improvements does not adequately acknowledge that the costs of such redevelopment are generally higher per unit of net additional floor area created.

10. The LRDP's proposed increases in the number of students, faculty, and staff were assumed in the studies related to the *Goleta General Plan / Coastal Land Use Plan* adopted by the City Council in 2006. However, the Goleta planning documents assume that only a fraction of the University's growth will be accommodated by on-campus housing, and that substantial amounts of students, faculty, and staff will need to be housed in nearby communities, including Isla Vista and Goleta.

**Section B: Context**

12. **Page B.4.** Add “Fairview Avenue and other local streets” after Storke Road. University-related traffic affects numerous streets in the City, not just those that provide direct access to the campus entry points.

13. **Page B.4.** Under Ellwood-Devereaux Coast at the end of the last sentence insert: “, the acquisition of which was accomplished by the City of Goleta in 2005.” The map in Figure B.2 needs to be updated to show City ownership of the Ellwood Mesa (Sperling Preserve) property and lands traded to SB Development Partnership (Comstock Homes) that were formerly part of SB Shores Park.

14. **Page B.5.** Under discussion of the *Isla Vista Master Plan*, the description appears to suggest that the IV plan is intended to accommodate growth in the student community, but the LRDP proposes to house all additional students, faculty, and staff on campus lands.

15. **Page B.9.** Under “Leaseholds,” the document states that the Venoco lease expires in 2016, at which time the property will be returned to open space. Elsewhere the document further provides that the lease will not continue past 2016. The City supports these provisions of the LRDP, including the return of the site to open space as soon after 2016 as possible given the decommissioning of the Marine Terminal facilities and clean-up of the site.

16. **Page B.17.** Under “Parking,” the text refers to average parking use whereas Table B.7 refers to “Peak” parking use. Clarification is needed as to which is correct.

17. **Page B.17.** Under “Alternatives,” the data indicate that of the students who commute to campus other than by bicycling or walking (which is to say communting by students that live in Goleta or other communities rather than those that live on campus or in Isla Vista) two-thirds commute by single-occupant vehicle and only 1/3 commute to campus by bus or carpools. The document needs to provide greater emphasis on additional measures that will promote use of bus transit and carpools, since present measures directed to students living in these off-campus areas are not as successful as they should be.

18. **Pages B.18 and 19.** Under “Sustainability,” the LRDP fails to note that various green initiatives are overshadowed by the proposal to substantially increase ASF per student. The proposed greater amount of ASF per student will have the effect of offsetting many of the benefits of green building technology.

**Section C: Framework**

19. **Page C.3.** Table C.1 should state enrollment change since the 1990 LRDP, rather than from 1995 to 2007.

20. **Page C.3.** Under “State and Community Context,” the last sentence should be changed to read “… new companies in the Santa Barbara – Goleta area.
21. The LRDP does not adequately explain or justify the reasons for such a major expansion of building space per student (a 260% increase per student). If the proposed net increase in ASF were occupied with the same ASF per student as the present (2007) enrollment, the proposed net increase in building space would accommodate an additional 13,000 students. The City has concerns that the proposed building space, if built, could result in a much larger future increase in enrollment (and faculty) than is set forth in the LRDP, with correspondingly greater impacts on adjacent communities, including Goleta. The LRDP substantially understates the enrollment capacity of the proposed total ASF of building space. The text refers to "current shortfalls" but does not provide any data, comparative or otherwise, to justify this statement and the fact remains that the current enrollment is (and the future growth could be) accommodated with 136 ASF per student even if not considered optimal.

22. Page C.7. Under “Planning,” the document states that existing campus development does not reflect the values sought because of the narrow focus of the University’s past funding and implementation processes on individual buildings to the detriment of important overarching goals. This apparently reflects a major failure of the 1990 LRDP or at least a failure in its implementation. The LRDP does not provide any explanation of the methods by which a different (and better) result will be secured with the LRDP. A sense of “overall order or consistent quality” will be of even greater importance in implementing the LRDP because of the significant increase in campus density that is proposed.

23. Page C.8. The last paragraph under “Planning” states that the LRDP represents a major commitment to campus housing by proposing to house all additional students, faculty and staff in new on-campus housing. While this may be a worthy goal, it appears to be an unrealistic one, since only about 30% of students and 6% of faculty (21% if approved but unbuilt units are included) were accommodated in on-campus housing in 2007 and no units (0%) were set aside for the 3,631non-faculty staff. The Draft LRDP does not explain how it is plausible for the University to increase the number of student beds by 5,443 (from 6,652 to 12,095), the number of faculty and staff units by 1,874 (from 226 to 2,100). These represent increases of 82% and 829%, respectively, in the number of student beds and faculty/staff units over the amounts existing (and approved) as of 2007. To suggest that development of anywhere near these numbers of units is a priority is grossly misleading in an era which is likely (as in the past) to be characterized by scarce financial resources. A much more likely outcome is that greater priority will be placed on construction of new academic and support space, with housing substantially lagging behind. The effects of this misleading scenario is to create an artificial and unrealistic “project description” for evaluation in the EIR that will drastically underestimate the likely impacts on Goleta and other nearby communities. In fact, the document states (on Page C.9) that all of the development proposed in the DRDP will not be complete by 2025. However, the LRDP, once adopted, would allow the full enrollment increases to be realized along with the associated increases in faculty and staff.
Section D. Land Use and Development

24. Page D.3. The data in Table D.1 indicate that 81 acres are proposed to be devoted to recreation land use, while the data in Table B.1 indicate that in 2007 there were 77 acres of land used for recreation. The proposed net increase of four (4) acres of recreation land to serve an additional 5,000 students and 1,736 faculty and staff (plus their families), all of whom are proposed to be accommodated in on-campus housing, is disproportionately small and unbalanced. The data represent an increase of only 5% in land designated for recreation use compared to increases of 25% in the number of students and 37% in the number of faculty and staff. These latter percentages would be even higher if they were based on the numbers housed in on-campus housing, which are the more likely users of on-campus recreational space. As a result, it appears that the proposed LRDP is inconsistent with Coastal Act Section 30255.

25. Page D.3. The data in Table D.1, when compared with the data in Table B.1, also indicate that there is no increase in the amounts of land to be set aside for open space type uses (the open space, environmentally sensitive habitat areas, Coal Oil Point Reserve, and Coal Oil Point Reserve/ESHA classifications in Table B.1). Given the substantial increases in campus population (6,736 plus families of faculty and staff), these valuable and sensitive areas are likely to be subjected to much greater levels of use and an increased potential for degradation of the resource values.

26. Page D.7. Under “Development,” (Academic and Support and Housing), the comments set forth above in items 15 and 17 apply to these sections, as if fully set forth again under this item.

27. Pages D.7 through D.15. Large portions of the proposed new facilities are proposed to be created through redevelopment of land with existing structures, which would need to be demolished to make way for the new construction. The LRDP fails to adequately take into account the fact that redevelopment is more expensive relative to development on vacant land due to the costs of demolition and to the removal of capital assets that have to be replaced. To obtain the net increase in building area, the new building must replace the existing space plus construct the net additional floor area. Thus redevelopment is inherently more costly (on a net additional ASF basis), and may be difficult to justify in times of scarcity of financial resources. The LRDP’s reliance on massive redevelopment of existing campus facilities appears unrealistic, at least in the year 2025 time frame of the plan.

28. Overall Comment Regarding Land Use and Development. Proposed UCSB housing at the Storke Campus and West Campus areas appears out of character with the nearby Storke Ranch residential neighborhood, particularly in terms of building intensity (i.e. height, size, bulk and scale). The housing villages that UCSB is planning should be setback a considerable distance from the Storke Ranch tract and re-thought out in terms of neighborhood compatibility issues (i.e. visual, light, glare, noise, pedestrian and vehicular traffic, as well as passive and active recreation).
Section E. Transportation and Parking

29. **Page E.3.** The LRDP does not explicitly acknowledge or adequately address the University's obligation to assist with addressing the off-campus street and highway improvements that will be necessary to accommodate the proposed on-campus growth without significant congestion and deterioration in the levels of service on those roads (and their intersections) that provide access to the campus. The document should note in the text that all streets and highways that provide access to the campus (and to the IV community) pass through the city of Goleta.

30. **Page E.7.** The LRDP states that housing all future increases in students, faculty and staff within a mile of the main campus will reduce the need for more commuter parking spaces. This statement will be partially correct only to the extent that the University succeeds in securing funding to construct the on-campus housing units proposed. As stated above, the City of Goleta concludes that this is not the most likely outcome. To the extent that new housing development does not keep pace with the development of other on-campus space, additional demands for commuter parking will be experienced. The City is concerned that if insufficient parking is provided on-campus, there will be spillover to adjacent communities, including Goleta. This condition already occurs on an occasional basis during campus special events.

31. **Page E.8.** The City is concerned that insufficient quantities of parking are being proposed for the new faculty, staff, and married student residential units. The parking ratios used are less than those required by the City for equivalent off-campus residential projects in Goleta. Goleta's experience is that the parking ratios required are needed and do not result in surplus, unused parking spaces.

32. **Page E.9.** Under “Coastal Access” the document's reference to coastal access parking to be provided adjacent to the North and West campuses is irrelevant to the determination of the University's obligation to provide additional parking spaces dedicated exclusively to public coastal access as a consequence of the substantial growth planned by the University. Since the referenced parking is outside the boundaries of the LRDP, these statements should be deleted. It is noted that the University charges (through meters or parking fees) for use of many of its parking spaces supposedly dedicated for coastal access, whereas nearby communities such as Goleta provide such dedicated public coastal access parking without cost to users.

33. **Page E.9.** Under “Coastal Access” the 4th paragraph refers to the Anza and Coastal Trails. The latter part of this sentence should be revised to read “...connect with the bluff-top coastal and Juan Bautista de Anza trails that traverse the City of Goleta's Sperling Preserve and Santa Barbara Shores Park.”

34. **Page E.11.** The proposed limitations on use of coastal access parking spaces (in policies Trans-4 and Trans-10) are too restrictive, vague, and open ended; their effect could be to unreasonably restrict or prohibit use of public coastal access parking spaces.
35. **Page E.12.** The policies should include acknowledgement that an additional 6,736 on-campus residents (plus the additional population comprised of families of faculty and staff) will generate a substantial increase in needs for coastal access facilities and explicitly state the access improvements that are proposed to accommodate that increased demand in a manner that will not result in degradation of coastal access facilities or natural resources. This increased usage will also be experienced in nearby community coastal access facilities, including those of the City of Goleta, particularly at the Sperling Preserve and Santa Barbara Shores Park.

**Section F: Open Space and Landscape**

36. **Page F.8.** Statements under the topic “Campus Policies” indicate that policies of the Draft LRDP require the removal of the Ellwood Marine Terminal by 2016 and restoration of the area as a “nature park.” The City of Goleta supports these policies and the restoration of the site to natural open space.

37. **Page F.8.** Policy ESH-4 appears to allow removal of non-native trees such as eucalyptus if the trees do not provide habitat for a rare or sensitive species. The City of Goleta has concerns that this policy would allow destruction of trees that provide habitat for monarch butterflies, including roosting sites, since monarchs are not listed as a rare or endangered species. Monarchs are, however, a species of great local importance because of the size of the “Ellwood Complex” over-wintering site, which is one of the largest in the state. This complex includes the Ellwood Main site on the City’s Sperling Preserve and the adjacent Coronado Monarch Preserve of the Land Trust for Santa Barbara County. Monarch specialists have concluded that all of the related temporary roosting sites in the Ellwood complex are important for the preservation of the Ellwood Main site. The size of the western Monarch population is especially vulnerable to changes in or destruction of its over-wintering sites because of the limited number of locations that provide all of the factors necessary for a viable site.

38. **Page F-15.** Policy MAR-6 refers to development of a “Final Open Space Management Plan” for the Ellwood-Devereux area. Each jurisdiction’s final California Coastal Commission-certified coastal land use plan (or the LRDP in the case of the University) will in effect constitute the “Final” plan. There is no separate multi-jurisdictional document that needs to be prepared outside the context of the Commission-certified documents. This policy statement needs to be revised accordingly.

**Section G: Utilities and Infrastructure**

39. **Page G.2.** The “Water” section does not address the question of the amount of water supply that is needed to accommodate an additional on-campus population of 6,736 students, faculty, and staff (plus the family members of faculty, staff, and married students). Nor does it address whether sufficient water supply is presently allocated by GWD or whether additional allocations will be needed. The effects of
allocations of additional water on other existing and future customers of the GWD need to be acknowledged as an issue.

40. **Page G.3.** Policy HAZ-7 should be stronger and indicate that the University will work with the County Energy Division to ensure that permitting for decommissioning the Ellwood Marine Terminal is commenced with sufficient time to complete the process by the date of expiration of the lease. The policy should also note that the financial and other obligations associated with decommissioning and restoration of the site are those of the leaseholder. The policy should note the requirement for submission of a detailed decommissioning plan prior to consideration of necessary permits.

**Section H: Implementation**

41. **Page H.16.** Under “Monitoring” and in appropriate sections of the implementation procedures, the document needs to include a detailed statement of the requirement for a LRDP consistency report for each construction project that requires Board of Regents and/or California Coastal Commission action or approval. As a minimum, this monitoring report should include the following items: a) the balance between the amount of ASF that has been approved/constructed to date and the amount of student, faculty, and staff housing that has been approved/constructed and any accumulated shortfall in the required number of beds/units; b) any change in the net ASF per student as a result of the project; c) monitoring of traffic volumes and LOS at key road segments and intersections in the adjacent communities; d) the amount of water supply needed to serve the project, the cumulative water use of the University, with a comparison to the contracted and allocated water supply from the GWD; and e) the volumes of wastewater generated by the project and the cumulative wastewater volume generated by the University.

42. **Page H.16.** A mechanism that is measurable and mandatory needs to be included in the LRDP to assure that the on-campus housing development keeps pace with the new construction of building space (ASF) for academic and support activities. This is especially important since the Draft EIR presumes that all increases in the student, faculty, and staff populations will be accommodated in on-campus housing. To the extent that construction of new on-campus housing does not keep up, impacts would be commensurately greater in off-campus communities than is stated in the DEIR.

**Schools and Social Services**

A comment that came forward from the public during our June 17th meeting, that particularly resonated with the City Council, was the effect of the LRDP on Isla Vista Elementary School, as well as neighborhood schools and day care centers in general. We heard concerns about capacity of those services and inquiries about the planning efforts necessary to accommodate UCSB’s new growth relative to those service systems. This is an issue that UCSB should be prepared to address in greater detail when the planning process eventually goes forward.
The City appreciates the opportunity to provide these comments to the University. We strongly believe that the LRDP and its underlying DEIR need re-working and re-circulation. The documents are fundamentally flawed. Further consideration needs to be given to what can realistically go forward, in light of finite natural resource capacities, limits upon expanding public works systems, and the tolerances of the community for the tremendous order of magnitude of growth and change envisioned by the LRDP.

In closing, the City would welcome a more constructive relationship with the University than in the past, one that is responsive to the comments and concerns expressed herein. We have nothing but respect for the role the University plays for California and the local assets that are abundant because of its presence. The City is committed to working with the University to resolve information gaps and differences on perspectives and findings, but we will represent the needs, tolerances and interests of our residents and businesses first. Should you have any questions or comments regarding the content of this letter, please contact Mr. Steve Chase, the City’s Director of Planning and Environmental Services. Thank you in advance for your diligent consideration of our comments.

Sincerely,

Michael T. Bennett
Mayor

Cc: Henry T. Yang, Chancellor, UCSB
    Gene Lucas, Executive Vice Chancellor, UCSB
    Mark Fisher AIA, Associate Vice Chancellor for Campus Design & Facilities, UCSB
    Jack Ainsworth, Deputy Director, California Coastal Commission, Ventura Office
    Dan Singer, City Manager, City of Goleta
    Michael Brown, CEO, County of Santa Barbara
    James Armstrong, City Manager, City of Santa Barbara
    Kamil Azoury, General Manager, Goleta Sanitary District
    Kevin Walsh, General Manager, Goleta Water District
Response to Comment A-11-1. The LRDP’s proposed growth rate of 1% per year is similar to the overall growth rate projected by SBCAG for Santa Barbara County (including the City of Goleta). University growth would be part of this regional growth; faculty, staff, students, and visitors are also area residents, customers, and citizens of the County and its cities.

Response to Comment A-11-2. A recirculated Draft EIR (“RDEIR”) was prepared and submitted for public review.

Response to Comment A-11-3. The LRDP proposes and the EIR analyzes the environmental impacts of the maximum projected enrollment and associated population levels. Additional enrollment beyond that considered in the EIR would require appropriate subsequent environmental review. With regard to the relationship between enrollment increases and new on-campus housing, please see response to comment A-10-1.

Response to Comment A-11-4. The amount of academic and support space does not determine the maximum enrollment considered in the LRDP. Also please see responses to comments A-10-11 and A-17-PD-5.

Response to Comment A-11-5. The amount of additional recreation land is not directly proportional to the number of faculty, staff, or students. Increased opportunities for recreation, as suggested in the California Coastal Act, are proposed to be accommodated by additional land as well as facility expansions (e.g., pools and courts), program increases and changes, and more intensive use of existing facilities. UC Santa Barbara has the most extensive and diverse collection of athletic and recreational facilities and programs in Santa Barbara County, which the LRDP proposes to expand and improve. Please see response to comment A-17-REC-3.

Response to Comment A-11-6. Traffic impacts to off-campus streets and highways are analyzed in Section 4.13 of the RDEIR. Please see response to comment A-4-15.

Response to Comment A-11-7. Impact to law enforcement and fire protection are analyzed in Section 4.11 of the DEIR.

Response to Comment A-11-8. The size, bulk, scale, density, and height of proposed University housing adjacent to the Storke Ranch residential tract, shown in section D of the LRDP, is compatible with neighborhood development, and as proposed is a substantial improvement over the quality of the existing Storke Campus development. Please refer to the EIR for environmental impacts of the LRDP. Noise impacts are analyzed in Section 4.9 of the EIR, impacts from light, glare, and height are analyzed in Section 4.1, and traffic impacts are analyzed in Section 4.13.

Response to Comment A-11-9. Figure B.5 of the LRDP, and Figure 4.13-1 of the EIR show area roads and highways surrounding the University, including those traversing Goleta and unincorporated areas. El Collegio Road which provides access to the Main, Storke, and West Campuses does not traverse the City of Goleta. Please see response to comment A-11-6.

The relative “quality” of more dense compared to less dense campus development is not an environmental issue unless it is related to the analyses in the resource sections of the EIR. Please see response to comment A-11-10.
Response to Comment A-11-10. This is not a comment on an environmental issue, and also is incorrect. The University does not agree that “green field” development is necessarily less expensive than redevelopment and infill development, and the commenter has provided no evidence in support of its comment.

Because the 2010 LRDP assumes higher rates of on-campus housing than the City’s 2006 General Plan/Local Coastal Plan, the impacts of housing off campus would be reduced from what the City considered.

Response to Comment A-11-11. The text of the LRDP will incorporate the comment.

Response to Comment A-11-12. The last sentence of the first paragraph on page B.4 has been revised to read “…where the University contributes to traffic on local streets and Fairview Avenue.”

Response to Comment A-11-13. Not all of the 652-acres of the Ellwood-Devereux Coast referred to in the LRDP text was acquired by the City of Goleta in 2005. Figure B.2 from the Open Space and Habitat Management Plan refers to land ownership at the time the Management Plan was being prepared, not subsequent changes to or current land ownership. Nevertheless, the second paragraph on page B.4 of the LRDP has been revised to conclude with the following sentence: “The City of Goleta in 2005 acquired ownership of the Ellwood Mesa (Sperling Preserve) property and lands traded to SB Development Partnership (Comstock Homes) that were formerly part of the SB Shores Park.”

Response to Comment A-11-14. The comment is correct. The Isla Vista Master Plan remains pending before the California Coastal Commission, however, and has not yet been finally approved. The County recently submitted additional data that is being reviewed for completion.3

Response to Comment A-11-15. Both statements are correct. The text in the LRDP refers to the average parking rates across all Main Campus Parking Designations. Table B.7 refers to the peak parking rates within each designation (during the typically representative 2-week sample period).

Response to Comment A-11-16. The LRDP presents data on how all students travel to campus by mode. Students living in different areas of the region commute at different rates using different modes of travel. The presentation of the data in this way properly reflects the location of most student residents (Isla Vista) and the predominate form of travel (bicycle). For alternative transportation programs please see page E.6 of the LRDP and the policies on pages E.11 and E.12.

Response to Comment A-11-17. The LRDP reflects the University’s perspective that a broad approach should be used to incorporate environmentally sustainable practices and materials into development projects and campus operations, rather than achieved solely by any single method such as reducing ASF per student.

Response to Comment A-11-18. The LRDP includes 12 years of comparative enrollment levels as context for the proposed Plan. The year 1990 was not selected as the base period because the 1990 LRDP has had more than 15 major amendments since 1990 with the most recent amendment in 2009.

Response to Comment A-11-19. The text on LRDP page C.3, 4th paragraph, last sentence has been amended as follows: “… and Goleta.”

Response to Comment A-11-20. Please refer to responses to comments A-10-1, A-10-11, and A-12-3 for a discussion of the relationship between space and enrollment. For an explanation of the purposes of the proposed enrollment increases and associated space needs, please refer to the 2006-2025 Strategic Academic Plan (discussed in DEIR Section 3.5.1) and pages C.2 through C.5 of the LRDP. See DEIR Chapter 3.0.

3 Telephone conversation with Amber Tysor, Coastal Analyst, California Coastal Commission, South Central Coast Area Office (June 7, 2010).
**Response to Comment A-11-21.** The 2010 LRDP will better reflect the values discussed on LRDP page C.7 by providing an over-arching long-range plan for all campus areas. The 2010 LRDP is larger in scope and more detailed in how it will achieve these goals than the 1990 LRDP. For example, by thoroughly encompassing all areas of campus, the 2010 LRDP ensures the orderly expansion and strengthening of the greensward to provide species migration and continuous habitat. Continued project-by-project development will not support a clear campus-wide vision for enhancement of natural resources as well as the proposed, comprehensive 2010 LRDP.

**Response to Comment A-11-22.** The University has established the importance of substantially increasing the amount of on-campus housing as a “worthy goal” by making a “major commitment to campus housing” as indicated in the proposed LRDP. This is a particularly important priority in an era of scarce financial resources and could not be achieved at all without the changes proposed in the LRDP. However likely it is that 100% of the Plan will be implemented by 2025, the University has prepared a long-range plan to allow for its development, considered the environmental consequences of the Plan, and initiate a public process for consultation with the University’s many communities about the Plan and its impacts. The pace of enrollment increases and housing development may vary from year-to-year which will be reflected in subsequent plans, projects, and environmental reviews as required by law and University policy. Please see response to comments A-10-1 and A-10-2.

**Response to Comment A-11-23.** Please refer to response to comment A-11-5.

**Response to Comment A-11-24.** Coal Oil Point and Coal Oil Point Reserve/ESHA will continue to be protected open space under the 2010 LRDP. (See LRDP Figure D.2.) Improvements to Campus non-developed spaces are to be achieved by adherence to the LRDP, implementation of mitigation measures, and through habitat restoration and enhancement projects such as those described on pages H.4 through H.7 of the LRDP.

**Response to Comment A-11-25.** Please see responses to comments A-11-15 and A-11-17.


**Response to Comment A-11-27.** Please see response to comment A-11-8. Also, the building/property setbacks and building heights are the same for the adjacent University and Storke Ranch residences, and therefore not out of character for the existing neighborhood.

**Response to Comment A-11-28.** Please refer to responses to comments A-11-6 and A-4-15. Regarding financial assistance to local government for traffic improvements, please see Master Response – Traffic Fair Share Mitigation.

**Response to Comment A-11-29.** Please see response to comment A-11-22. Proposed housing projects not located on the Main Campus (where existing parking can be used) provide parking for the residents, visitors, and staff as an integral part of the neighborhood’s development. The LRDP proposes and currently provides sufficient parking to accommodate commuter use. There is no data to indicate a substantial amount of University commuter parking in the City of Goleta, primarily because of the distance of the City from the University. For impacts of University related parking on Isla Vista please see EIR Section 4.13.

**Response to Comment A-11-30.** Increased parking ratios used for the most recently constructed on-campus housing project (San Clemente Villages), which were based on local and industry standards, have resulted in substantial increases in parking vacancy rates. Residential parking rates in the LRDP and EIR are based on actual use from University housing projects.
Response to Comment A-11-31. LRDP, page E.9, fourth paragraph refers to “more public access to the coast” in the area adjacent to North and West Campus, not “coastal access parking” (emphasis added). The University has proposed and the California Coastal Commission has approved specifically dedicated coastal access parking on North Campus for the use of the public and those who live nearby. The University does not provide free parking to any users, and protects parking availability for coastal access by meters that regulate the time, place, and price of parking so that it is more inconvenient and expensive for commuters than other more appropriate options. Other jurisdictions subsidize parking, coastal and otherwise, in a variety of other ways.

Response to Comment A-11-32. Page E.9, paragraph 6, first sentence has been revised to read as follows:

The University will maintain and enhance public access to the coast though two primary east-west trails—the Juan Bautista de Anza and Coastal Trails (which connect to trails traversing the City of Goleta’s Sperling Preserve and Santa Barbara Shores Park) […]

Response to Comment A-11-33. The wording of LRDP Policy Trans-4 is verbatim from a California Coastal Commission requirement for North and West Campus housing and open space developments. Policy Trans-10 is a simple restatement of the statutory language of the Coastal Act. Any restrictive, vague, or open-ended effects, therefore, are those intended by the Agency and Legislature, not the University.

Response to Comment A-11-34. The numbers of on-campus residents are shown in Table A.1 of the LRDP, and regional growth projects are shown in RDEIR Table 4.10-10. Coastal access facilities and proposed improvements are shown on Figure E.3 of the LRDP. Off-campus recreational facilities, including beaches, are discussed in DEIR Section 4.12.1.3. The impact of the 2010 LRDP on off-campus recreational facilities, including beaches and coastal access points, is analyzed in Impacts REC-2, REC-3 and cumulative impacts are analyzed in Impact REC-4. The proposed improvements and policies found in the Coastal Act sections of the LRDP are intended to reduce degradation of coastal resources and increase opportunities for coastal access. Increased use of local and regional coastal access facilities and routes is likely.

Comment noted as regarding the removal of the Ellwood Marine Terminal.

Response to Comment A-11-35. The LRDP does not propose or anticipate removal of eucalyptus trees that are part of the “Ellwood Complex.”


Response to Comment A-11-37. Please see Master Response – Water Supply section II.

Response to Comment A-11-38. Permitting for the decommissioning of the Ellwood Marine Terminal is the obligation of the leaseholder and the County of Santa Barbara. The University has repeatedly advised the leaseholder to initiate all permitting and approval processes with local government and state agencies in compliance with the terms of the lease.

Response to Comment A-11-39. A mitigation monitoring program for the LRDP EIR mitigation measures will be adopted by the University and is included in the Final EIR. Additional monitoring or status reports are available in the annual reports to Legislature regarding mitigation of off-campus impacts as required by the supplemental budget language adopted by the Legislature in conjunction with the 2007-08 Budget Act. The Act requires the University to provide detailed reports on the status of implementation of mitigation measures for significant off-campus impacts of current projects for five years. The report is due to the Legislature on March 1 of each year.

Response to Comment A-11-40. Please see response to comment A-11-39 with regard to monitoring. The Office of Institutional Research and Planning (http://bap.ucsb.edu/IR/index.html) and Community
Housing Office (http://www.housing.ucsb.edu/choices/cho-general-info.htm) report on annual enrollment and housing rates, respectively.

Regarding the City of Goleta schools and social services, Impact PUB-4 analyzes the impact of the 2010 LRDP on schools.
June 23, 2008

Ms. Alissa Hummer
Campus Planning & Design
Facilities Management
c/o Vision 2025
UC Santa Barbara, CA 93106-1030

Re: DEIR for the 2008 Long Range Development Plan

Dear Ms. Hummer:

The City of Goleta has reviewed the Draft Environmental Impact Report (DEIR) on the University’s Draft Vision 2025 Long Range Development Plan (LRDP) and would like to provide the comments set forth in this letter. By separate letter, the City has provided comments on the LRDP. That letter is attached, and by this reference each of the items listed in the letter are incorporated herein as comments on the DEIR.

Bottom-line, the City believes that the DEIR needs considerable re-working, followed by recirculation for further public review and comment. The reasons are explained in detail below.

Chapter 1.0 - Introduction

1. Page 1.0-5. The 3rd sentence in Section 1.5 reads “It (the LRDP) does not directly commit the University to specific projects, funding plans, or construction schedules.” Once approved, however, the new LRDP would authorize the University to proceed with the stated increases in students, faculty, and staff. The proposal in the LRDP to accommodate all future increases in students, faculty, and staff in new on-campus housing, rather than in local communities, has the effect of substantially understating what otherwise would be significant and unmitigated environmental impacts if on-campus housing development does not keep pace with increases in students, faculty, and staff. The quoted statement expressly acknowledges that the University will not be obligated to the construction projects identified in the draft LRDP, including the housing construction. The effect would be to shift residential accommodations to off-campus locations, thereby commensurately increasing environmental effects in local communities such as Goleta. Although the goal of providing all housing on-campus is a good one, the DEIR needs to be revised to reflect a more
likely (and worst-case) scenario. That scenario involves less than 100% of all future increases accommodated in on-campus housing and/or a set of supplemental mitigation measures that would be triggered whenever it is determined by a monitoring system that on-campus housing development has not kept pace with increases in students, faculty, or staff. The City believes that the supplemental mitigation measures need to be binding obligations. Absent that control mechanism, the community impacts would have to be reclassified throughout the DEIR as significant and unmitigated.

Chapter 2.0 – Summary of Environmental Impacts and Mitigation Measures

2. Page 2.0-1. The first “bullet” under project description states that the project includes an additional 2.5 million gross square feet (GSF) of academic and research facilities, whereas the Draft LRDP refers to an increase of 1.8 million assignable square feet (ASF). This data needs to be consistent with similar data in Table 3.0-6. Many impacts should be analyzed in terms of gross square feet rather than ASF. It is not clear that the impacts identified in the DEIR have in fact been based on additional GSF. In preparing its EIRs and computing impact mitigation fees, the City of Goleta uses GSF as the metric in calculations. The DEIR under-estimates impacts to the extent that ASF is used.

3. Page 2.0-2. Under “Project Objectives,” the stated objectives are not sufficiently clear or measurable. For example, the objectives do not address the proposal to substantially increase the amount of building space per student, from 136 ASF per existing student as of 2007 to 355 ASF per new student. This may be intended to address a perceived short-fall in the amount of existing space on a per capita basis. This appears to be a major but unstated objective of the project.

4. Pages 2.0-4 through 2.0-37. Changes to the table titled “Summary of Impacts and Mitigations” should be made based on the City’s comments on the various detailed sections of the DEIR as stated in subsequent sections of this letter. These are not repeated here.

5. Various Maps. The various map figures in this and subsequent sections of the DEIR do not clearly show the entire boundary of the University with the cities of Goleta and Santa Barbara. Nor do they show the county “islands” in Isla Vista and in the North Campus (Ocean Meadows area).

6. Page 3.0-10. Table 3.0-2, “Existing Assignable Square Feet by Program” should be revised to also include “Gross Square Feet by Program” since that is the appropriate metric to employ in calculating future environmental impacts of the proposed LRDP. The project description summary noted above (in item 2) uses the GSF metric.

7. Page 3.0-11. For clarity, Table 3.0-3 should be revised to include subtotals for student beds, student family housing units, faculty units, and staff units.
8. **Page 3.0-13.** Under “Parking and Service Access,” the discussion of “public coastal access parking” should identify the number of public spaces the university provides free (without meters or parking fees).

9. **Page 3.0-19.** It appears from the data in Table 3.0-4, “Student Enrollment 1995-2006,” that the University has exceeded its enrollment cap stated in the 1990 LRDP. That issue needs further clarification because it has been our understanding that UCSB has been proactive in its self regulation of the cap. The impact analysis sections need to address whether the proposed new student cap will be mandatory and binding or if it can be exceeded by an allowable factor. If it can be exceeded, the impact analysis sections need to further elucidate the additional impacts and mitigations that would be required in the event the cap is exceeded.

10. **Page 3.0-25.** The “Project Objectives” stated in Section 3.6 are insufficiently precise to be measurable and progress verified. Objective 3.b., for example, states that the objective is to build up to 1,800 units, not that the objective is to build 100% of the units on-campus that are needed for future increases in faculty and staff. The objective as stated could be considered fulfilled if only 10% are accommodated in new on-campus housing.

11. **Page 3.0-28 through 3.0-30.** The land-use data within the captions of the text do not match the data in the table (Table 3.0-7) and should be corrected to be consistent with the table. For example, recreation data is 81 acres in the table but 83 acres in the caption, academic is 203 in the table but 197 in the caption, and so on.

12. **Page 3.0-34.** The “Housing Program” text needs to explain the number of existing housing units and beds that are proposed to be demolished to make way for new construction as a basis for clarifying the proposed total (gross) number of new housing units and beds to be constructed. The use of the word “net” in the text is unconventional and misleading. The gross number proposed to be constructed less the number proposed to be demolished is the net increase.

13. **Page 3.0-39.** Table 3.0-10 does not identify all of the off-campus roadway improvements that would be needed to accommodate the proposed University growth. The rationale for inclusion of some off-campus improvements (such as Phelps Road extension) but not others is not made clear.

14. **Page 3.0-39.** The information in the text of the “Alternative Transportation Modes” section needs to clearly distinguish between students that live on-campus and in Isla Vista from those that are longer-distance commuters. The text is evasive when considering longer-distance commuters, (i.e. those living in Goleta, Santa Barbara, etc), but the data show that 2/3 of these commute in single-occupant vehicles, and only 1/3 use the bus, carpool, or use other alternative transportation. The picture presented in the text is skewed because of the size of the on-campus and Isla Vista populations.

15. **Page 3.0-44.** The description of Coastal Access is not sufficiently precise, and needs to specifically list and detail the proposed new improvements. This is particularly
important due to the very large increase in population proposed to be provided new on-campus housing (likely well over 8,000 persons when families of faculty and staff are included).

Chapter 4.0: Environmental Setting, Impacts, and Mitigation

16. **Page 4.0-4.** The statements under “Significant and Unavoidable” ignore the other option available under CEQA, which is to alter or modify the project itself as a means of lessening impacts such that they would fall below the applicable thresholds of significance. For example, such alterations or modifications of the proposed project could be reductions of the proposed increases in students, faculty, and staff AND/OR reductions in the amount of GSF/ASF proposed so that the proposed per-capita amounts do not exceed the existing per capita amounts by as much. If potential project modifications/revisions are not selected, the DEIR should address the reasons why such alterations or modifications of the proposed project have been determined to be infeasible.

17. **Page 4.1-37.** The analysis of visual/aesthetic impacts of proposed development on the Storke campus area is inadequate in that it fails to address impacts that would be experienced by residents of the adjacent Storke Ranch PUD in Goleta. This needs to be included either as a separate impact or included within impact AES-4.

18. **Pages 4.1-38 and -39.** The evaluation of visual and aesthetic impacts of development of the north and west campus areas fails to address the impacts experienced by users of the open space areas, including the Sperling Preserve in Goleta. Additional development and lighting visible from open space areas has the potential to degrade and adversely impact the quality of the open space experience by users of these areas compared to the existing condition.

19. **All Aesthetics Impacts.** The proposed mitigation measures are inadequate in that they are excessively vague and lack measurable means to reduce impacts to levels where impacts would be insignificant. The City believes that measurable and binding mitigations need to be included.

20. **Pages 4.10-1 and thereafter.** The DEIR does not adequately identify the total additional on-campus populations that are proposed to be accommodated by the LRDP, particularly the component of families of married students, faculty, and staff (i.e. inclusive of spouses and children). It is this total additional on-campus population – not just the additional students, faculty, and staff – that will generate environmental impacts.

21. **Page 4.10-14 and thereafter.** The SBCAG regional forecasts of housing and population need to be updated to include the most recent (2008) projections and allocations of regional housing needs. Relatively more growth is allocated to Santa Barbara and less to Goleta compared to the SBCAG Forecast 2000.

22. **Page 4.10-25.** “Impact POP-1” The conclusion stated in Impact POP-1 of no population impact in the off-campus area is only correct if the on-campus housing
units proposed are in fact constructed at the pace necessary to accommodate the increases in students, faculty and staff. As noted above, the DEIR states that the University is not subject to a binding obligation to construct any of the proposed facilities in the LRPD. The City believes that unless there is a measurable, binding, and enforceable mitigation measure to assure that expansions of academic and support space (and increases in the numbers of students, faculty, and staff) do not outpace on-campus housing development, there is the likelihood of significant adverse unmitigated impacts on adjacent communities, including Goleta. This would be due to the fact that those not housed on-campus would by necessity have to secure off-campus housing in the communities. The necessary mitigation appears to be feasible; that is, it would be possible to suspend further increases in the numbers of students, faculty, and staff until sufficient numbers of new housing units/beds are constructed.

23. Pages 4.10-25 to -27. The mitigation proposed (POP-2A) is inadequate in that it does not create a binding obligation to actually balance new on-campus housing with future increases in students, faculty, and staff. It merely says that the University will “work towards” achieving such balance. No measurable criteria are set forth to guide conclusions about “sufficient progress.” If the mitigation is not measurable and binding, the conclusion that the residual impact is “less than significant” is not valid, and the residual impacts would in fact remain significant.

24. Pages 4.10-27 through -29. The DEIR does not adequately address the indirect impacts of the proposed project. In the absence of other analytical data, the DEIR should use the results of the study performed by the UCSB Economic Forecast Project in 2007. The indirect effects include the increased housing demand in the region that is caused by the increased jobs and population associated with the multiplier effect in the local economy of the increases in students and on-campus jobs proposed by the Draft LRDP. It is of great importance to provide specific quantitative estimates of these indirect effects of the proposed growth at the University. Total impacts on many environmental resources will be greater when both direct and indirect impacts are evaluated.

25. Page 4.10-29. Section 4.10.2.4 does not adequately address cumulative impacts of the project. Cumulative impacts should include impacts of other non-university related growth planned in the communities (including Goleta and Santa Barbara) plus the impacts of the proposed university growth. Not all (or necessarily the major portion) of the growth planned in Goleta and other community areas is directly or indirectly related to the proposed university growth.

26. Page 4.11-15. Impact PUB-1 does not adequately address the on-campus law enforcement impacts in that it fails to acknowledge the total on-campus population increase, inclusive of spouses and children of the additional faculty, staff, and married students that are proposed to be accommodated in new on-campus housing. The impact would be significant without mitigation. Mitigation would be necessary in terms of increasing the number of campus police commensurate with the total population increase. No mitigation measure is identified and without an increase in law enforcement personnel there could be a significant unmitigated impact.
27. **Page 4.11-15.** Impact PUB-2. To the extent that the University fails to construct new on-campus housing commensurate with increases in students, faculty, and staff, there will be unmitigated impacts on law enforcement services in the community areas, including Goleta as well as Isla Vista. Without a measurable and binding mitigation to constrain future increases in students, faculty, and staff to just the amounts accommodated by new on-campus housing, such adverse and unmitigated impacts will occur and are not addressed in the DEIR. Impacts will be experienced in communities even if all growth is accommodated in new on-campus housing, since the additional population ventures into the community for many services and activities. Additional mitigation measures are necessary to respond to this impact.

28. **Pages 4.11-16 to -18.** Impact PUB-3. People, more so than buildable space, are the demand factor for fire protection services (i.e., medical emergencies, traffic accidents, structural and brush fires, and various rescues). Without a measurable and binding mitigation to match and pace future increases in students, faculty and staff, there will be unmitigated impacts on fire protection services in the community areas, particularly in Goleta and Isla Vista. Additional mitigation measures are necessary to respond to this impact.

29. **Page 4.11-22.** Cumulative Impact PUB-6. This impact analysis is inadequate in that it fails to address the community impacts noted above in items 27 and 28 combined with the impacts of non-university related planned growth in the communities.

30. **Page 4.12-24.** Impact REC-1. The data presented in the DEIR on land designated for Recreation by the LRDP is inconsistent with data in the Draft LRDP itself. Tables B.1 and D.1 in the Draft LRDP show the number of acres designated for recreation increasing from 77 existing to 81 in the future by 2025, an increase of 4 acres instead of the 6 stated in the DEIR. The analysis of impacts is inadequate in that the increase in land area for recreation is only 5%, whereas the Draft LRDP proposes increases of 25% in the number of students and 37% in the number of faculty and staff. If measured in terms of on-campus population, the percentage increases for those proposed to be accommodated are even higher, since relatively small fractions of existing students, faculty and staff live on campus. The percentages would also be even higher if the total proposed increase in on-campus population, inclusive of spouses and children of additional married students, faculty, and staff are included. By all measures, it appears that the amount of land proposed for recreation is insufficient to accommodate the future on-campus demand or need for such recreation land. Failure to provide additional recreation land commensurate with the on-campus population increase will result in a significant and unmitigated impact. In addition, failure to provide sufficient recreation land on-campus to accommodate the planned population growth will result in adverse impacts on Goleta's recreation facilities, through crowding and over-use of community recreation facilities and land.

31. **Page 4.12-26.** Impact REC-2. The additional proposed coastal recreation facilities (active and passive) are not sufficient to accommodate the total proposed increase in on-campus population, inclusive of spouses and children of married students, faculty, and staff (see also item 30 above and attached City comments on the LRDP). As a result, there could be overuse of existing and planned on-campus coastal recreation
facilities, as well as at Haskell's Beach, Ellwood Mesa and Goleta Beach. These impacts need to be identified and appropriate mitigation measures included in the EIR.

32. Page 4.12-27. Impact REC-3. The analysis of impact is inadequate in that it fails to take into account increased traffic and congestion on roads that provide vehicular access to beaches and other coastal resources, the insufficient proposed increases in public coastal access parking spaces, and likely overuse of coastal access points — which also could lead to degradation of the quality of coastal resources. For example, student parking along the west end of the Goleta Beach parking lot has been a mainstay. These impacts may be significant unless additional mitigation measures are included. The DEIR fails to take into account likely spillover of demand for beaches and other coastal recreation resources into Goleta and other adjacent community areas.


34. The traffic analysis presented in section 4.13 of the DEIR is based upon a traffic model that was derived from the City of Goleta’s calibrated traffic model that was developed for the City of Goleta’s General Plan. The use of the City’s calibrated traffic model to determine future traffic impacts associated with the LRDP is appropriate and supported by the City. However upon circulation, the DEIR did not include information relating to the assumptions and methodology used in developing the LRDP traffic model on which the entire traffic analysis is based. Typically a traffic model report or memorandum that documents the methodology and assumptions used in creation of the traffic model is generated by the traffic modeling firm. The traffic model report is vital to understanding how the model results were obtained. Such a report was finally submitted to the City on June 16th months after the DEIR was officially circulated for comments. This precluded the City from a more detailed review of the LRDP traffic forecasts – specifically how the traffic projections affect operations at specific locations (i.e., intersections and roadways) within the City.

35. In the absence of the traffic model report, the City reviewed the LRDP traffic model files and compared them to the original calibrated model files to determine what changes to the City’s calibrated model were made to develop the LRDP model. This included a comparison of several key traffic model features including, but not limited to, traffic analysis zones (TAZs), land use tables and trip generation tables. The comparison revealed some changes to the model that would be expected and others that are not be easily explained. In particular, the changes to the land use and trip generation tables directly affect the amount of vehicle trips generated and the associated impacts of those trips. Given that changes to these model parameters can potentially compromise the integrity of the model’s calibration, a careful examination of how the changes affected the baseline performance of the City’s calibrated model is needed prior to its application for generating future year traffic forecasts. Upon the late submittal of the traffic model report, it was determined that a validation exercise was performed as part of the traffic modeling effort for the LRDP. The City is concerned however, that the LRDP model validation was limited to specific UCSB campus traffic ingress egress characteristics and a generalized model wide statistical root mean square diagnostic test – which was “padded” by the addition of 62 count locations in and adjacent to the UCSB campus. The LRDP model validation test comprised of 73 segment links (147 counting both directions of travel) of which 42 (84 counting both directions of travel) were included in the City’s original model
validation effort. A total of 31 additional segments (62 counting both directions of travel) in the vicinity of UCSB was added to the validation analysis. Although the LRDP baseline model met standard statistical precision requirements analyzing all 73 segments, the validation analysis should also report the results based on only the link segments used as part of the City’s original model validation effort. This will allow an apples-to-apples comparison of baseline model performance. Given the greater accuracy on links in and adjacent to campus, the addition of 31 segments statistically “corrects” areas where the model performing poorly. For instance, segments of Highway 101, Hollister Avenue, Los Carneros, Fairview, Calle Real do not meet minimum allowable error tolerance levels in the LRDP baseline model while several other high profile City roadways such as Storke Avenue fall barely within acceptable error tolerance levels. The validation exercise should include screen-line tests to gauge the accuracy of the model to predict traffic flows on City roadways where significant traffic impacts have been identified (included but not limited to Storke, Los Carneros, Fairview and Calle Real). Documentation of the validation analysis performed for the LRDP baseline model should also indicate where post-2005 traffic counts performed by UCSB were used in lieu of the City’s model validation baseline counts. For instance, on southbound Storke Avenue north of Phelps Road, the LRDP validation count is 850 vph versus the City’s 2005 traffic count of 760. Using the 850 count provides a better validation result for this link. There are also inconsistencies between the UCSB Campus ingress egress validation results presented in the body of the traffic model report versus the validation results presented in Attachment H of the traffic model report. For example, in-out traffic counts reported for El Colegio – Campus West Gate differ between these validation exercises. Based on the City’s validation count at this location, the LRDP baseline model is under-predicting traffic at the West Gate of Campus by over 200 PM peak hour trips. In conclusion, the City is concerned that the baseline validation performed for the LRDP did not go far enough in terms of trip generation changes, isolating model performance within the City, volume screen-line analyses and documentation.

36. The empirical justification and data source used to modify the peak hour trip generation rates for UCSB Students, UCSB Faculty & Staff, Student Housing Off-Campus and Student Housing On-Campus are not documented in the DEIR. A detailed description of, and the basis for, these traffic model parameter modifications performed on the City’s calibrated travel model is needed.

37. The data presented in Section 4.10 Population and Housing of the DEIR cites the following UC-Affiliated Populations information for the 2006-07 academic year at UCSB:

- 21,082 Total Students (total enrollment irrespective of full or part time status)
- 20,556 Full Time Equivalent (students enrolled for at least three quarters)
- 9,500 Faculty and Staff (includes full and part time employees)
- 6,000 Faculty and Staff Full Time Equivalent

The source of this information is the annual Campus Profiles prepared by the Office of Institutional Research and Planning at UCSB. As stated in the DEIR and in accordance with the UC CEQA Handbook, total students (full and part time) and total employees (full and part time) are used for CEQA and the DEIR to analyze significant effects on the environment.
A summary comparison of the UCSB LRDP model land use inputs relative to the City’s calibrated model and published UCSB data is shown below. Significant land use discrepancies between the modeling performed for the LRDP DEIR and the City’s 2005 baseline exist for two of three generalized land use categories germane to UCSB travel demand: UCSB students and UCSB faculty and staff. Comparison of the number of dwelling units is not possible since beds not units was used as the trip parameter for the new land use categories developed for the LRDP.

<table>
<thead>
<tr>
<th>Land Use Parameter</th>
<th>UCSB IRP 2006-07</th>
<th>City Calibrated Model Baseline 2005</th>
<th>LRDP Baseline 2005-06</th>
<th>City Model General Plan 2030</th>
<th>LRDP No-Project 2030</th>
<th>LRDP Final 2030</th>
</tr>
</thead>
<tbody>
<tr>
<td>UCSB Students</td>
<td>21,982</td>
<td>19,039</td>
<td>16,530</td>
<td>25,000</td>
<td>16,530</td>
<td>18,046</td>
</tr>
<tr>
<td>UCSB Employees</td>
<td>9,500</td>
<td>9,529</td>
<td>4,689</td>
<td>11,400</td>
<td>4,685</td>
<td>6,385</td>
</tr>
</tbody>
</table>

1. UCSB reflects baseline levels (2006-07) with all other areas reflecting 2030 conditions.
2. Reflects all housing dwelling units (SFDU, MFDU, Student Housing, Student Family Housing, Faculty Housing)
3. n/a Institutional Research and Planning only tracks University owned student and faculty housing.
4. Inputs reflect all model analysis zones (TAZ’s) related to UCSB functions – including Isla Vista

The LRDP No-Project and LRDP Final modeled land use assumptions reflect roughly half the UCSB employment and roughly 3,000 – 5,000 less enrolled students that the City’s 2005 baseline and UCSB’s own 2006-07 Campus Profile figures. The effect of truncating off-campus students from the analysis and somehow reflecting them in the Student Housing land use category as described in the traffic model report requires explanation. Truncating 4,843 UCSB employees by claiming they are graduate students living on campus and are therefore already reflected in the student land use category is incorrect. Graduate students are reflected as UCSB students in the travel model – not UCSB employees. These land use assumption changes requires explanation in terms of their impact on the trip generation results. Reducing the number of students and employees as shown above result in fewer trips and less traffic impacts. The City believes that reducing the number of students and employees will result in understating the potential traffic impacts associated with the project.

38. An analysis of the UCSB LRDP model trip generation estimates for all model analysis zones with UCSB affiliated functions reveal large discrepancies from past calibrated modeling efforts performed by the City of Goleta. The LRPD 2005/06 baseline generates 2,844 PM peak hour trips less than the City’s calibrated 2005 baseline model (4,201 trips vs. 7,045 trips). The LRDP 2030 Final is projected to generate 926 and 2,182 PM peak hour trips less that the City’s 2005 Baseline and 2030 General Plan models respectively. This does not appear to be a reasonable forecast of trip generation.

### Trip Generation in UCSB Related Model Traffic Analysis Zones

<table>
<thead>
<tr>
<th>Vehicle Trip Definition</th>
<th>City Calibrated Baseline 2005</th>
<th>LRDP Baseline 2005-06</th>
<th>City Model General Plan 2030</th>
<th>LRDP No-Project 2030</th>
<th>LRDP Final 2030</th>
</tr>
</thead>
<tbody>
<tr>
<td>Trip Origins</td>
<td>4,150</td>
<td>3898</td>
<td>4,859</td>
<td>4,438</td>
<td>5,562</td>
</tr>
<tr>
<td>Trip Destinations</td>
<td>3,532</td>
<td>3077</td>
<td>4,171</td>
<td>3,694</td>
<td>4,836</td>
</tr>
<tr>
<td>Internal Trips</td>
<td>2,865</td>
<td>303</td>
<td>3,442</td>
<td>453</td>
<td>557</td>
</tr>
<tr>
<td>Total Trip Production²</td>
<td>7045</td>
<td>4,201</td>
<td>8,301</td>
<td>4,891</td>
<td>6,119</td>
</tr>
</tbody>
</table>

1. No-Project reflects UCSB baseline levels (2006-07) with all other areas reflecting 2030 conditions.
2. Total Trip Production = Trip Origins + Internal trips

39. A review to total trip generation broken out by trip type reveals a significant departure by the UCSB LRDP travel model in the percent of Home Based College (HBC) trips. The City of Goleta’s calibrated 2005 Baseline model estimates a total of 2,873 HBC trips – roughly
6 percent of total trips in the Goleta Valley. Conversely, the LRDP 2005/06 baseline generates 1,453 HBC trips – approximately 3 percent of total trips. As part of its General Plan 2030 forecast, the City forecast HBC trips to grow to 3,399 trips - remaining at approximately 6 percent of total trips. The UCSB LRDP travel model forecasts significantly less HBC trips under both the No-Project and Final LRDP alternatives: 1,719 HBC trips and 1,996 HBC trips respectively. This equates to approximately half the amount of HBC trips forecast by the City’s calibrated 2005 model baseline. The percentage share of HBC trips relative to all other trip types drops from 6% to roughly 3.5%. This represents a significant departure from the calibrated model baseline. These assumed reductions in HBC trips result in reductions in the amount and level of traffic impacts identified in the DEIR. The traffic model memorandum released on June 16, 2008 identify three campus locations that where used in determining the reduced trip generations rates identified above. The City doesn’t believe a survey of three locations provide enough justification to significantly reduce the trip generations rates as proposed. Underestimating the trip generation rates will result in underestimating the traffic impacts associated with the proposed projects.

<table>
<thead>
<tr>
<th>2005 City Baseline Trip Gen</th>
<th>2005 LRDP Baseline Trip Gen</th>
</tr>
</thead>
<tbody>
<tr>
<td>Trip Type</td>
<td>Total</td>
</tr>
<tr>
<td>H-W</td>
<td>1,848.03</td>
</tr>
<tr>
<td>W-H</td>
<td>10,836.33</td>
</tr>
<tr>
<td>H-O</td>
<td>6,632.26</td>
</tr>
<tr>
<td>O-H</td>
<td>7,256.65</td>
</tr>
<tr>
<td>HBC</td>
<td>2,873.22</td>
</tr>
<tr>
<td>NHB</td>
<td>15,104.65</td>
</tr>
<tr>
<td>X-X</td>
<td>3,298.00</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>47,849.13</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>2030 General Plan Trip Gen</th>
<th>2030 LRDP NP Trip Gen</th>
<th>2030 LRDP Final Trip Gen</th>
</tr>
</thead>
<tbody>
<tr>
<td>Trip Type</td>
<td>Inter</td>
<td>%</td>
</tr>
<tr>
<td>H-W</td>
<td>2,219.66</td>
<td>3.81%</td>
</tr>
<tr>
<td>W-H</td>
<td>12,925.25</td>
<td>22.18%</td>
</tr>
<tr>
<td>H-O</td>
<td>8,041.80</td>
<td>13.60%</td>
</tr>
<tr>
<td>O-H</td>
<td>8,822.12</td>
<td>15.14%</td>
</tr>
<tr>
<td>HBC</td>
<td>3,399.23</td>
<td>5.83%</td>
</tr>
<tr>
<td>NHB</td>
<td>16,154.75</td>
<td>31.15%</td>
</tr>
<tr>
<td>X-X</td>
<td>4,711.00</td>
<td>8.08%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>58,273.81</strong></td>
<td><strong>1.00</strong></td>
</tr>
</tbody>
</table>

The reduction in trip generation rates along with the reduction in students and employees identified in comment number 37 above draws into question the overall validity of the traffic impacts identified in the DEIR.

Consistency of LRDP forecasted PM peak hour 2030 roadway volumes to forecasted City General Plan 2030 roadway volumes are shown in the table below. Comparing the LRDP No-Project relative to the City’s General Plan analysis, significant PM peak hour volume differences result at key locations within the City. Of most concern, the No Project analysis projects approximately 120-250 more peak hour trips northbound on Storke/Glen Annie. Under the LRDP Final Alternative, forecast PM peak hour trips exceeds the City’s General Plan forecasts (GP-1 Forecast – does not reflect regional roadway improvements) – indicating significant impacts at several key locations. Conversely, under the LRDP Final Mitigated Alternative, forecast PM peak hour trips shows significantly less PM peak hour traffic than the City’s General Plan (GP-7 Forecast – reflects regional roadway
improvements) forecasts. These PM peak hour volume reductions are significant and suggest that the modifications made to the City’s model as described above result in significantly less forecasted traffic on key City facilities. Without any information and/or documentation on the LRDP traffic model it appears that the DEIR may be underestimating the traffic impacts associated with the proposed project.

<table>
<thead>
<tr>
<th>Roadway Segment</th>
<th>LRDP No-Project vs. City GP-1 Forecast</th>
<th>LRPD Final vs. City GP-1 Forecast</th>
<th>LRPD Mitigated vs. City GP-7 Forecast</th>
</tr>
</thead>
<tbody>
<tr>
<td>Storke s/o Hollister</td>
<td>+118</td>
<td>+220</td>
<td>-24</td>
</tr>
<tr>
<td></td>
<td>-177</td>
<td>-105</td>
<td>-283</td>
</tr>
<tr>
<td>Storke n/o Hollister</td>
<td>+251</td>
<td>+307</td>
<td>-133</td>
</tr>
<tr>
<td></td>
<td>-134</td>
<td>-76</td>
<td>-364</td>
</tr>
<tr>
<td>Los Carneros s/o Hollister</td>
<td>+48</td>
<td>+143</td>
<td>+86</td>
</tr>
<tr>
<td></td>
<td>-67</td>
<td>+115</td>
<td>-73</td>
</tr>
<tr>
<td>Los Carneros n/o Hollister</td>
<td>+106</td>
<td>+119</td>
<td>-39</td>
</tr>
<tr>
<td></td>
<td>-68</td>
<td>-37</td>
<td>-190</td>
</tr>
<tr>
<td>Fairview s/o Hollister</td>
<td>-42</td>
<td>-17</td>
<td>-74</td>
</tr>
<tr>
<td></td>
<td>+61</td>
<td>+58</td>
<td>-125</td>
</tr>
<tr>
<td>Fairview n/o Hollister</td>
<td>+106</td>
<td>+113</td>
<td>-39</td>
</tr>
<tr>
<td></td>
<td>-68</td>
<td>-37</td>
<td>-190</td>
</tr>
<tr>
<td>SR-217</td>
<td>-368</td>
<td>-78</td>
<td>-377</td>
</tr>
<tr>
<td></td>
<td>-73</td>
<td>+232</td>
<td>+71</td>
</tr>
<tr>
<td>HWY 101 Storke - Los Carneros</td>
<td>+45</td>
<td>-66</td>
<td>-264</td>
</tr>
<tr>
<td></td>
<td>+211</td>
<td>+201</td>
<td>-129</td>
</tr>
<tr>
<td>HWY 101 Los Carneros - Fairview</td>
<td>-117</td>
<td>-104</td>
<td>-479</td>
</tr>
<tr>
<td></td>
<td>+398</td>
<td>+332</td>
<td>-214</td>
</tr>
</tbody>
</table>

41. The DEIR identifies several City intersections where traffic impacts are expected to occur as a result of the LRDP. However there are several key City intersections that are not identified that will likely also be impacted by the proposed project. These include:

- Storke Road/Market Place Dr.
- Los Carneros/Calle Koral
- Fairview/Calle Real
- Patterson/Highway 101 North Bound Ramp
- Patterson/Highway 101 South Bound Ramp

These intersections should also be analyzed. Current and future traffic volumes and associated levels of service along with mitigation measures as required should be included in the DEIR.
42. At the City Council meeting on June 17th, several public comments were received about the Mesa/Los Carneros (existing) and Mesa/Phelps (future) intersections. Particular attention needs to be paid to the operations/level of service of these intersections, in light of the City’s contention that the LRDP traffic model underestimates students/employees per dwelling unit, trip generation rates, trip types, traffic volumes and location and significance of impacted roadways. This is a critical issue.

43. Given the significant and unavoidable future traffic impacts associated with the LRDP, the City requests that UCSB consider additional mitigation strategies that have been proven effective at other campuses in California. One such strategy is prohibiting lower level students from having cars on campus. This and other such alternative strategies should be considered in addition to the mitigation measures identified in the DEIR.

44. As noted above, the DEIR assumes that enrollment growth will occur in pace with the provision of housing to accommodate the additional students and employees. While this is a worthy goal, there is no stated commitment or guarantee that the planned housing will be constructed. If the enrollment increases outpace the construction of housing, the traffic impact will be greater than shown in the DEIR. The DEIR should either:

   a. Be amended to include a more conservative project alternative that accounts for the potential lag or reduction in the amount of housing constructed; or
   b. Be revised to include a measurable and binding mitigation measure to limit future increases in students, faculty, and staff commensurate with future amounts of on-campus housing constructed.

Otherwise, population and traffic will be displaced to adjacent communities such as Goleta. The traffic impacts associated with the potential displacement due to a lag or reduction in housing are not analyzed in the DEIR. Periodic traffic surveys to monitor increases of university-related traffic on city streets/intersections should also be required.

45. The DEIR provides for fair share mitigation fee payments to the City of Goleta. While the City supports this concept, the adequacy of payment of proportionate share will depend on accuracy of the LRDP traffic model which assumes all on-campus housing. As noted above the City doesn’t believe this is realistic. Mitigation fees need to be adjustable (ie pay initial plus supplemental fees) in event on-campus housing does not keep pace with increases in numbers of additional students, faculty, and staff or in event monitored traffic increases exceed the numbers on which the initial proportionate share calculations are based.

46. 4.13-91. Impact Traffic-1. Preparers of DEIR have tried to simplify by providing language in a single place that could be applicable to all three off-campus jurisdictions. This leaves readers unclear as to which streets/intersections are in each jurisdiction. Residual impacts should only be those where additional mitigation efforts are determined to be infeasible, i.e. where reasonable planned improvements are insufficient to provide an acceptable level of service. The university should contribute fees to all improvements which are needed in Goleta to reduce impacts, regardless of whether there remains a residual impact. More mitigation efforts are needed to encourage student and faculty/staff commuters to use bus and van-pools. (only 1/3 presently)
47. The DEIR identifies the extension of Phelps Road to Los Carreros Road as a planned improvement and acknowledges future operational deficiencies at Storke/Phelps and Los Carreros/Phelps intersections. No mitigation is identified at these locations and no mention is made of the potential impacts associated with creating this new roadway link. Public comments provided to the City Council at the June 17th meeting went on to identify particular impacts along this roadway link, including: the Phelps/Bayberry intersection; entrances to the Isla Vista Youth Project Children’s Center; the Capps Learning Center; the Storke Ranch affordable apartments complex; the Storke Ranch RV parking lot; and impacts to the bicycle path that crosses Phelps Road. Mitigation measures at the impacted intersections along with an analysis of all other potential impacts associated with the extension of Phelps Road to Los Carreros should be included in a re-circulated DEIR.

48. Another area of interest came forth from the public comments at the June 17th meeting (public transit) that is of particular concern to the City; yet, its significance is missing from the DEIR and opportunities for substantial improvement (and mitigation) are understated. The DEIR needs to include a public transit plan as an alternative to roadway capacity increases and roadway openings through residential neighborhoods. A long-term transit plan for the campus and surrounding areas is needed. As a case in point, the proposed Mesa/Phelps roadway connection does not reduce traffic impacts below significant levels; whereas, improvements to the local transit system could provide substantial benefit to current and future proposed levels of UCSB students, faculty and staff, Goleta residents and the environment.

49. It only makes sense that, in addition to the cutting edge green building technology envisioned by the LRDP, that UCSB catch-up and advance public transit improvements well beyond the mix of impacts/mitigation under the plan. The strategy expressed elsewhere in this letter that resident under-class students not bring their cars to school resonates strongly with the City Council. It is a widely accepted practice that would compliment the implementation of a public transit plan. Progressive steps such as this one need to be identified and analyzed in a public transit plan and re-circulated DEIR.

50. The City asks the University to further explore vehicular trip routing impacts and the net mitigation that could be achieved through improved public transit. Where those vehicular trips begin and the course taken to and from the University would likely involve City roadways. The mitigation of such needs to go well beyond physical capacity improvements to City roadways. Avoidance of such impacts, through substantial improvements to the public transit system, is an obligatory topic for examination in a re-circulated DEIR. UCSB, the City, County, SBCAG and the Metropolitan Transit District need to engage in meaningful public transit planning relative to the LRDP. The time for such is upon us.

51. The City notes that the LRDP includes planned development in close proximity to existing Storke Ranch homes. Adequate vegetated buffers of at least 100-feet should be incorporated to minimize neighborhood compatibility issues. Density, height, noise, light, glare, size, bulk and scale of University development must be addressed. Please note that public comments provided to the City Council at the June 17th meeting stressed a vegetated buffer setback of at least 300-feet from the Storke Ranch tract. The actual distance will need to be further studied as detailed plans come forward, but some forethought on optional distances should be analyzed and compared within the DEIR.
52. Regarding the Storke Ranch neighborhood, the effects of the proposed housing villages at the Storke Campus and West Campus need to be identified and analyzed. Impacts, mitigations and alternatives to views, air quality, noise, water, transportation, traffic and circulation, light, glare, aesthetics, schools and social services need to be addressed.

53. The Eucalyptus groves on the Storke Campus need to be retained as a part of the vegetated buffer setback from the Storke Ranch tract. These trees serve as active raptor nesting and roosting sites.

54. Off-Campus Parking Impacts. The City believes that there is insufficient parking proposed for new faculty/staff housing areas. Spillover of parking into adjacent community areas could occur if unmitigated. Monitoring of parking usage in new family housing areas is needed as part of that mitigation. There should be a requirement to construct supplemental parking if demand exceeds supply. This should be a mandatory mitigation.

55. Water Supply. The Goleta Water District, in its urban water management plan of 2005 analyzed water availability from Lake Cachuma, state water system, ground water basin storage, as well as reclaimed water supply. Two important considerations were not addressed in that plan: the conversion of agricultural or open space lands to urban land inventory; and campus expansion/redevelopment as envisioned in this LRDP. The LRDP build-out scenario far exceeds available water supply, based on the 2005 water plan, the May 2008 Water Supply Assessment by the Goleta Water District, as well as the District’s recent operational changes under the SAFE Ordinance. An LRDP related supply/demand solution has yet to be understood, let alone properly analyzed. The LRDP would appear to take us to the brink of water shortages or to a new level of competition for a finite water supply. This is a critical issue on several fronts, including the City’s ability to round-out its neighborhoods and create an economically viable and sustainable future under its General Plan. This matter is completely ignored by the DEIR. We have no choice but to once again call for identification, analysis, mitigations and alternatives documentation in a recirculated DEIR.

56. Impact W-2. The increased withdrawal of groundwater from the Goleta Groundwater Basin is a significant impact, since that water supply should be reserved to meet the needs of all users in the event of future prolonged dry periods in which there may be reduced deliveries of state water.

57. Impact W-3. Required mitigations should include University purchase of additional water supply from the State Water Project (over and above the present GWD entitlement) or purchase of state water supply previously committed as entitlements of other entities but not now needed by those entities. Substantial evidence needs to be provided in the DEIR that the various mitigation measures will in fact reduce the residual impact to a level of insignificance.
58. Page 4.15-1 to -6. Wastewater. The University’s growth will add considerable flow volumes which could result in significant impacts unless and until the treatment plant is expanded/modified.

59. Pages 4.15-7 to -13. Impact WW-1. The proposed mitigation measure appears to be inconsistent with the statement that wastewater from the project would not exceed the treatment requirements of the Central Coast Regional Water Quality Control Board.

60. Page 4.3-12. Common Species. The last paragraph in section 4.3.1.3 states that Eucalyptus windrows of the north and west campus provide aggregation and roosting habitat for monarch butterflies. The DEIR is inadequate in that it does not fully describe the importance of this habitat, which is part of the Ellwood Monarch Site Complex, and that the autumnal aggregation and roosting sites within the complex are essential to the success of the Ellwood Main site on the City’s recently-acquired (at a cost of about $40 million, inclusive of the value of traded property) Sperling Preserve. The Ellwood site is one of the largest monarch over-wintering sites in the state. The DEIR should further address the scarcity of suitable undisturbed habitats which provide all features necessary to be a successful monarch over-wintering site. The monarch butterfly, although not listed as rare or endangered, is certainly a species of great local importance and of importance to the California Coastal Commission, which is not acknowledged by the DEIR.

61. Page 4.3-40. Impact BIO-3. The mitigations for this impact are inadequate as stated to reduce the residual impact to a level of insignificance. The mitigations appear to allow removal of trees that constitute nesting habitat for raptors and that may in fact have been nesting trees in the past. Only protecting active raptor nests is an insufficient mitigation. In addition, the LRDP apparently allows removal of non-native trees, such as eucalyptus if they are not active nest sites for a special status species, but these trees may be essential elements of the total habitat, providing perching locations for foraging activities by raptors and other birds. The LRDP would allow removal of such trees and windrows even when they provide important habitat for monarch butterflies, since monarchs are not listed as a special status species. Monarchs are, however, considered an important local species and their habitat is considered important for protection by the California Coastal Commission.

62. Pages 4.5-1 to –22. Geology, Soils, and Geotechnical. The DEIR is inadequate in that it does not address the tsunami hazard and the additional population that will be exposed to this geologic hazard, including potential inundation by flood waters and high-velocity wave action. Appropriate mitigation measures may be necessary.

63. Pages 4.6-1 to -24. The DEIR is inadequate in that it does not sufficiently address the discontinuation of the Ellwood Marine Terminal (EMT) by year 2016, as provided in the LRDP, and does not identify the appropriate mitigation measures necessary for decommissioning the facility, clean-up of any contamination by hydrocarbons or other hazardous materials, and restoration of the natural character of the site. The decommissioning plan should also address the off-shore components of the EMT. This is a potentially significant impact which requires as mitigation the preparation of a detailed decommissioning plan by the leaseholder that is acceptable to the University
and the County Energy Division and other responsible regulatory agencies. The mitigation measure should state that all costs of decommissioning and restoration are the responsibility of the lessee holder.

64. **Page 4.6-33.** Impact HAZ-6. The DEIR does not adequately distinguish between impacts related to Venoco’s EMT, which is a lessee holder on University Property, and the impacts related to Venoco’s Ellwood on-shore processing facility (EOF), which is located in Goleta. Some impacts are associated exclusively with the EOF, while others are related to the EMT and its associated pipelines and storage tanks. It would be useful to separate these into two individual impact categories. The impacts associated with the discontinuation of the EMT are subject to mitigation. The impacts associated with the risks from additional population near the EOF are not capable of mitigation and are beyond control or management by the University.

65. **Page 4.8-22.** Impact LU-3. The City notes that its General Plan/Coastal Plan calls for a mitigation agreement to be created and entered into at the time the University amends its LRDP to increase the enrollment cap. The City looks forward to these consultations with UCSB commencing as soon as possible. Any such agreement will need to include provisions for detailed and quantitative monitoring of future changes in enrollment, and numbers of faculty and staff, as well as construction of all types of on-campus housing. Supplemental mitigations must be included in the agreement to address additional impacts that will occur if the construction of on-campus housing does not keep pace with growth in the numbers of students, faculty, and staff. Moreover, increased demand for public safety services (law enforcement and fire protection) must be adequately addressed in such a mitigation agreement. Traffic mitigations, and perhaps others, may be addressed based on planned and actual increases in the number of students, faculty, and staff, rather than on construction of ASF or GSF. The agreement needs to address other potential impacts that could occur in Goleta, as noted in the various sections of this letter.

66. **Page 5.0-4.** Project Alternatives. The DEIR needs to address another alternative, which would be based upon provision of a more-likely or realistic amount of new on-campus housing for students, faculty, and staff during the time span of the proposed LRDP. This should be in addition to the current options of the LRDP, which proposes constructing 100% of the needed housing on campus, and the alternative of no additional on-campus housing. Also, the Reduced Enrollment Cap would appear to be the environmentally superior alternative, except for the "no project" alternative. The DEIR needs to provide substantial evidence as to why the Reduced Enrollment Cap Alternative is not selected as the project to adopt and implement or substantial evidence as to why it is not considered to be a feasible alternative.

The City appreciates the opportunity to comment on the DEIR and looks forward to receiving the University’s responses to the comments. If you have questions regarding the contents of this letter, please contact Mr. Steve Chase, Director of Planning & Environmental Services, or Mr. Steve Wagner, Director of Community Services. As the University proceeds with LRDP, the City eagerly anticipates cooperative consultations regarding the creation and implementation of appropriate impact mitigation agreements between the two entities. But first things first, we all need an environmental impact report to
work from that is technically adequate and that we have confidence in. Unfortunately, that condition is a long ways off.

Sincerely,

Daniel Singer
City Manager

Cc: Henry T. Yang, Chancellor, UCSB
Gene Lucas, Executive Vice Chancellor, UCSB
Mark Fisher AIA, Associate Vice Chancellor for Campus Design & Facilities, UCSB
Jack Ainsworth, Deputy Director, California Coastal Commission, Ventura Office
Michael Brown, County of Santa Barbara
James Armstrong, City of Santa Barbara
Kamal Azoury, Goleta Sanitary District
Kevin Walsh, Goleta Water District
Response to Comment A-12-1. The recirculated Population and Housing Section adds a new mitigation measure, POP-3A, which commits the University to provide housing for each added increment of enrollment within four years of its addition. Despite this commitment, the recirculated EIR section acknowledges that enrollment increases could have a significant impact on regional housing during that four-year lag and, therefore, determines that the impact remains significant and unavoidable (please see EIR pp. 4.10-30 to -33). Due to the uncertainties involved in planning, financing, and constructing campus housing developments, the availability of housing will never exactly match housing needs. Four years, from planning and design to permitting and construction, is the amount of time the University can reasonably expect will be required to provide new housing to meet increased demand. Please see response to comment A-10-1.

Response to Comment A-12-2. Table 3.0-6 gives both ASF and GSF estimates for comparison. The LRDP proposes 1.8 million ASF and 2.5 GSF of new academic and research space. These figures are used in both the LRDP and the EIR. Public university and colleges use ASF as a space accounting unit; generally the ratio of ASF to GSF is approximately 1:1.6. The EIR analyses use either ASF or GSF depending on which measurement is relevant to the impact in a given analysis. For example, the Hazards and Hazardous Materials Section (p. 4.6-21) refers to ASF when discussing impacts associated with the use and transport of hazardous materials, because that activity would increase depending on the amount of usable space such as learning laboratories, classrooms, and research units.

Response to Comment A-12-3. For a more detailed discussion of LRDP objectives, please see Section 3.0 (Project Description), pages 3.0-26 and 27. Also, the LRDP would accommodate approximately 180 ASF per student at full buildout, not 355 (4,500,000 ASF / 25,000 students = 180 ASF). The expansion of campus facilities is not proposed merely to maintain an adequate ASF per student; rather, campus facilities would be expanded and updated to meet specific program objectives, such as increased enrollment and expanded academic programs and research facilities.

Response to Comment A-12-4. The summary table has been corrected to incorporate all revisions in the final EIR.

Response to Comment A-12-5. Figure 3.3 depicts the entire Campus boundary. Other maps in the EIR show different levels of detail, depending on the purpose of the map.

Response to Comment A-12-6. Please see response to comment A-12-2.

Response to Comment A-12-7. Table 3.0-3 (p. 3.0-6) has been revised as follows:
### Table 3.0-3. Summary of University-Owned Housing (Existing and Permitted)

<table>
<thead>
<tr>
<th>Housing Products</th>
<th>Dwelling Units</th>
<th>Bed Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>East Side Residential Halls</td>
<td>1,250</td>
<td></td>
</tr>
<tr>
<td>East Side Residential Towers</td>
<td>814</td>
<td></td>
</tr>
<tr>
<td>Manzanita Village</td>
<td>800</td>
<td></td>
</tr>
<tr>
<td>San Rafael</td>
<td>606</td>
<td></td>
</tr>
<tr>
<td>Santa Catalina</td>
<td>1,325</td>
<td></td>
</tr>
<tr>
<td>El Dorado Apartments</td>
<td>142</td>
<td></td>
</tr>
<tr>
<td>West Gate Apartments</td>
<td>60</td>
<td></td>
</tr>
<tr>
<td>San Clemente Apartments*</td>
<td>973</td>
<td></td>
</tr>
<tr>
<td>Santa Ynez Apartments</td>
<td>682</td>
<td></td>
</tr>
<tr>
<td><strong>Student Bed Subtotal</strong></td>
<td></td>
<td>6,652</td>
</tr>
<tr>
<td>West Campus Apartments</td>
<td>250</td>
<td></td>
</tr>
<tr>
<td>Storke Family Housing</td>
<td>342</td>
<td></td>
</tr>
<tr>
<td>Sierra Madre Family Housing**</td>
<td>151</td>
<td></td>
</tr>
<tr>
<td><strong>Student Family Units Subtotal</strong></td>
<td></td>
<td>743</td>
</tr>
<tr>
<td>North Campus Faculty Housing**</td>
<td>161</td>
<td></td>
</tr>
<tr>
<td>West Campus Point Faculty Housing</td>
<td>65</td>
<td></td>
</tr>
<tr>
<td><strong>Faculty Housing Units Subtotal</strong></td>
<td></td>
<td>226</td>
</tr>
<tr>
<td><strong>Total:</strong></td>
<td><strong>941</strong></td>
<td><strong>6,652</strong></td>
</tr>
</tbody>
</table>

* Under construction  
** Permitted, awaiting construction

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**Response to Comment A-12-8.** The University does not provide free campus parking.

**Response to Comment A-12-9.** The 1990 LRDP and associated EIR are based on an enrollment of 20,000 headcount on-campus 3-quarter enrollment. Additional students beyond that level require an LRDP amendment and CEQA analysis. Fall 2008 enrollment was 21,868].

**Response to Comment A-12-10.** The text on page 3.0-27 describes the general objectives of the LRDP. The LRDP proposes to build 1,874 faculty and staff units on campus, as noted in Table 3.0-6 of the EIR. The LRDP proposes 1,874 new faculty and staff housing units. The Project Description (p. 3.0-27) has been amended to clarify this (“up to” has been removed):

a. Build up to **1,874** housing units for faculty and staff.
Response to Comment A-12-11. The text of the EIR has been revised to reflect the land use figures on Table D.1.

Response to Comment A-12-12. Table 3.0-9 includes a column entitled “Units/Beds Removed.” Both that table and the text on pages 3.0-30 through -33 provide the number of “net new” housing units or beds. This value, the number to be constructed less the number to be demolished, represents the change in beds or units.

Response to Comment A-12-13. The improvements shown in Table 3.0-10 are on-campus roadway improvements proposed in the LRDP. These are separate from the improvements that would be required to mitigate traffic and other impacts. Such mitigating improvements are analyzed in Section 4.13, Transportation.

Response to Comment A-12-14. The text gives an overview of the behaviors of the student population as a whole. Detailed information regarding transportation use is incorporated into the traffic study for the EIR. (See Appendices for RDEIR Section 4.13.)

Response to Comment A-12-15. Specific coastal access improvements are discussed in the discussion of Impact REC-3 (DEIR at p. 3.12-27).

Response to Comment A-12-16. Potential major changes to the project that would reduce or avoid its significant environmental impacts, along with the feasibility of such changes, is considered in the analysis of Alternatives, DEIR Section 5.0.

Response to Comment A-12-17. The EIR analyzes the potential aesthetic impacts of development under the LRDP pursuant to the CEQA Guidelines, Appendix G, and the University of California CEQA Handbook. Mitigation for Impact AES-4 has been amended as follows to address aesthetic impacts on surrounding areas:

<table>
<thead>
<tr>
<th>LRDP Mitigation AES-4B:</th>
<th>Prior to approval of Storke Campus development projects visible from off-campus areas, the UC Santa Barbara Design Review Committee shall review project designs for:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• Campus development and design along Ocean Road respecting the adjacent Isla Vista and Storke Ranch;</td>
</tr>
<tr>
<td></td>
<td>• Compatibility with adjacent neighborhoods in terms of scale, proportion, appearance, and solar access, as well as maximizing views to the Pacific Ocean; and</td>
</tr>
<tr>
<td></td>
<td>• Project development and design on the Storke Campus shall consider ensuring the effect of existing and that proposed landscaping does not block on views of the mountains or ocean.</td>
</tr>
</tbody>
</table>

Response to Comment A-12-18. Proposed housing or academic development on North and West Campus will not be visible from the Sperling Preserve. Mitigation for Impact AES-5 has been amended as follows to address aesthetic impacts on surrounding areas:

| LRDP Mitigation AES-5A: | Prior to approval of development projects on the West Campus under the 2008 LRDP, the UC Santa Barbara Design Review Committee shall require an analysis of the development’s effect on |
views to the Santa Ynez Mountains, Devereux Slough and Pacific Ocean from viewpoints along Storke Road, El Colegio Road, Devereux Road and other public roadways and open spaces and within, and through, and around the West Campus. Adverse affects identified in the analysis shall be avoided, minimized or mitigated as part of development.

LRDP Mitigation AES-6A: Prior to approval of development projects on the West Campus under the 2008 LRDP, the UC Santa Barbara Design Review Committee shall require review of the effects to the existing high quality visual character of the natural features of the West Campus from viewpoints along Storke Road, El Colegio Road, Devereux Road and other public roadways and open space areas. Adverse effects shall be avoided, minimized, or mitigated by the development.

Response to Comment A-12-19. In general, aesthetic impacts are not quantifiable, as are other types of environmental impacts, making numerical performance standards difficult to develop. Binding mitigation measures will require review of future projects by the UCSB Design Review Committee, which will apply clear standards as provided in Mitigation Measures AES-4B and other mitigation requirements. As noted on page 4.1-21 of the EIR, aesthetic considerations will take into account the County of Santa Barbara Thresholds and Guidelines Manual. This includes consideration of scenic highway corridors, parks and recreational areas, views of water, mountain, and cultural resources, and other scenic areas. Campus development is also subject to the requirements of Section 30251 of the California Coastal Act, which requires the development to “be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, [and] to be visually compatible with the character of surrounding areas,”

Response to Comment A-12-20. RDEIR Subsection 4.10.2.2 addresses the method of analysis used to determine impacts to population and housing. Impacts POP-1 through POP-4 address impacts related to increases in population. The environmental effects of the projected increase in campus population were analyzed throughout the EIR, depending on the impact. For example, see Draft EIR Section 4.11, page 4.11-19, which analyzes the environmental effects of an additional 11,106 campus residents (at 2.68 persons per housing unit on fire protection service.

Response to Comment A-12-21. The table has been corrected as follows:
### Table 4.10-7.
SBCAG Regional Growth Projections 2005-2040

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>2005</th>
<th>2010</th>
<th>2015</th>
<th>2020</th>
<th>2025</th>
<th>2030</th>
<th>2035</th>
<th>2040</th>
<th>Annual Average Rate of Growth</th>
</tr>
</thead>
<tbody>
<tr>
<td>County Total(^1)</td>
<td>417,500</td>
<td>430,200</td>
<td>444,900</td>
<td>459,600</td>
<td>473,400</td>
<td>481,400</td>
<td>487,000</td>
<td>492,800</td>
<td>0.47%</td>
</tr>
<tr>
<td>County Unincorporated</td>
<td>135,900</td>
<td>138,300</td>
<td>140,700</td>
<td>143,000</td>
<td>144,900</td>
<td>146,800</td>
<td>148,900</td>
<td>151,200</td>
<td>0.30%</td>
</tr>
<tr>
<td>South Coast Subregion</td>
<td>204,700</td>
<td>205,800</td>
<td>208,500</td>
<td>211,300</td>
<td>213,600</td>
<td>215,700</td>
<td>216,300</td>
<td>216,900</td>
<td>0.17%</td>
</tr>
<tr>
<td>Goleta</td>
<td>31,000</td>
<td>31,700</td>
<td>33,100</td>
<td>34,500</td>
<td>35,900</td>
<td>37,300</td>
<td>37,300</td>
<td>37,300</td>
<td>0.53%</td>
</tr>
<tr>
<td>Santa Barbara Unincorporated</td>
<td>64,400</td>
<td>64,600</td>
<td>64,800</td>
<td>65,000</td>
<td>65,200</td>
<td>65,400</td>
<td>65,500</td>
<td>65,800</td>
<td>0.10%</td>
</tr>
<tr>
<td>Santa Barbara (City)</td>
<td>89,800</td>
<td>90,000</td>
<td>91,000</td>
<td>92,000</td>
<td>92,400</td>
<td>92,800</td>
<td>92,800</td>
<td>93,000</td>
<td>0.10%</td>
</tr>
</tbody>
</table>

**Notes:**
1. The Department of Finance projections for the county are inconsistent with the projections provided by SBCAG (approximately 440,000 for 2010, 460,000 for 2020 and 465,000 for 2030).
2. The South Coast Subregion includes unincorporated areas of Santa Barbara County, unincorporated areas of Carpinteria Valley, and the cities of Goleta, Santa Barbara, and Carpinteria.


Other references to SBCAG data throughout the section have been similarly updated.

**Response to Comment A-12-22.** Please see response to comment A-12-1.

**Response to Comment A-12-23.** Please see response to comment A-12-1.

**Response to Comment A-12-24.** The indirect growth effects of the 2010 LRDP are discussed in Section 4.10 of the RDEIR, starting on page 4.10-28. This analysis includes references to the UCSB Economic Forecast Project as a means of employment and regional housing demand estimation, and is continued in the analysis of Impacts POP-3 and POP-4. The environmental impacts of this indirect growth are analyzed as cumulative impacts. Please see response to comment A-10-10.

**Response to Comment A-12-25.** Please see response to comment A-12-24.

**Response to Comment A-12-26.** Under CEQA, a project has a significant impact related to law enforcement if it would lead to the need for new or expanded law enforcement facilities, the construction or operation of which would have a significant physical impact on the environment. As noted above (response to comment #20), the DEIR acknowledges that additional population from family members will accompany the direct enrollment increases and new faculty and staff, and that this additional population will increase demand for law enforcement. The DEIR further acknowledges that new law enforcement facilities may be required. Space for such facilities is designated in the LRDP. As determined in the discussion of Impact PUB-1, construction of these facilities will not have any significant, unavoidable effects on the environment.
Response to Comment A-12-27. See responses to comments A-12-1 and A-12-26. Any increase in demand for law enforcement during the four-year lag allowed under Mitigation Measure POP-3A would not have a significant and unavoidable impact on the environment, as noted in response to comment #26.

Response to Comment A-12-28. Please see the response to comment A-12-1 regarding the timing of enrollment increases and housing construction. The EIR identifies mitigation that will reduce the LRDP’s fire protection impacts to a less than significant level regardless of the pace of housing construction (page 4.11-18):

LRDP Mitigation PUB-3A: The University shall pay its proportionate share of the cost of mitigating the significant environmental effects associated with constructing or expanding Santa Barbara County Fire Department facilities necessary to serve the campus; or the University shall reserve for lease approximately one acre of land near the current site of Station 17 for any new or expanded facility the County chooses to construct. The land to be provided is designated for construction under the LRDP; and the impacts of constructing the fire station expansion are mitigated in this EIR.

LRDP Mitigation PUB-3B: Because sprinkler ring buildings offer an increased margin of safety for occupants, the University shall continue to install fire suppression sprinklers in all new buildings over 5,000 square feet in order to reduce the demand for fire suppression service.

Response to Comment A-12-29. The analysis of cumulative impacts related to police and fire services takes account of all population growth in the study area, including population growth directly related to and induced by development and enrollment increases under the LRDP.

Response to Comment A-12-30. The total area designated for recreation will increase by 4 acres (see LRDP Table B.1 [77 acres existing] and Table D.11 [81 acres proposed]). Page 4.12-24 of the DEIR has been corrected as follows:

- The total acreage of designated recreational space would be increased from 77 acres to 83 acres.

As stated in the discussion of Impact REC-4, these new facilities may not be sufficient to accommodate growth, particularly when induced and off-campus growth is considered. Physical impacts to existing facilities may result. The EIR thus concludes that development under the LRDP will have a significant and unavoidable impact related to recreation.

Response to Comment A-12-31. In the discussion of Impact REC-3, the EIR recognizes that increased population, including population growth related to enrollment growth under the LRDP, will increase use of coastal recreational resources. Mitigation Measure REC-2B would reduce this impact to a less than significant level.

Response to Comment A-12-32. The discussion of Impact REC-3 (EIR, p. 4.12-27) has been amended as follows:

Implementation of the 2008 LRDP would result in additional development around coastal access points and coastal recreational resources. There would also be an increase in the number of people using these resources. This development would result in an increased population located near, and using, existing coastal access points and recreational resources. Increased growth on campus would also increase traffic on area roads, including those which serve to access coastal areas. Increased
traffic would increase demand for parking, including parking intended to support coastal access.
These impacts would occur at coastal recreational resources both on and off campus.

The scope of this impact discussion has thus been expanded to include impacts off the Campus. The mitigation measures associated with Impacts REC-3 and REC-4 would continue to reduce it to a less than significant level, because the University would maintain trails and provide sufficient recreational opportunities for all new LRDP growth (see Mitigation Measure REC-2C, DEIR p. 4.12-26).

Response to Comment A-12-33. Comment noted.

Response to Comments A-12-34 to A-12-40. The additional documentation requested in these comments is presented in the RDEIR throughout Transportation and Circulation Section 4.13, and in particular on pages 4.13-69 – 4.13-88 and in RDEIR Appendix 4.13-3.

Response to Comment A-12-41. The additional analysis requested in this comment is presented in the recirculated Transportation and Circulation Section (4.13). Impacts to City of Goleta intersections are discussed under Impact TRAFFIC-1. RDEIR Section 4.13 concludes that the LRDP would have a significant impact on City of Goleta intersections. LRDP Mitigation TRAFFIC-1A is proposed to reduce those impacts; however, because the required improvements are within the responsibility and jurisdiction of the City of Goleta and not the University, the EIR concludes that the impact is significant and unavoidable.

Response to Comment A-12-42. The Mesa/Los Carneros intersection is analyzed in RDEIR Section 4.13 under both existing and future year conditions. (See RDEIR Table 4.13-8, Santa Barbara County study intersection #14.) The RDEIR concludes, in the analysis of Impact TRAFFIC-1, that traffic generated by development under the LRDP would have a significant impact on City of Goleta intersections, but not the Mesa/Los Carneros intersection. Nevertheless, Mitigation Measure TRAFFIC-1A requires monitoring of the Mesa/Los Carneros intersection. Information regarding the potential future Phelps/Mesa connection can be found in Master Response - Phelps/Mesa Connection.

Response to Comment A-12-43. LRDP Impact TRAFFIC-10 and LRDP Mitigation TRAFFIC-10A acknowledge parking impacts in Isla Vista as part of the proposed LRDP and identify the impacts as significant and unavoidable. As stated in the Draft EIR, this impact could be mitigated through a resident parking permit and enforcement program. Please note that since publication of the RDEIR, the State CEQA Guidelines have been amended to remove consideration of parking impacts from the Appendix G environmental checklist.

Response to Comment A-12-44. Please see the response to comment A-12-1 regarding Mitigation Measure POP- 3A, which would commit the University to build housing within four years of enrollment increases. The RDEIR section includes analysis of a “Housing Lag” scenario, in which housing construction lags four years behind enrollment increases. (i.e., the supply of on-campus housing in a given year matches the enrollment level four years previous). See RDEIR, page 4.13-76.

Response to Comment A-12-45. Please see the Master Response to Fair Share Determinations for Transportation and Traffic Mitigation and RDEIR page 4.13-117 regarding the University’s method for calculating its fair share of the cost of traffic improvements. This method will use the refined version of the traffic model developed for the RDEIR, and will also include periodic monitoring of actual traffic counts in order to ensure that it accurately reflects the University’s share of traffic impacts. As noted in the Master Response, such payments will be calculated and remitted at the time each project is approved.

Response to Comment A-12-46. Table 4.13-52 in RDEIR Section 4.13 clarifies the location of significantly impacted intersections and roadway segments. As CEQA requires, the EIR identifies mitigation measures to reduce or avoid impacts at each intersection, roadway segment, or freeway facility where the LRDP would have a significant adverse effect and where effective mitigation is feasible. Mitigation Measure TRAFFIC-
4A(1) requires the promotion and enhancement of existing programs, including vanpools, for a 10% reduction of campus trips. In addition, the following has been added to TRAFFIC-1A:

Please see responses to comments A-12-48 and A-13-1 for actions which the University will undertake to mitigate traffic impacts. In response to the suggested measures, Mitigation Measure TRAFFIC-1A(1) has been amended as follows:

**LRDP Mitigation TRAFFIC-1A:** (1) Enhance and promote existing transportation demand management measures and develop new measures to reduce travel by single occupant vehicles to achieve an overall reduction of at least 10% of trips to and from campus (measured against the anticipated LOS in Tables 4.13-39, 4.13-41, and 4.13-48). Measures may include, but are not limited to, the University's participation in one or more of the following programs:

- **(A)** an expansion of SBCAG's Traffic Solutions ride-share, carpool, and vanpool programs on campus and in Isla Vista to include cars at on-campus housing nodes;

- **(B)** a negotiated group-rate with SBCAG and the Ventura County Transportation Commission to provide for UCSB students, faculty, and staff for the Clean Air Express and VISTA Coastal Express services, respectively;

- **(C)** coordination with the MTD to maintain and improve scheduled service connections between UCSB, Isla Vista, and the surrounding community;

- **(D)** the maintenance or expansion of the MTD pass programs to continue coverage of all students and extend benefits to faculty and staff;

- **(E)** the maintenance or expansion of the University's existing shuttle fleet to include connectivity to Camino Real Marketplace and the Goleta Train Station.

**Response to Comment A-12-47.** Please see the Master Response – Phelps/Mesa Connection.

**Response to Comment A-12-48.** The LRDP states the following on page 3.0-37 (emphasis added):

> The transit system at the University will continue to utilize external regional transit service provided by the SBMTD. Under the proposed 2010 LRDP, the bus loop located off of Ocean Road would be reconfigured to provide a clearer, safer transit hub. Additional bus and shuttle stops will be provided in University housing neighborhoods. The University will continue to work with the SBMTD to provide improved bus service to the campus.

LRDP Mitigation Measure TRAFFIC-8A commits the University to work with MTD and local agencies to improve transit service. Transit improvements resulting in fewer driving trips will be quantified through mitigation monitoring as outlined under LRDP Mitigation TRAFFIC-1A(2). The University will quantify
traffic volume changes through the collection of actual traffic counts at campus gateways and nearby intersections. The effectiveness of transit improvements can be measured through changes in vehicle volumes on campus roadways. Mitigation Measure TRAFFIC-4A(1) requires the promotion and enhancement of transit programs, including improved transit service in close proximity to the housing complexes and anticipated designations (e.g., Main Campus, nearby retail centers, etc.), car sharing, neighborhood serving retail uses, and providing improved bicycle and pedestrian facilities (see page 4.13-142 of RDEIR Transportation Section.

Please see response to comment A-12-46.

Response to Comment A-12-49. Please see responses to comments A-12-46 and A-12-48.

Response to Comment A-12-50. Please see responses to comments A-12-46 and A-12-48.

Response to Comment A-12-51. The plans for Storke Campus housing include a 20-foot height limit at a 100-foot distance from the western periphery of the site. Based on what the LRDP proposes, Storke Housing development would not extend into the existing, approximately 100-foot space between it and Storke Ranch. Buildings on the western edge of the site will be single-family homes, as they are in the Storke Ranch community, and student housing will be located away from non-university neighbors toward the center of the site. Access Road will remain. The stepped-down building height of Storke Housing will minimize the change in character from single-family homes in the Storke community to condominiums and apartments on the campus.

Impacts associated with Storke Campus proposals are addressed under Impact AES-4. Mitigation AES-4 has been amended as follows to address the transition to neighboring communities:

| LRDP Mitigation AES-4B: Project development and design on the Storke Campus shall consider the effect of existing and proposed landscaping on views. |
| LRDP Mitigation AES-4B: Prior to approval of Storke Campus development projects visible from off-campus areas, the UC Santa Barbara Design Review Committee shall review project designs for: |
| - Campus development and design along Ocean Road respecting the adjacent Isla Vista and Storke Ranch; |
| - Compatibility with adjacent neighborhoods in terms of scale, proportion, appearance, and solar access, as well as maximizing views to the Pacific Ocean; and |
| - Project development and design on the Storke Campus shall ensure the effect of existing and proposed landscaping does not block views of the mountains or ocean. |

Response to Comment A-12-52. The impacts of the LRDP associated with air quality (Section 4.2), noise (Section 4.9), water (Section 4.14), transportation (Section 4.13), aesthetics (Section 4.1), and public services (Section 4.11) are addressed in the specified EIR sections. Any relevance these impact areas have for Storke Ranch is noted in the analysis for those sections. In addition, as for all development projects under the LRDP, project-specific impacts will be addressed through project-level environmental review for proposed development adjacent to the Storke Ranch neighborhood.

Response to Comment A-12-53. Pursuant to LRDP Policy ESH-4, non-native trees such as eucalyptus may be removed only if they do not provide roosting habitat for sensitive species, including raptors and Monarch
butterflies. In general, biological and scenic impacts and their mitigation, such as BIO-3, along with LRDP policy (ESH-4, ESH-5, ESH-10, ESH-16, as well as SCEN-5 and SCEN-6) are written to ensure that resources such as trees are identified as part of site planning for specific projects, and that measures are undertaken to avoid impacts to trees, where feasible, or to minimize impacts where avoidance is infeasible.

Response to Comment A-12-54. The University is providing parking for new housing complexes to accommodate the parking demand for student, faculty and staff residents. This demand is based on the analysis presented in RDEIR subsection 4.13.1.4. The University conducts occupancy surveys of campus lots annually to determine if parking supply meets demand. Annual parking survey results will be included in the monitoring of parking demand, as required by Mitigation Measure TRAFFIC-1A(3) (RDEIR p. 4.13-119).

Response to Comment A-12-55. Please see Master Response - Water Supply section I.

Response to Comment A-12-56. According to the standard of significance used in the RDEIR for groundwater water impacts, the LRDP's impacts would be considered significant if the LRDP would “[s]ubstantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).” RDEIR, p. 4.14-26; see CEQA Guidelines, Appendix G, § VIII.b). The LRDP would neither substantially deplete groundwater supplies nor interfere substantially with groundwater recharge, because any increased pumping would be limited to the District's allocated supply and banked groundwater. The availability of groundwater during dry years is further discussed in Master Response – Water Supply section IV.A.

Response to Comment A-12-57. The mitigation identified in the RDEIR includes Measure W-3F.

LRDP Mitigation W-3F: The University shall work to identify and acquire additional water supplies beyond those currently available to GWD as necessary to UCSB potable water demand independently or with GWD, appropriate.

Please see Master Response - Water Supply section II. The RDEIR analyzes the feasibility of obtaining additional SWP supplies. RDEIR, p. 4.14-45 to -49; see also Master Response - Water Supply VI.B.

Response to Comment A-12-58. As noted on pages 4.15-8 and 9 of the RDEIR Wastewater Section, development under the LRDP would produce wastewater flows that exceed the University’s portion of the design capacity of the Goleta Wastewater Treatment Plant. It would also lead to the exceedance of the University’s portion of the capacity available under the plant’s National Pollution Discharge Elimination System (NPDES) permit, as issued by the Central Coast Regional Water Quality Board. The plant's permitted capacity is smaller than its design capacity, and can thus be expanded without any physical alteration to the plant. Development under the LRDP would also lead to the exceedance of the Goleta Sanitary District's portion of the plant's permitted capacity.

The RDEIR Wastewater Section identifies LRDP Mitigation Measures WW-1A and -1B, under which the University will request an increase in permitted capacity and seek to purchase an additional share of design capacity in the plant, respectively. Because these mitigation measures rely on decisions—the reissuance of the permit and the sale of design capacity—that are within the responsibility and jurisdiction of other agencies, the RDEIR Wastewater Section concludes that the impact would be significant and unavoidable.

Response to Comment A-12-59. As noted in the response to comment A-12-58, the RDEIR Wastewater Section acknowledges that development under the LRDP would produce wastewater flows that would exceed the Goleta Wastewater Treatment Plant’s current NPDES permit.
Response to Comment A-12-60. Detailed discussion of monarch butterflies is provided in Section 4.3.1.4 of the DEIR, including locations of known aggregations. Monarch butterflies are specifically addressed on page 4.3.20. The importance of Monarch butterfly roosting habitat is also acknowledged on page 4.3-26.

Impact BIO-1 requires the implementation of LRDP policies, including Policy ESH-4, which provides:

ESH-4 To preserve roosting habitat for sensitive bird species and monarch butterflies, special consideration and care shall be given prior to the removal of any significant non-native trees such as eucalyptus and some pine species that are recognized roosting areas for sensitive species. Non-native tree and brush species may be removed if their presence inhibits fulfillment of other LRDP objectives, such as restoration of native habitat, and biological studies show that the trees do not provide habitat for rare or sensitive species. [emphasis added]

Because the Monarch butterfly is a sensitive species, as noted in the DEIR at [FILL IN], this policy would bar the removal of roosting habitat.

Response to Comment A-12-61. LRDP Policy ESH 4, which is reproduced in the response to comment A-12-60, above, prohibits the removal of non-native trees that provide habitat for sensitive species.

Response to Comment A-12-62. The EIR analyzes the risk of tsunami at DEIR pages 4.7-41 to -42. It determines that with LRDP Mitigation Measure HYD-6A, requiring the continuation of the University’s tsunami communication, readiness, and evacuation procedures, will be reduced to a less-than-significant level.

Response to Comment A-12-63. As stated on page 4.6-33 of the DEIR, Impact HAZ-9, Venoco’s lease with the University for the Ellwood Marine Terminal expires in 2016. The lease requires Venoco to decommission the facility under the oversight of the applicable environmental regulatory agencies, including the Coastal Commission, and LRDP Policy HAZ-7 encourages Venoco to begin the process of decommissioning the facility before then.

Response to Comment A-12-64. See the response to comment A-12-63. Impact HAZ-7 analyzes exposure to Venoco operations.

Response to Comment A-12-65. Comment noted.

Response to Comment A-12-66. This EIR analyzes a No On-Campus Housing Alternative (DEIR, pp. 5.0-21 to -28) and a Virtual University Alternative (DEIR, pp. 5.0-28 to -33), which involve construction of less on-campus housing. The suggested alternative would not fulfill the project objectives to house 100% of additional students. In addition, as discussed on page 5.0-2 of Alternatives Section, relocation of growth off campus was determined to be infeasible due to scarcity of land available, further biological resource constraints, and other resource limitations such as water supplies of other jurisdictions. Biological impacts were determined to be similar whether development occurs on campus or off campus due to the nature of resources in the area, and the fact that shifting housing off campus would merely shift impacts to another location and not fulfill CEQA requirements to reduce impacts of the project as proposed.

As noted in subsection 5.3, the environmentally superior alternative (other than the No Project scenario) is determined to be the Reduced Enrollment Alternative. The EIR makes this determination according to the requirements of CEQA Guidelines Section 15126.6(e)(2), although it is not within the purview of the EIR to select a project to adopt. That action will be carried out by the Lead Agency, the Regents of the University of California.
20 June 2008

Marc Fisher
Associate Vice Chancellor for Campus Design & Facilities
University of California
Santa Barbara, CA 93106-1030

Dear Mr. Fisher,

The Santa Barbara Metropolitan Transit District (MTD) has reviewed the University of California, Santa Barbara Long Range Development Plan (UCSB LRDP) Draft Environmental Impact Report (DEIR) and offers the following comments:

The DEIR, in section 4.13, claims that the impact of the UCSB LRDP on transit ridership in the vicinity of campus would be “Less than significant.” MTD strongly disagrees.

Currently, UCSB students account for about 10.5% of MTD’s system-wide ridership, while faculty and staff make up another 3% or more.¹ While these UCSB-affiliated populations travel throughout MTD’s system, they comprise a much higher portion of our ridership on the six routes serving UCSB and the community of Isla Vista. For example, 57% of the current passengers on MTD’s line 24x are UCSB students and nearly 40% of all UCSB student trips are on line 24x.² On average, more than 30% of the passengers on routes 11, 15x, 23, 24x, 25, and 27 are UCSB students and several trips on these routes are regularly overloaded or operate near capacity already.³

It is important to note that the ridership figures in the previous paragraph are for UCSB students, and do not include faculty and staff (and their families) or visitors, none of whom are separately tracked by MTD. New UCSB faculty, staff, and their families will add an additional 4,300 or more people to MTD’s service area.⁴

Although UCSB is proposing to house all of its new population on campus, people will continue to use local transportation systems as they travel off-campus to visit friends, go downtown, etc. The proposed 25% increase in the student population can be expected to generate at least a 25% increase in student transit ridership, but this ridership will not be distributed evenly through the MTD system. Route 24x, for example, already experiences overloaded trips each day leaving passengers at the curb. This route would be expected to bear a 15-20% ridership increase. Other routes serving UCSB would be similarly affected.

The DEIR does not consider cumulative impacts to transit ridership that would result from the adoption of both the UCSB LRDP and the Isla Vista Master Plan (IVMP), which proposes to add 4,355 new residents to Isla Vista — a 24% increase in that community’s population.

To accommodate the cumulative additional population envisioned by these plans and avert a degradation of transit service in the area, MTD suggests initially increasing the span of service and reducing headways

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¹ UCSB faculty & staff ridership is not tracked separately by MTD, but the DEIR says a 2006 survey found that 7% of faculty and staff typically commuted by transit.
² Line 24x is an express service between downtown Santa Barbara & UCSB.
⁴ The DEIR states that the average household size in the area is 2.7 persons but that in 17% of faculty/staff households, both adults are employed at UCSB.
(time between buses) on routes 23, 24x, 25, and 27, and possibly creating a new route to serve proposed UCSB housing locations that are not currently served by transit. These improvements could be phased to coincide with the gradual increase in UCSB & Isla Vista populations, but they will ultimately require between 27,000 and 38,000 additional revenue hours per year and will entail the expenditure of $4.1-6.3 million in up-front capital costs (for buses and bus stop furnishings). Additional ongoing operating costs (after fare box recovery) would be roughly $2.9-4.0 million per year.\(^5\)

Diverting already-overstretched transit resources from other parts of the District to accommodate additional transit needs in the UCSB area is not an option. New fare box revenue is not expected to offset much of the cost\(^6\), so to obtain this service, it will be necessary for UCSB and the County of Santa Barbara to provide ongoing operating assistance.

In keeping with its progressive reputation and as a leader in the community however, UCSB should consider placing more emphasis on alternative transportation modes. The IVMP calls for 15-minute transit headways day and night. While such high frequencies may not be appropriate for all routes at all times, the ultimate goal is to make alternative transportation options, including transit, so convenient that few people will choose to drive their cars to campus or in Isla Vista.

Transit industry experience and elasticity calculations show that further transit enhancements, especially if combined with strong incentives to use transit (such as again providing free transit passes to UCSB faculty and staff), could also help mitigate the significant and unavoidable traffic impacts of the LRDP and IVMP on the larger Goleta area. More frequent buses and expanded hours of transit service would also facilitate coastal access in an area where lack of available public parking is often a limiting factor.

It will be essential for UCSB and the County of Santa Barbara to work together and with MTD to minimize the impacts of the UCSB LRDP and the IVMP by ensuring that convenient, reliable, and affordable public transportation continues to be available in the UCSB/Isla Vista area.

Thank you for this opportunity to comment. If you have any questions, or if you would like to discuss this further, please feel free to contact me.

Sincerely,

\[\text{ Sherrie Fisher}\
\text{ General Manager}\

cc: Jamie Goldstein, Santa Barbara County Redevelopment Agency, Steve Hudson, California Coastal Commission

\(^5\) Based on MTD FY 2009 budgeted total hourly operating cost (not including depreciation) of $107.51. Operating costs will increase as fuel prices and other expenses continue to rise.

\(^6\) Estimated fare revenue assumes that 75 percent of riders would be UCSB students who would not pay additional fare, and 25 percent of riders would pay an average fare of $0.92.
Response to Comment A-13-1. The University disagrees that increase transit ridership constitutes a significant adverse effect on the environment. In addition, the University is committed to working with agencies and local jurisdictions to expand its extensive alternative transportation programs, and will consider the measures proposed by the MTD, which will involve consideration of shorter headways, further transit enhancements, expanded hours of service, and service to coastal areas. LRDP Impact TRAFFIC-8 and Mitigation TRAFFIC-8A state that the University will work with MTD and local agencies to improve transit service, which could include subsidies, free passes, additional services, vehicles, and facilities. Please see response to comment A-12-36, amending Mitigation Measure TRAFFIC 1A(1) to add additional transit-related measures to the TDM program. As part of Mitigation Measure TRAFFIC-1A(3), and the required mitigation monitoring program (see page 4.13-119), the University will work with the MTD in making recommended improvements.
University of California  
Office of Campus Planning & Design  
c/o Vision2025  
Santa Barbara, CA 93106-1030

June 23, 2008

To Whom It May Concern:


The Board of Directors of the Isla Vista Recreation and Park District ("District") submits these comments to the March 2008 Draft Environmental Impact Report ("Draft EIR") for the proposed 2008 Long Range Development Plan ("LRDP") for the University of California, Santa Barbara (the "University.")

Introductory and General Comments

As discussed below, we find that the Draft EIR fails to adequately disclose, evaluate and mitigate impacts of the LRDP on the District's parks, trails, facilities and other resources and services discussed in this letter. Accordingly, we request that the University work with the staff and Board of the District to develop feasible mitigation for the LRDP's impacts on the District, that the Draft EIR be revised to incorporate full and adequate mitigation for those impacts, and that the document be recirculated for further public consideration and comment pursuant to Public Resources Code Section 21092.1.

The Draft EIR is also inadequate because even when mitigation measures are proposed, the schedule for their implementation is well after the impacts, sometimes four years later. Mitigation of any potentially significant impacts must be implemented before or concurrent to impacts.
In addition, the Draft EIR is inadequate because it fails to ensure that the LRDP will comply with the Coastal Act, which mandates protection of coastal resources. Isla Vista is a coastal community that wholly resides in the coastal zone. However, the Draft EIR has failed to adequately disclose, evaluate and mitigate the impacts of the LRDP on the coastal resources in Isla Vista.

The Draft EIR is inadequate because it fails to address impacts from increases in population groups other than students, faculty and staff. There is a multiplier effect for each student, faculty or staff member added to the University of households, family members and/or partners that join students, faculty and staff coming into the Santa Barbara community to attend or work at the University. There are also other people who come to the area to provide services to the increased population.

As noted below, the mitigation measures proposed by the Draft EIR are inadequate with regard to the proposed population increase because only the student population is limited by the proposed cap. In order for the mitigation measures proposed to actually mitigate the impacts from an increase in students, faculty and staff, all categories should have a cap for this amended LRDP. Otherwise, the University could grow staff and faculty, (in the research and development arena, for example) creating additional impacts that will not be mitigated.

The District concurs and incorporates by reference the comments of the County of Santa Barbara on the Draft EIR and LRDP, to the extent they identify impacts to Isla Vista and propose mitigations, especially with regards to infrastructure and services.

Listed below are the Sections of the Draft EIR for which the District has specific comments.

Section 4.12 Recreation

The District is a California special district that provides recreation and park services to the residents of Isla Vista as well as the general public. The District owns and maintains 22 parks encompassing approximately 50 acres of parkland and maintains three County beach access routes and parks and additional trails within its jurisdiction. These parks, access routes and trails provide a wide range of passive and active park space, access, and recreational amenities for the benefit of all who reside in, or come to, Isla Vista. The territory of the District borders public beaches and the Pacific Ocean on one side, and is surrounded by the University on its three other sides.
Students of the University who live on- and off-campus are a substantial segment of the general population served by, and who recreate in, the District’s parks and facilities, or who use the District’s trails to obtain access to other areas in and around Isla Vista. The Draft EIR states that approximately 40% of University students live in Isla Vista (Table 4.12.3). The Draft EIR acknowledges that the University’s current academic operations place a significant demand on public recreational services by the District. This demand will increase with the additional student population proposed by the University’s LRDP.

The District’s parks are already overburdened based on the population served. Even without accounting for the on-campus student use of District parks, the ratio of parkland per acre compared to the population in Isla Vista is approximately 2.7 acres of parkland for each 1,000 persons. This is less than the minimum standard of three acres of parkland per 1,000 persons specified in the California Quimby Act (Government Code Section 66477) and much less than the County of Santa Barbara standard of five acres per 1,000 persons. Accordingly, any direct or indirect increase in demand on District parks will further exacerbate the lack of available recreational resources needed to serve the Isla Vista population.

The Draft EIR asserts that because the LRDP proposes to accommodate all new student, faculty and staff in on-campus housing and to provide certain new recreational amenities on campus, that direct and indirect impacts to recreational resources will mainly affect campus facilities and adjacent beaches (Draft EIR at p. 4.12-24). The Draft EIR, however, fails to adequately disclose and analyze the other side of that equation which is the direct and indirect impacts to District parks and trails.

There is substantial evidence that: (i) there is significant existing use of District parks and trails by the current population of University students, faculty and staff, even with the existence of on-campus recreational facilities; (ii) the fact that on-campus students, faculty and staff regularly use District trails to traverse to other areas, including beaches, in the study area; and (iii) that current on-campus and off-campus students, faculty and staff currently attend, and will continue to attend, planned and informal recreational gatherings, parties and musical events at District parks in Isla Vista. All of these existing direct impacts will be increased with additional student, faculty and staff populations at the University and cause wear-and-tear, clean-up, repair and renovation expenses on District owned and maintained parks and facilities. Furthermore, it is common fact that Isla Vista parks act as a crossroads point for social interaction between students who live on campus and those who reside in Isla Vista.

Substantial evidence exists of the current and reasonably likely impacts to the District by way of: (i) regular notices of student planned events,
especially free student planned musical events in Isla Vista; (ii) police service calls to Isla Vista that often arises from these student uses; and (iii) the long and celebrated behavior patterns of student events and activities in Isla Vista. For example, the very founding of the District arose out of University student protests that occurred in open space and park areas in Isla Vista that later became District parks. That tradition of use of Isla Vista parks for a variety of student oriented events and recreation continues in a variety of forms. As noted above, the close geographical proximity of the District’s parks to the University (sometimes just one block away) and Isla Vista’s location surrounded on three sides by the University and other off-campus recreational resources that are acknowledged as being impacted by the University, make such direct use and impact indisputable.

The Draft EIR concedes some impact to off-campus recreational resources by acknowledging impacts to surrounding beach areas and county parks. However, given such disclosure, the Draft EIR’s failure to disclose, analyze and mitigate the similar and more severe impacts on District parks and facilities makes the defects of the Draft EIR pronounced.

In addition, the Draft EIR fails to disclose and impose mitigation measures designed to lessen indirect effects on the District caused by the induced population growth of the non-University population in the area. The Draft EIR also fails to disclose or impose any mitigation measures designed to mitigate the Plan’s contribution to the cumulative impact on District resources.

For example, none of the summarized impacts of the LRDP acknowledge any direct or indirect impact to the District (See LRDP Impact REC-1, REC-2, and REC-3.) In addition, there are only three mitigation measures listed in the Draft EIR for direct or indirect recreational impacts. None address impacts to the District. Those mitigation measures apply only to beach and County park impacts, and then call for an unspecified level of additional on-campus recreational facilities, continued maintenance of beach areas, and the inclusion of tot lots and adult exercise facilities in new on-campus housing developments (Draft EIR, p. 4-12-26.) The Draft EIR then concludes that with those measures, the residual impacts to off-campus recreational resources are less than significant. Impacts to the District are completely left out of any of those conclusions and mitigation measures.

Even if these three existing mitigation measures were to be revised to assert that they also mitigate impacts to the District, there would be no evidence or analytic support for such a simple revision. This is because there is no evidence for the EIR’s assertion that providing more recreational amenities on campus will reduce off-campus recreational impacts, and particularly impacts to District parks, facilities and services, to a level of less than significant. First, Mitigation Measure REC-2A only requires additional
on-campus recreational capacity within four years after enrollment increases. This means that, at a minimum, there will be a continual four-year lag between the increased demand for recreational resources and on-campus facilities designed to partially address that need. This leaves a substantial and continual unmitigated impact. Second, maintenance of certain area beaches as provided in Mitigation Measure REC-2B provides no mitigation of District park impacts. Third, Mitigation Measure REC-2C, which was drafted to apply only to County parks, calls for adult exercise facilities and tot lots, not mitigation for the other active and passive outdoor recreation impacts within a park setting.

There is no mitigation for the fact that the additional students, faculty and staff who will reside on campus will regularly and frequently come to Isla Vista parks for events and to recreate with the sizable University student population that resides in Isla Vista. Given the sizable University population that will continue to reside in Isla Vista even after the Plan’s implementation, such demand will continue and increase as the on-campus population increases.

It is also important to place these impacts into the context of compliance with the California Coastal Act (California Public Resources Code §§30000 – 30823), which as noted in the Draft EIR, require protection of coastal resources, coastal access and preservation of inland land and recreational areas within the coastal zone (See Public Resources Code §§ 30220 – 30224). Although the Draft EIR does require ongoing maintenance of certain beaches and trails, the Draft EIR does not address the LRDP’s compliance with the Coastal Act with respect to preserving upland area for support of coastal recreational uses. The District’s parks provide important recreational resources in the coastal zone and, as stated previously, would be adversely and significantly impacted by the LRDP. The Draft EIR does not sufficiently discuss and mitigate the LRDP’s compliance with the Coastal Act.

The District seeks to have the University fully disclose and analyze the Plan’s impact on the District recreational resources and then to work with the District to develop clear, objective and enforceable mitigation to address these impacts. A feasible combination of measures would include grants to the District for acquisition of additional parkland by the District in Isla Vista and annual payments and contributions to the District for ongoing maintenance, clean-up and renovation expenses reasonably related to the University’s impacts on District parks and facilities. Additional measures may also include payment for the District’s delivery of recycled water and funds to build the District’s planned community center. Without these types of mitigation measures, the Plan’s impacts on the District will not be mitigated and the University will not have complied with CEQA’s
requirement to provide feasible mitigation to reduce these impacts to a level that is less than significant.

Section 4.11 Public Services

The LRDP proposes a substantial increase to University student, faculty and staff population. For the same reasons mentioned in our prior comments under recreational impacts, the inevitable challenge of trash management and graffiti will further intensify with approval of the LRDP. The District already has programs in place that aim to involve the community in maintaining trash and graffiti in Isla Vista. These programs provide for the meticulous documentation and removal of both trash and graffiti. However, with additional University population, there will be a significant increase in the need for these services because University students are a well-documented source of these impacts. The Draft EIR does not disclose, analyze or mitigate these impacts.

The increased service requirements on the District to address the additional trash and graffiti will increase the amount of money, time, and resources spent by the District to rectify these inevitable consequences. The District acknowledges that the University is currently a partner in “Adopt-A Block,” a program that seeks to address some of these problems. The District appreciates the University’s involvement in that program. However, increased University population and induced population arising from the LRDP will require more graffiti and trash management services, and more funding to mitigate those impacts. The Draft EIR is deficient in providing any mitigation for these impacts.

With respect to police services, the impacts on the District from graffiti abatement have already been noted in the prior comment. In addition, Isla Vista requires a high level of police patrol, especially on the weekends, due to well-documented excessive alcohol and drug use by some University students. The impacts to District parks from this behavior include graffiti, trash and vandalism to District facilities, equipment and landscaping. The University’s impact on police services in Isla Vista is already acknowledged by the fact that University officers provide additional patrols in Isla Vista. The direct, indirect and induced population growth arising from the LRDP will result in additional demand for police services needed to address the behavior mentioned above. To maintain a safe community, more people will require more police. The Draft EIR fails to provide sufficient clear, objective and enforceable mitigation for these impacts.

Section 4.13 Traffic and Circulation

The LRDP will cause an increase in vehicular, pedestrian and bicycle traffic within Isla Vista, and this impact has not been adequately addressed in the Draft EIR. It is well recognized that with the existing roadway
infrastructure, peak-hour traffic and inclement weather, public transportation is not currently effective to accommodate existing volumes of traffic in Isla Vista. Consequently, any increase in traffic in Isla Vista will burden an already overburdened transportation system and will be significant, especially bicycle and pedestrian traffic. Especially troubling is that an increase in vehicular traffic will significantly impact pedestrian and bicycle traffic. The impacts of greater vehicular, pedestrian and bicycle traffic impacts are not adequately disclosed and mitigated in the Draft EIR.

In addition, if all Isla Vista streets are opened to connect to Ocean Road, then traffic will increase significantly in Isla Vista. We note that now only Sabado Tarde opens on to Ocean Road, and it is gated to permit entry by buses only. The District supports opening up bike lanes to the University campus to distribute bicycle traffic. However, the District opposes opening vehicular traffic from Ocean Road into east-west Isla Vista streets. No increase in vehicular traffic from ocean road to Isla Vista should be permitted unless and until feasible mitigation measure are proposed and funded.

The Draft EIR is inadequate because the traffic mitigation measures are proposed to be phased in over time three to four years after the impacts have occurred, leaving a continual unmitigated level of impact. To effectively mitigate to a level of less than significant, mitigation measures must be implemented prior to, or concurrently with, planned impacts.

With respect to impacts on vehicular parking, University students and staff now park in Isla Vista to avoid paying for on-campus University parking. More students and staff will exacerbate the current problem. The proposed mitigation through the establishment of a proposed parking permit program (Mitigation Measure TRAFFIC-10A) does not constitute enforceable mitigation because the California Coastal Commission has already rejected this type of program. The District is not aware of a revised permit parking program proposal that has or can address the Commission’s concerns. Accordingly, Mitigation Measure TRAFFIC-10A is not likely to be implemented and is “empty” and insufficient mitigation. CEQA requires the imposition of feasible and enforceable mitigation to reduce impacts even if those impacts cannot be lessened to a level of less than significant.

The University should explore and then include in the Draft EIR other feasible mitigation for this impact. One such measure would be to provide more on-campus and off-campus free or reduced-cost parking facilities. Another measure would be to prohibit all freshman and sophomores from bringing cars to campus, as has been done at other universities. The potential reluctance of the University to consider or impose these measures does not justify a failure of the Draft EIR to evaluate and provide for them in the Draft EIR.
* * *

For the reasons discussed above, the District asks that the University work with the staff and Board of the District to develop feasible mitigation measures for the impacts indicated in this letter, that the Draft EIR be revised to incorporate those measures, and that the Draft EIR be recirculated to provided additional public review and comment pursuant to Public Resources Code Section 21092.1.

Thank you for your attention to these important matters. If you have any questions, please contact the District’s General Manager, Carol Belser at (805) 968-2017 ext. 27.

Sincerely,

[Signature]

Ken Warfield
Chairman of the Board
Response to Comment A-14-1. The summary concerns are addressed in the specific responses in the following responses.

Response to Comment A-14-2. IVRPD facilities are discussed in detail in Section 4.13.1.2. In the impacts section, IVRPD facilities were inadvertently combined with other park facilities into the “county” park category. The text shall be amended to specifically list IVRPD facilities throughout, including impacts, impact discussions, and mitigation measures. For example, Mitigation REC-2C has been amended as follows:

In order to reduce the demand upon nearby County parks, including County and IVRPD parks, the University will also provide additional recreation facilities or services for the residents of new housing developments, including but not limited to the provision of tot lots and adult exercise facilities.

The portion of the cumulative impacts section addressing county parks, DEIR page 4.12-30, is likewise clarified as follows:

Santa Barbara County. SBCAG estimates the 2025 population of the unincorporated areas of Santa Barbara County at 144,900 people. This includes the community of Isla Vista, among other unincorporated communities. This represents an approximately 3,000-person increase compared to the most recent Department of Finance population count for the County in 2007. The additional population living on campus at the end of the 2008-10 LRDP’s timeframe will likely use County parks, in particular those County and IVRPD parks located within one mile of the campus.

The County park resources equal approximately 4.8 acres per thousand people, which is above the County’s target ratio of 4.7 acres per thousand people. If no additional land is dedicated to County parks, the increase in population over the timeframe would produce a ratio of 4.6 acres per thousand people, and would therefore require additional dedication of developed parkland. Cumulative growth under the implementation of the 2008-10 LRDP would indirectly exacerbate projected deficiencies in county park acreage.

Isla Vista. As stated previously, the community of Isla Vista currently has approximately 2.8 acres of parkland per thousand population, not including beaches, UC Santa Barbara property, or Coal Oil Point. While no standard is set for the community in the Isla Vista Master Plan, the existing acreage ratio is below both federal guidelines (3 acres per thousand) and County standards (4.7 acres per thousand). Cumulative growth under the implementation of the 2010 LRDP would indirectly exacerbate existing and project deficiencies in IVRPD park acreage.

Direct impacts of University growth to IVRPD as proposed under the 2010 LRDP are addressed by Mitigation REC-2A through REC-2C (as amended above). The University proposes to increase recreational opportunities in concert with both new enrollment and new housing.

Response to Comment A-14-3. Please see response to Comment A-12-2, above.

Response to Comment A-14-3(a). Please see response to comment A-12-1. By phasing the construction of new recreation facilities in coordination with the construction of new housing, the recreation facilities will keep pace with the arrival of the population that will live on campus. Please see responses to comments A-11-5 and A-14-3(d). Recreation impacts and mitigation measures are distinct from the timing of housing. These impacts will be reduced to a less than significant level as described below in #3(b).
Response to Comment A-14-3(b). LRDP Mitigation Measure REC-2B provides for the maintenance of beaches and coastal access. Maintaining these beaches in good condition ensures that they have capacity to serve recreation demand that might otherwise impact Isla Vista parks. LRDP Mitigation Measures REC-2A and 2C provide for the construction and maintenance of facilities that are more direct substitutes for Isla Vista parks. Together, these measures will reduce the LRDP’s impacts on off-campus recreation resources to a less than significant level.

Response to Comment A-14-3(c). Please see response to Comment A-14-2, above.

Response to Comment A-14-3(d). Students housed on campus are likely to continue using Isla Vista parks, and the number of campus residents will increase under the LRDP. By providing additional on campus recreational resources for both new enrollment and new residential populations, as discussed under REC-1 and REC-2, the University will reduce use of off-campus recreational resources by University-affiliated populations to a level where physical impacts to off-campus resources will be less than significant. The University provides many facilities and maintains resources that benefit the greater regional population, not just the campus. In addition, the University will be required to provide new recreational facilities with new housing developments (p. 4.12-26; Mitigation Measure REC-2C). As stated on page 4.12-24 of the DEIR, “the total acreage of designated recreational space would be increased from 77 acres to 83 acres.” In addition, beaches and other natural areas offer further active and passive recreational opportunities.

Response to Comment A-14-4. Upland recreational resources are addressed in Impact REC-2. The discussion following REC-3 has been amended as follows:

These policies are consistent with the Coastal Act and will protect coastal resources. However, as stated under Impact REC-2, implementation of the 2008 LRDP may indirectly impact coastal access and other coastal recreational areas (including upland facilities within the coastal zone) that are maintained by other agencies. Implementation of the monitoring program mitigation outlined in Mitigation REC-2AB would reduce potential impacts. With the implementation of the above-mentioned 2008 LRDP policies and Mitigation REC-2AB, impacts to coastal access and coastal recreational resources will be less than significant.

Response to Comment A-14-5. Please see the Master Response - Fiscal Impacts.

Response to Comment A-14-6. Please see the Master Response – Fiscal Impacts.

Response to Comment A-14-7. Please see the response to Comment A-10-9. Regarding police patrol, please see the Master Response - Fiscal Impacts.

Response to Comment A-14-8. The RDEIR section analyzes the effects of bicycle and pedestrian travel on study intersections in Isla Vista at pages 4.13-94 through 97, including Tables 4.13-9 and 42. Mitigation for impacts to vehicular, pedestrian, and bicycle traffic is addressed in Impact TRAFFIC-1, 3, 4, 5, 6, 7, and 8.

Response to Comment A-14-9. The RDEIR Transportation Section clarifies the status of the Isla Vista roadway vehicular connections. They are not proposed as part of the LRDP, but were studied as an alternative scenario to determine potential impacts or benefits to traffic operations with the opening of the roadways. (See page 4.13-78, Tables 4.13-1 and 10, and page 4.13-149). The LRDP does include bicycle and pedestrian connections, however.

Response to Comment A-14-10. To determine the appropriate timing and phasing of improvements, a mitigation monitoring program, included in LRDP Mitigation TRAFFIC-1A, will be implemented as part of the LRDP. As noted on page 4.13-129 of the RDEIR Transportation Section, impacted roadway segments within the City of Goleta are not within the jurisdiction and responsibility of the University; therefore, the University has no control over when such improvements will be implemented. However, as outlined in pages
4.13-119 to 129, the University will be required to contribute fair share payments toward such improvements. In addition, Mitigation Measure TRAFFIC-1A(1) has been amended as shown in response to comment A-12-46.

Response to Comment A-14-11. LRDP Impact TRAFFIC-10 and LRDP Mitigation TRAFFIC-10A acknowledge parking impacts in Isla Vista as part of the proposed LRDP and identify the impacts as significant and unavoidable. As stated in the Draft EIR, this impact could be mitigated through a resident parking permit and enforcement program. Without this program, the University would not be able to monitor student, faculty, or staff parking in Isla Vista. Since this program has not been adopted by the California Coastal Commission, this impact is significant and unavoidable.

Response to Comment A-14-12. LRDP Impact TRAFFIC-10 and LRDP Mitigation TRAFFIC-10A acknowledge parking impacts in Isla Vista as part of the proposed LRDP and identify the impacts as significant and unavoidable. Instead of prohibiting certain students from bringing cars on campus (and thus shifting parking demand—and associated environmental impacts—to neighboring communities), this impact could be mitigated through a resident parking permit and enforcement program. Without this program, the University would not be able to monitor student, faculty, or staff parking in Isla Vista. Since this program has not been adopted by the California Coastal Commission, this impact was identified as significant and unavoidable. The University has adequate parking supply on-campus to accommodate parking demand as shown in Table 4.13-13 in the RDEIR section.
Alissa Hummer  
Campus Planning and Design  
Facilities Management  
c/o Vision 2025  
UC Santa Barbara, CA 93106-1030

June 19, 2008

RE: Comments on Draft Environmental Impact Report for UCSB Long Range Development Plan Section 4.15 Wastewater

Dear Ms. Hummer:

This letter is submitted by the Goleta Sanitary District (GSD) in response to your draft environmental impact report (EIR) for UCSB’s long range development plan (SCH No. 2007051128). The GSD has focused its review on Section 4.15 that deals exclusively with sewer service and wastewater treatment.

The following comments submitted by GSD are based on the March 2008 version of the EIR.

1) The GSD would like to point out that several discrepancies within Section 4.15 exist between data described in the narrative and numerical results presented in tables 4-15.1, 4-15.6 and 4-15.7. The District recommends that UCSB correct these discrepancies and submit this section for review.

2) Section 4.15.1.1 Study Area, mislabels the Goleta Sanitary District Boundaries figure as Figure 4.14-1. It should be identified in the text as figure 4.15-1. Figure 4.15-1 obtained from SB County Public Works Department, updated 4/28/03, is now outdated and does not show areas that have since been annexed to the GSD. A more recent map is available from the surveyor’s office of the Santa Barbara County, dated September 2007 that should be used in this planning document.

3) The EIR projects that upon completion of all the proposed long range development the wastewater flows from the University will exceed their allotted capacity at full build out. The university offers two mitigation measures to mitigate the significance of this impact on the environment.

   a) The first mitigation, WW-1A, would request that GSD and GWSD apply to the RWQCB to modify or re-issue each district’s NPDES permit. GSD would like to clarify that only one NPDES permit governs capacity issues at the wastewater
treatment plant and that permit is held by GSD who is the owner and operator of the treatment and disposal facilities. Any applications to the RWQCB to increase treatment capacity would have to be initiated by GSD. GWSD does not have a permit with the RWQCB for either treatment or discharge of wastewater into the Pacific Ocean.

Furthermore, the GSD is in the process of upgrading the level of treatment at the wastewater treatment plant with no plans for increasing capacity. This project is required by the RWQCB in accordance with a settlement agreement between GSD and the RWQCB dated November 2004. The upgraded treatment facility will be completed and operational by November 2014. At this time the Facilities Planning Study has been completed, and the draft environmental documents are being circulated for public review. Both of these documents do not contemplate any increase in the treatment capacity of GSD’s facilities. In order to maintain compliance with the settlement agreement mentioned above, GSD will not be in position to request from the RWQCB any increase in capacity as part of the currently ongoing project. Any increase in capacity that is deemed necessary will have to be separate from this project and should not impact the progress and completion of the upgrading project.

b) The second mitigation measure WW-2B suggests that the University will negotiate the acquisition of additional capacity in the GSD wastewater treatment plant. This negotiation option is viewed as viable by the University based on a capacity study completed by Dudek and Assoc. in January 2006 that concluded GSD would have excess capacity at the proposed full build out of areas within its service boundaries. While the study projects the availability of slight excess capacity, GSD points out those growth projections may not be accurate and GSD does not believe it is prudent to sell any of its remaining capacity based on the results and assumptions made in the referenced Dudek report. GSD intends to retain and preserve its capacity allocation for the needs of its service area.

We appreciate the opportunity to offer you our comments and please do not hesitate to call upon us if you need further information.

GOLETA SANITARY DISTRICT

Kamil S. Azoury, PE
General Manager / District Engineer

Cc: kw
Response to Comment A-15-1. The Wastewater Section (4.15) was recirculated, and addresses all of the comments raised by the Goleta Sanitary District.

The Draft EIR, published in May, 2008, reported current wastewater flows and remaining treatment plant and conveyance capacities taken from the Goleta Sanitary District/Goleta West Sanitary District Wastewater Generation Study, 2006. Just before release of the Draft EIR, more recent information regarding current (2008) wastewater flows, cumulative wastewater generation and treatment plant capacity for the Goleta West Sanitary District became available with the publication of the 2007 Goleta West Sanitary District Wastewater Master Plan. This information has been used to revise the Draft EIR as follows:

- In the previous Draft EIR Wastewater Section (using data from the GSD/GWSD study of 2006), flows were estimated to be 90% of potable water demand. This projection of future wastewater flows following buildout of the 2008 LRDP was based on Section 4.14 of the Draft EIR relating to water supply and demand (since revised). This revised section estimates future wastewater flows using wastewater generation factors derived from the 2007 Goleta West Sanitary District Wastewater Master Plan.
- The estimate of wastewater flows associated with new development was revised to reflect the current status of projects. Please see Table 4.15-5 of the recirculated Wastewater Section, on page 4.15-13.
- Current wastewater flows associated with the Goleta West Sanitary District have been updated based on information provided by the District in October, 2008.
- The conclusions regarding the significance of wastewater impacts after mitigation have changed. Impacts to the Goleta Wastewater Treatment Plant have changed from less than significant to significant and unavoidable, based on the new information provided regarding estimated wastewater generation.

The University has embarked upon an extensive program of infrastructure upgrades through the Main Campus Infrastructure Renewal Project (MCIRP), which would result in upgrades to the natural gas distribution system, potable water distribution system, sanitary sewer collection system, and storm drainage system throughout the Main Campus. The infrastructure renewal project includes the installation of approximately 60,000 linear feet of new and replacement pipelines in a common trench which would be constructed in phases over a three year period. The Main Campus Infrastructure Renewal Project (MCIRP) was the subject of separate environmental review in a Draft Mitigated Negative Declaration (“MND”, June 2007) and is not part of the 2010 LRDP. The MND for the MCIRP, which is hereby incorporated by reference, is available for review at the University’s Office of Campus Planning and Design, University of California, Santa Barbara, Santa Barbara, CA, and summarized in section 4.15.2.3 under Impact WW-2.

In addition, a number of the factual errors identified by the District were corrected in the Recirculated DEIR, including district boundary mapping, status of the NPDES permit, and allotments under that permit.
Memorandum

DATE: May 19, 2008

TO: Mark Nation, General Manager, Goleta West Sanitary District

FROM: Steven A. Amerikaner and Patsy Stadelman

RE: Comments on UC Santa Barbara Long Range Development Plan Draft Environmental Impact Report

As directed by the Board, we reviewed the UCSB Long Range Development Plan (LRDP) Draft Environmental Impact Report, March 2008 (DEIR) as it relates to wastewater services. We recommend the Goleta West Sanitary District forward to UC Santa Barbara the following comments related to the wastewater services analysis:

Page 4.15-1 (second paragraph) – The introduction to the Wastewater section indicates a Main Campus Infrastructure Renewal Project (MCIRP) is being prepared for which a Draft Mitigated Negative Declaration (DMND) was circulated in June 2007. The discussion should include the current status of this project and a summary of the earlier environmental analysis. If the project is not yet approved, the university should consider amending the LRDP Project Description to include this facility upgrade, and should consider including in this EIR a description of the associated environmental impacts.

Page 4.15-1 (first bullet) – The introduction to the Wastewater section indicates the impact of potentially relocating the sewer main serving the campus was identified as a potential issue during the Notice of Preparation and is addressed in the Wastewater section. However, we did not find any discussion of this issue or its potential impacts in the analysis.

Page 4.15-2 (first paragraph) – The last two sentences reflect out-of-date information. UCSB has completed repairs to lift station 559 and again is transporting the wastewater through this rebuilt station. This information and the associated figures in Table 4.15-1 should be updated.

Page 4.15-2 (second paragraph) – We request the last two sentences be clarified as follows:

It provides wastewater collection and treatment services to Goleta and Isla Vista, where many Campus affiliates live. It also serves portions of the West Campus, including the Devereux School Property, and the North and Storke Campus portions of the UC Santa Barbara campus.

Page 4.15-2 (third paragraph) – The paragraph describes several deficiencies of the current conveyance system. It is unclear from the information provided whether the current conveyance system is adequate to accommodate buildout of the 2008 LRDP or whether such upgrades are proposed as part of the 2008 LRDP. A more thorough discussion of necessary upgrades and analysis of potential impacts are warranted.

Page 4.15-2 (last paragraph) – The capacity figures listed for GWSD do not match the figures provided in Table 4.15-1.
Page 4.15-7 – LRDP Impact WW-1 should be revised to indicate that while buildout of the 2008 LRDP, along with buildout of projected development within the service area of the sanitary districts would not exceed the total design capacity of the treatment plant, it would exceed the design capacity to which UCSB has contract rights. Further, the last sentence of the impact statement is incorrect. As indicated in Table 4.15-6, the wastewater from the project would exceed current Central Coast Regional Water Quality Control Board treatment requirements for UCSB-generated flows. Based on these corrections, the finding for LRDP Impact WW-1 should be identified as “Significant.” In addition, it should be noted that the identified Mitigation Measures WW-1A and WW-1B are both within the exclusive jurisdiction of another public agency (i.e., GSD and GWSD, respectively). In the absence of mitigation, the residual impact would be “Significant.”

Page 4.15-8 (last paragraph) – The total projected wastewater flow from residential development listed in the last sentence of this paragraph does not match the corresponding figures in Tables 4.15-2 and 4.15-3.

Page 4.15-9 (last paragraph) – The total projected wastewater flow from academic and other land uses listed in the last sentence does not match the corresponding figures in Tables 4.15-4 and 4.15-5.

Page 4.15-10 (last paragraph) – The last sentence is incorrect. Table 4.15-6 reveals the University’s increased wastewater flows at LRDP buildout in fact exceeds both design and permitted capacity.

Page 4.15-11 (first bullet) – The sentence is confusing, and does clearly distinguish between design capacity and permitted capacity. In addition, the design capacity figure in the first sentence does not match the corresponding figure in Table 4.15-1.

Page 4.15-12 (first bullet under Goleta West Sanitary District) – The capacity figures do not match those in Table 4.15-1.

Page 4.15-12 (third bullet under Goleta West Sanitary District) – Delete the word “between.”

Page 4.15-13 (Table 4.15-7) – The Flows from Additional Development figure for Goleta Sanitary District should be 2.04 MGD, the “high range” estimate described on pages 4.15-11 to 4.15-12. The 2008 Flows by Agency figure for Goleta West Sanitary District does not match the corresponding figure in Table 4.15-1.

Page 4.15-13 (first bullet) – Based on the above correction to Table 4.15-7, the cumulative wastewater flows for the Goleta Sanitary District will exceed the remaining NPDES permit capacity.
Response to Comment A-16-1. The MND for the Main Campus Infrastructure Renewal Project was adopted in June 2007 and is incorporated by reference into the DEIR and is available for review at the University’s Office of Campus Planning and Design, University of California, Santa Barbara, Santa Barbara, CA. The following serves as a project description, followed by a summary of the findings of the negative declaration:

The Infrastructure Renewal Project would result in the installation of natural gas, potable water, sewer and storm drain pipelines at various locations throughout the UCSB Main Campus. The project has been proposed to address utility system deficiencies that seriously constrain operations of the Main Campus. The proposed infrastructure system improvements have been identified to address the following concerns:

- Many of the pipelines that provide the “backbone” of the Main Campus infrastructure system were installed in the 1950's and have exceeded their useful service life.
- Certain utility pipelines have resulted in substantial maintenance and service requirements.
- Potential safety issues exist, or improvements to undersized and/or deteriorated pipelines are required to address regulatory requirements and potential safety-related issues.
- Aspects of the existing infrastructure system can no longer meet the demands of existing development located on the Main Campus.

In addition to the replacement of existing deteriorated or undersized infrastructure, new pipeline segments have been proposed to increase the reliability of existing infrastructure distribution and collection systems. The new pipeline segments would provide looped service lines that are less likely to result in service disruptions due to pipeline maintenance or repair.

The Infrastructure Renewal Project would result in the installation of approximately 39,000 linear feet of new and replacement natural gas, potable water, sewer and storm drain utility lines to improve on-campus distribution and service reliability. The majority of the new infrastructure pipelines (22,100 linear feet) would be for the improvement of the natural gas distribution system. Most of the proposed potable water, sewer and storm drain pipeline improvements would replace deteriorated or inadequate “trunk” lines, which are the major distribution/collection lines in the campus-wide infrastructure network. It is anticipated that the infrastructure improvements to be provided by the proposed Project would be installed over a period of approximately six years.

Most of the proposed utility line segments included in the Infrastructure Renewal Project would be located in existing roadways, parking lots, pedestrian corridors or other open areas on the UCSB Main Campus. In some cases, existing lines would be relocated to avoid replacing lines under existing buildings and to consolidate the location of pipelines in a common corridor.

The evaluation of potential environmental impacts determined that the Infrastructure Renewal Project would not result in environmental impacts regarding the issue areas listed below and that are denoted with a “*”. Environmental issue areas denoted with a “*” were determined to have less than significant impacts. Impacts affecting issue areas denoted with a “✓” can be reduced to a less than significant level with the implementation of mitigation measures identified by this Initial Study.

✓ Aesthetics  * Agriculture Resources  ✓ Air Quality
Biological Resources  ✓  Cultural Resources  ✓  Geology/Soils/Geotechnical
Hazards & Hazardous Materials  ➗  Hydrology/Water Quality  ✓  Land Use/Planning
Mineral Resources  *  Noise  *  Population/Housing
Public Services  *  Recreation  ✓  Transportation/Traffic
Utilities/Service Systems  ✓  Mandatory Findings of Significance

*  No impact  
•  Less than significant impact  
✓  Less than significant with proposed mitigation

Response to Comment A-16-2. Impacts associated with the replacement of wastewater facilities, pipelines, laterals, etc., are addressed by Impact WW-2, and associated mitigation measures, on pages 4.15-15 to -18 of the recirculated Wastewater Section (4.15).

Response to Comment A-16-3. Section 4.15 was recirculated, and the referenced text was deleted.

Response to Comment A-16-4. Section 4.15 was recirculated, and the referenced text on page 4.15-2 (now on page 4.15-3) was clarified according to the commenter’s suggestion.

Response to Comment A-16-5. The Main Campus Infrastructure Renewal Project, which was analyzed in a separate environmental document, is aimed at ensuring infrastructure capacity for wastewater is adequate to remedy existing deficiencies. The RDEIR section acknowledges, in the discussion of Impact WW-2 that the replacement and upgrade of wastewater conveyance systems may be required to serve buildout of the 2010 LRDP. Mitigation is recommended to address potential impacts. The RDEIR section concludes that impacts will be less than significant with Mitigation Measure WW-2A (p. 4.15-15).

Response to Comment A-16-6. Current wastewater flows and remaining treatment plant and conveyance capacities were derived from the Goleta Sanitary District/Goleta West Sanitary District Wastewater Generation Study, 2006. Future wastewater flows following buildout of the 2010 LRDP were based on Chapter 4.14 of the DEIR relating to water supply and demand (since revised, see Master Response - Water). Wastewater flows were estimated to be 90% of potable water demand.

After the wastewater section was written and before release of the DEIR, more recent information regarding current (2007) wastewater flows, cumulative wastewater generation and treatment plant capacity became available for the Goleta West Sanitary District with the publication of the 2007 Goleta West Sanitary District Wastewater Master Plan. Section 4.15 of the RDEIR reflects this more recent information.
June 23, 2008

Alissa Hummer  
Campus Planning and Design  
Facilities Management  
c/o Vision 2025  
UC Santa Barbara, CA 93106-1030

Re: Draft Environmental Impact Report (DEIR)  
2008 UC Santa Barbara Long Range Development Plan (LRDP)  
State Clearing House Number: 2007051128

Dear Ms. Hummer:

The County of Santa Barbara is pleased to submit this response to the Draft Environmental Impact Report (DEIR) for the 2008 University of California, Santa Barbara (UCSB) Long Range Development Plan (LRDP), as referenced above.

The 2008 LRDP is an ambitious plan to implement admirable academic goals. The County of Santa Barbara (County) understands that the State of California demands an educated workforce to maintain its position as a top-tier international economic center and that the proposed 2008 LRDP expansion plans reflect UCSB’s implementation of the mandated California Master Plan for Higher Education system-wide enrollment projections. While understanding the need for the University of California system to increase academic and student capacity, the County also finds that the related direct and indirect growth will be incompatible with the surrounding communities and region, unless effective mitigations are provided. Therefore, it is imperative that UCSB preemptively address and mitigate University growth-related impacts to ensure that both the University and County’s long range strategic goals are achieved.

The 2008 LRDP promises to significantly improve and expand the capacity of the UCSB campus. However, the same improvements and expansions have implications beyond UCSB’s jurisdiction, which is a primary concern of the County. The proposed increases in UCSB student, faculty and staff populations will have growth-inducing impacts on County fiscal, infrastructural, and environmental resources for generations beyond the planning period of the 2008-2025 LRDP. Specifically, the County’s concerns include, but are not limited to, impacts from increased mobility and vehicle trips on the transportation systems that the County constructs and maintains, increased demand for public safety services, such as fire and sheriff, and an increased reliance on other County services, such as public health and administration. It is essential that all
significant impacts resulting from future students, staffing, students' families, and construction of the proposed 2.5 million gross square feet of non-residential development, the 2,331 additional units, and the 5,443 additional bedspaces, as well as service needs for retiring faculty and the social implications associated with campus population growth, be fully mitigated\textsuperscript{1}. The absence of the payment of improvements and ongoing costs to provide services to UCSB's population will result in a continuation and exacerbation of urban decay in the surrounding communities. Furthermore, it is unlikely that the County will be capable of providing the levels of service in the future that have facilitated the University in becoming a world-class institution for higher learning, which will undoubtedly have implications for the University's success in mitigating foreseen impacts of the 2008 LRDP.

The County has determined that the 2008 LRDP DEIR inadequately analyzes and/or mitigates the clear significant impacts associated with the proposed growth and development. The County reviewed and has developed comments on the 2008 LRDP and DEIR which are included as Attachment A and are intended to improve services that strengthen and support the University's proposed plan and produce long-term benefits for both UCSB and surrounding communities. The comments conform to the environmental review process prescribed under the California Environmental Quality Act (CEQA) and apply to the DEIR sequentially by topic. They were developed to facilitate cooperation between UCSB and the County of Santa Barbara to reduce potential impacts to a less than significant level based on accurate and reliable data prior to the certification and adoption of the Final EIR and 2008 LRDP.

Additionally, the County has attached a final study entitled "Fiscal Impacts of University of California, Santa Barbara's Long Range Development Plan" (Attachment B) completed by the County's consultant, Economic & Planning Systems, Inc. (EPS), which discloses fiscal impacts to the County resulting from 2008 LRDP development and growth. In this report, UCSB will find the amount of fees that the County requires to be paid in order to mitigate the impacts associated with the University's growth if the proposed plan is approved. The development impact fees are based upon a fee schedule that the County applies to all development within its jurisdiction. Additionally, the report includes the ongoing costs that the University will need to fund in order to maintain public services; without such payment, Isla Vista and the surrounding communities would likely be subjected to further urban decay and blight.

In June 2007, the County provided comments to UCSB regarding the Notice of Preparation (NOP) and Initial Study (IS) for the LRDP DEIR. The County identified issues of significant concern relative to County services, as well as recommendations to facilitate effective and comprehensive environmental review under the California Environmental Quality Act (CEQA). Under CEQA, an adequate DEIR would analyze and disclose the significance of all potential impacts of the 2008 LRDP, identify a comprehensive range of mitigation measures and

\textsuperscript{1} Table 3.0.9: Proposed additional campus housing-units, Draft EIR, 2008 LRDP &
Table 1.0-1: Summary of the 2008 LRDP, Draft EIR, 2008 LRDP
alternatives to the project description that would eliminate, reduce, or compensate for the significant impacts, and implement mitigations with appropriate monitoring plans through the development and buildout of the proposed 2008 LRDP. As such, the County understands that this environmental analysis depends greatly on information disclosed by neighboring jurisdictions, including the County, to sufficiently mitigate the foreseen impacts on a regional scale. Regrettably, the County’s thorough review has determined that the proposed 2008 LRDP and the DEIR does not address the County’s initial concerns as the mitigation measures and conclusions of the impacts disclosed in both the IS and the DEIR/LRDP are not adequate.

In general, the DEIR impact assessment lacks sufficient foundation, technical data, and detail in the 2008 LRDP project description and environmental setting to be considered adequate. The lack of site-specific and project specific assessment leads to unsubstantiated conclusions regarding the significance of potential impacts.

The County additionally asserts that many of the proposed mitigation measures in the DEIR fail to meet CEQA requirements because they would not reduce significant impacts to less than significant levels, or there is incomplete analysis to substantiate the level of the residual impact and whether the proposed mitigation measures would be effective. In particular, the mitigation measures often rely on the County and UCSB reaching an undefined, unspecified agreement to mitigate significant impacts in the future. While, the County of Santa Barbara continues to support a collaborative approach to addressing regional issues, the proposed mitigation measures to collaborate absent specific agreements and programs are wholly speculative and, therefore, inadequate. Additionally, other mitigation measures simply rely on internal design review of future and/or draft studies, which conflicts with CEQA requirements. All proposed mitigations should include substantial and viable measures that are subject to ongoing monitoring, as CEQA requires.

Finally, the County has concluded that the development and analysis of alternatives fails to comply with CEQA, which requires an EIR to describe a range of alternatives that would avoid or substantially lessen one or more of the project’s significant impacts. Portions of the proposed alternatives are inherently inadequate due to the unrealistic assumptions made in the project descriptions to meet the objectives of the 2008 LRDP. Specifically, each alternative would pose, and often exacerbate, impacts to the County without substantially mitigating the impacts identified as part of the 2008 LRDP/DEIR. Feasible alternatives, which the County outlines in Attachment A, need to be analyzed in order for the DEIR to be adequate.

In the weeks and months ahead, the County anticipates meeting with UCSB to develop a comprehensive agreement that will fully mitigate the impacts the County would bear as a direct and indirect result of the 2008 LRDP. The County is eager to collaborate with UCSB as the 2008 LRDP and DEIR are being revised so that, prior to the adoption phase, an agreement can be reached.
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The County appreciates this opportunity to respond to developments proposed in the 2008 LRDP and mitigations identified in the DEIR. The County’s comments should assist UCSB with revisions needed to the LRDP and DEIR and the development of adequate mitigation measures to reasonably and foreseeably reduce impacts to less than significant levels. The County looks forward to continuing discussions with UCSB.

Sincerely,

[Signature]
John Baker
Assistant County Executive Officer

Attachments:

Attachment A: County of Santa Barbara Comment Letter; DEIR Vision 2025 UC Santa Barbara


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County of Santa Barbara Board of Supervisors, Clerk of the Board

Supervisor Brooks Firestone, Third District, County of Santa Barbara Board of Supervisors
June 23, 2008
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Supervisor Janet Wolf, Second District, County of Santa Barbara Board of Supervisors

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1.0 Introduction

Intro Comment #1.

UCSB released the 2008-2025 LRDP Notice of Preparation (NOP) on May 23, 2007 to inform public agencies and the general public that UC Santa Barbara will prepare a program-level Draft Environmental Impact Report (DEIR) and an amendment to the 1990 Long Range Development Plan (LRDP) for the planning horizon of 2007-2025. The County provided comments to UCSB on June 20, 2007.

Intro Comment #2.

The project description summary indicates that the 2008 LRDP replaces the 1990 LRDP (Pg 2.0-1). The May 2007 NOP indicated that “UC Santa Barbara will prepare a program-level Draft Environmental Impact Report and an amendment to the 1990 Long Range Development Plan (LRDP) for the planning horizon of 2007-2025”. The 2008 LRDP is often referred to as an “update” of the 1990 LRDP in ancillary documents. There appears to be a significant inconsistency as to the purpose and intent of the LRDP, as to if it is to amend or entirely replace the 1990 LRDP. If the 2008 LRDP is an amendment, then the omitted policies of the 1990 LRDP should be analyzed in the LRDP and DEIR and their current inapplicability explained.

Intro Comment #3.

Table 1.0-1 does not list the amount, frequency, duration of current and proposed summer recreation, academic, or other programs. This information should be included as part of the overview of the “physical objectives” of UCSB and analyzed in the DEIR.

Intro Comment #4.

The project background does not discuss an important aspect of the 1990 LRDP which was that the City and County of Santa Barbara along with other citizen associations reached Cooperative Relations and Mitigation Implementation Agreements. These agreements were instrumental in the careful coordination and cooperation regarding critical improvements and programs designed to mitigate 1990 LRDP impacts.

Intro Comment #5.

The proposed LRDP is incorporated in the DEIR as the project description. Because the University has chosen to combine the LRDP into its DEIR as the project description, it serves two distinct purposes: it is a "policy" document upon which the University intends to rely upon to guide its development; and it is the "project description" for the Environmental Impact Report. The LRDP by itself does not contain the specific level of detail on its own to qualify as the sole policy document and must rely on the DEIR to supplement the policy context, particularly given the scope of the physical changes needed in order to accommodate the increased student enrollment and commensurate faculty and staff changes.

Intro Comment #6.
The LRDP DEIR misrepresents that it is a Program EIR; instead the LRDP DEIR is in fact a project EIR. CEQA Guidelines Section 15168 (a) states that a Program EIR must be prepared for a series of actions related “in connection with issuance of rules, regulation plans or other general criteria to govern the conduct of a continuing program....” The LRDP itself, however, does not include rules, regulations, plans or criteria but is instead a document that includes broad policy statements, maps and graphics. The LRDP DEIR does not in fact describe and analyze rules or regulations or criteria but instead analyzes a proposal for a series of specific projects and therefore, is in fact, a project EIR. CEQA requires that the project description be specific and certain enough for the reviewer to understand the coverage of the EIR. CEQA also requires that an EIR specifically list the projects and project components that are considered in an EIR. CEQA Guidelines Section 15124. The LRDP does not provide a specific project description nor list in adequate detail, projects components that will likely be process under the DEIR.

The EIR is self contradictory on whether the EIR will be used as a program or project EIR or both. At one point, the DEIR states that the LRDP does not commit the University to any specific project, but only provides a strategic framework. In section 1.7, however, the DEIR claims that: “Use of the program EIR also enables the Lead Agency to characterize the overall program as the project being approved at that time....if no new or substantially more severe significant environmental effects would occur (pursuant to Section 15162), the activity can be approved as being within the scope of the EIR without having to prepare a new environmental document (CEQA Guidelines Section 15168 (C)). The DEIR refers to CEQA Section 15162, which contains the criteria used to determine if additional analysis is needed for a previously approved project not tiered projects as stated in the DEIR. Reliance upon CEQA Section 15162 is inadequate since the DEIR lacks specificity.

The LRDP EIR, however, is inadequate as a project EIR because it: does not list the projects; does not provide a specific project descriptions for the many projects proposed; does not assess impacts at a project level; does not include enough specificity on mitigation measures for a project level analysis, defers impact analysis to later studies and decisions; and defers identification of specific mitigation measures to later decision points. If UCSB intends to use the LRDP DEIR as a project level EIR, it will have to include much more specific identification of impacts and mitigation measures, as set out in this letter. Due to the facts that: 1) this DEIR is not an adequate project level EIR and 2) that most of the projects considered in the DEIR are large and have potentially significant impacts, these projects will all have to be the subject of later Environmental Impact Reports. If this DEIR is to be used by UCSB as a project EIR, then extensive revisions are necessary. Due to the basic inadequacy and conclusionary nature of the DEIR, it is reasonable to assume that the resulting revisions would require recirculation.

Intro Comment #7.

The absence of adequate comprehensive analysis, accurate identification of impacts, mitigation measures, and monitoring reduces the ability of the County of Santa Barbara to rely on the DEIR for analysis in implementing projects undertaken by the County to mitigate the LRDP’s impacts. For example, the land use maps are not juxtaposed or overlaid with other maps to provide the reader with the ability to distinguish if the proposed policies, land uses, and future developments are in conflict. Also, the DEIR does not propose monitoring for any mitigation. Without sufficient measures to monitor the mitigation during implementation of the 2008 LRDP, there is no way to guarantee ahead of time that foreseen impacts will be mitigated.

Intro Comment #8.
In almost every resource section, the EIR relies on improperly deferred studies and mitigation measures. By declaring that an impact will be the subject of later studies or that mitigation measures will be further “developed,” “adopted” or “refined” based on future studies, the LRDP DEIR conflicts with a basic and clear CEQA prohibition against deferring support for conclusions and findings until after the EIR is certified. Specific examples of such improper deferral are identified throughout this comment letter.

Intro Comment #9.

A table on page 1.0-8 (unnumbered) indicates that the County of Santa Barbara will be the permitting authority for permits requiring encroachments into land under County jurisdiction. The same table does not indicate that agreements for the provision of public safety, other services and transportation improvements will need to be reached.

Intro Comment #10.

The scope of LRDP and DEIR does not analyze or include Embarcadero Hall. The absence of the inclusion of this facility is interpreted to indicate that UCSB intends to seek permits from the County for future development and programmatic activity related to this site.

Intro Comment #11.

The County of Santa Barbara’s role as a responsible agency includes submitting comments under CEQA §15096. The DEIR provides that UCSB will pay the University’s fair share and Development Impact Fees (DIF) to cover costs of off-site improvements in order to feasibly and adequately mitigate impacts. The County is in accord with the University that it should pay development impact fees and on-going operational costs to the County to feasibly and adequately mitigate public service, recreation, and transportation impacts.
2.0 Summary of Environmental Impacts and Mitigation Measures

Summ Comment #1.

The County of Santa Barbara generally supports the objectives of the LRDP, particularly those related to housing, sustainability, and contributing to regional solutions. However, if the impacts of the proposed growth identified in the 2008 LRDP are not fully mitigated to the extent feasible, the proposed plan will contribute negatively to regional issues, such as traffic, housing, open space, and public services.

Summ Comment #2.

The County of Santa Barbara’s comments regarding the adequacy of analysis, levels of significance, mitigation measures, residual level of significance, and supporting discussions are included in the respective sections of this attachment.

Summ Comment #3.

The County of Santa Barbara respectfully asserts that the alternatives section is inadequate. The alternatives section does not analyze reasonable alternatives such as the change in the location, intensity, heights, massing, or uses of proposed improvements to meet the programmatic objectives of the UCSB Strategic Academic Plan as described in Appendix 3.0-2. The County of Santa Barbara’s complete comments on the adequacy of alternatives can be found in Section 5.0: Alternatives of this attachment.

Summ Comment #4.

The County of Santa Barbara finds the DEIR analysis of growth inducing impacts, indirect impacts of economic growth, and impacts to global warming and greenhouse gas emissions to be inadequately addressed and mitigated in Section 6.0: Other CEQA considerations. These impacts are primary concerns to the County and comments are provided accordingly in Section 6.0 of this attachment.
3.0 Project Description

Desc. Comment #1.

UCSB has characterized the 2008 LRDP as the University's "General Plan" similar to that of a city. General Plans typically do not analyze specific projects. In contrast, a general plan analyzes overall land use policies, which are used as the basis for analyzing specific development projects in the future. The DEIR states that "subsequent activities in the program must be examined in the light of the Program EIR to determine where an additional environmental document should be prepared." The County requests that the LRDP and DEIR better describe the project and that the project description be amended to explain the relationship between the "strategic framework" and the projects needed to achieve the goals. State law requires that zoning ordinances and development approvals must comply with a local agency's general plan. The LRDP establishes no comparable requirement that development decisions conform to the LRDP. This is particularly concerning because the DEIR references LRDP policies as a basis for determining that the project's potentially significant impacts will be mitigated. The circular reasoning which the University qualifies as its commitment to mitigations contains ambiguous language and it provides unquantifiable mitigation measures which are purported to reduce impacts to a level of insignificance.

Desc. Comment #2.

The introduction indicates that the LRDP will "guide capital construction and infrastructure development to accommodate a building program for anticipated campus growth", but the project description is ambiguous as it does not provide phasing, measures or milestones to guide construction or infrastructure development.

Desc. Comment #3.

Figure 3-3 does not include Embarcadero Hall within the Campus Boundary. See Intro Comment #10. The legend on Figure 3-4 does not match the hatching for the North Campus.

Desc. Comment #4.

The existing conditions section indicates that the campus has reached the enrollment projections. However, it appears that the 2007-2008 enrollment of 21,410 (page 3.0-6, DEIR) exceeded the UCSB LRDP enrollment growth corridor of 20,000 as described, illustrated, and agreed upon in Exhibit B of the 1990 Mitigation Implementation Agreement between the City and County of Santa Barbara and other parties.

Desc. Comment #5.

The DEIR does not analyze or justify the proposed significant increase of non-residential square footage per student. Under existing conditions, each faculty, staff, or student is allocated 122 gross square feet (GSF) of Academic/Support Space (based on 2007-08 enrollment and faculty/staff head count and 3.8 million GSF). Under the 2008 LRDP, each faculty, staff, or student is allocated 166 GSF at 2025 (based on DEIR Table 1.0-1: Summary of the 2008 LRDP). However, the 2008 LRDP and DEIR does not disclose the justification for this significant expansion and increase in allocation per
person, nor does it limit the population growth regardless of the ability of the non-residential facilities to accommodate addition faculty, staff, and students beyond what is proposed by the 2008 LRDP. Additionally, the 2008 LRDP proposes an 829% increase in faculty and staff housing units for a 37% increase in faculty and staff without provisions to guarantee the new housing opportunities to existing faculty and staff members. The County is concerned that the significant increase in non-residential GSF and the availability of new faculty and staff housing will accommodate unplanned population growth in the future beyond what is analyzed and mitigated in the DEIR. For example, assuming the existing allocation ratio of 122 GSF per faculty, staff, or student, the future development of 6.3 million GSF could accommodate 51,639 people, which is 13,770 additional faculty, staff, and students beyond what is proposed by the 2008 LRDP, not including student/faculty family members or secondary growth inducing impacts. This capacity for additional population poses impacts to regional housing and environmental resources, as the 2008 LRDP and DEIR do not commit to housing this additional population capacity.

Alternative Mitigation Measure that is Adequate and Feasible

The DEIR should disclose the potential for unplanned growth in faculty, staff, and student populations due to increased capacity of non-residential gross square footage (GSF) and faculty/staff housing units proposed by the 2008 LRDP, including the existing ratio of non-residential GSF to service population, the future ratio of non-residential GSF to service population at buildout in 2025, and the implications for total population if the existing ratio non-residential GSF to service population continues toward buildout, as calculated above. To mitigate the potential impacts of unplanned growth, the DEIR should limit faculty, staff, and student population growth to the prescribed growth defined Table 1.0-1 of the DEIR. If these limits are exceeded in the future toward buildout of the 2008 LRDP, the University should be required to develop additional Main campus housing proportional to the population growth to accommodate the additional faculty, staff, and students and avoid their displacement into surrounding jurisdictions.

Desc. Comment #6.

Table 3.0-9: Proposed Additional Campus Housing – Units reports an increase of 2,331 net new units and 4,205 net new bedspaces. However, Table 1.0-1: Summary of the 2008 LRDP reports an increase of 2,113 additional units and 5,443 additional bedspaces. This discrepancy should be resolved throughout both documents. Additionally, the DEIR analyzes assignable square feet (ASF) and gross square feet (GSF) of non-residential development interchangeably. However, the difference between ASF and GSF is 700,000 square feet. This is a significant difference with regard to impacts on resources. For the purposes of the environmental review of the 2008 LRDP, the highest reported numbers should be assumed for the impact analyses of resources that are sensitive to physical development to ensure a “worst-case scenario” mitigation and monitoring program compliant with CEQA.

Desc. Comment #7.

Table 3.0-1 should disaggregate the total percentage of Academic Uses from Administrative and Student Support in order to better assist with understanding the current baseline relative to existing land uses. Table B-1 in the LRDP, Page B.7 indicates that two combined land uses total 21% whereas DEIR Table 3.0-1 indicates it is 19%. The DEIR should additionally disaggregate the Student and Faculty Housing which reported it being 20% of existing land uses. Table B.1 in the LRDP (Page B.7) indicates that two combined land uses total 22%. Please reconcile and provide an accurate disclosure of existing land uses in either the project description or in the 2008 LRDP. Providing existing and
future land use densities for faculty and student housing would be helpful in analyzing the existing baseline and future impacts.

**Desc. Comment #8.**

Please provide a map indicating the general locations of all existing assignable square footage for each program, similar to Figure 3.0-6, which maps Table 3.0-3.

**Desc. Comment #9.**

The existing parking and circulation section does not accurately describe the current baseline conditions with respect to the parking spill over resulting from UCSB paid parking on the community of Isla Vista. The existing parking and circulation section should be revised to include the current impacts of paid parking on campus on Isla Vista as described in the Technical Appendix 4.13-2.

**Desc. Comment #10.**

The “Recreation Fields and Facilities” sections do not indicate that these facilities are made available to the general public and are significant regional recreation assets. Please clarify.

**Desc. Comment #11.**

The project description should disclose the relevance and context of the policies contained in the Joint Proposal for Ellwood-Devereux.

**Desc. Comment #12.**

The Campus Enrollment and Population section indicates that by 2025, there would be an increase to 36,250 people who are “affiliated” with UCSB. The summary does not breakdown existing affiliation nor does it include a definition of “affiliation”, is it meant to include direct and indirect affiliation (i.e. service workers, students, students’ families, etc)? There is no mention of existing and future academic, recreation, special events, and other programs that may generate traffic and other related impacts. This data needs to be included in the project description.

**Desc. Comment #13.**

Please amend Page C.3, Table C-1 in the 2008 LRDP and Table 3.0-4 in the DEIR to report enrollment since the adoption of the 1990 LRDP.

**Desc. Comment #14.**

Table 3.05 reports an 8.3% increase in faculty and staff, yet for the same year, there was only a 1.4% increase in student enrollment. Please explain the significant increase and why it occurred during the 2003-2004 academic year. The LRDP proposes a growth rate of 1% per year, but it is unclear if it is a commitment to a maximum enrollment cap of 25,000 students. As illustrated in the DEIR, the 1990 LRDP maximum student enrollment was and has been exceeded since 2001.

**Desc. Comment #15.**

It is unclear if the 1% increase per year to 25,000 students is inclusive of the 17% increase in graduate students. Please clarify and provide a table with forecasted growth that includes the commensurate
related increase in staff and faculty including the replacement of existing faculty and staff projected to retire during the 2008-2025 planning period.

Desc. Comment #16.

The Campus Planning process appears to be a significant building block of the 2008 LRDP and an outgrowth of the UC Santa Barbara Strategic Academic Plan. It is unclear from the project description if the Campus Plan which the County of Santa Barbara has a copy of is a component of the LRDP. Many of the graphics in the LRDP originate from the Campus Plan. Please indicate if the Campus Plan is a component of the 2008 LRDP.

Desc. Comment #17.

The project objectives articulated are clearly intended to be broad to allow for “flexibility to adapt to changing conditions and future needs”. The lack of specificity results in analysis and contradictory specific mitigation measures that given the broad flexibility of the 2008 LRDP result in an inadequate DEIR. The fifth 2008 LRDP objective includes “Contribute to Regional Solutions”. The County of Santa Barbara applauds UCSB’s recognition, that given the scope of the proposed 2008 LRDP growth, that UCSB participation in contributing to solving regional issues will be essential. However, the proposed additional housing identified in Table 3.0-6 will certainly assist in mitigating the direct growth in enrollment and additional faculty and staff, but will not mitigate the indirect impacts identified in the DEIR Section 6.21: Other CEQA Considerations. It is unknown to what extent proposed housing will accommodate the 36,250 people “affiliated' with the University. Proposed housing should not only be sufficient to accommodate additional students, faculty, and staff but should also take in existing students to on campus living facilities to offset the indirect demand for housing created through indirect job growth resulting from the 2008 LRDP.

Desc. Comment #18.

Section 3.7 provides a general overview of proposed land uses; however, it is unclear what uses and development are permitted in each area. For example, the Academic Use expressly identifies prohibited development, but no corresponding use. The Housing designation identifies prohibited uses, but does not identify prohibited development. The Open Space land use identifies permitted uses, but no mention of permitted development. These examples illustrate the need for consistency of discussion between land uses so it is absolutely clear what uses and development is permitted within each land use designation so that the programmatic impacts can be adequately identified, analyzed, and mitigated to the extent feasible. Figure 3.7 should be modified to include land uses as proposed in the Isla Vista Master Plan.

Desc. Comment #19.

The project description indicates that “Administrative & Student Support” and “Academic Uses” are to be consolidated into one “Academic Uses” category. The section further explains that the 12 acre site of the existing Facilities Management offices and yard is proposed to be designated for Housing. The Facilities Management yard generates a significant amount of trips as part of attending to the maintenance and service needs of UCSB. Where will these facilities be placed? Have the impacts been analyzed? Please clarify accordingly.
Desc. Comment #20.

The building program described in Section 3.0-3.8 provides an overview of the assignable square feet to be added by functional area. However, there is no corresponding link to the land use of where these buildings will be located on the four separate campuses. Figure D-3 in the 2008 LRDP provides a range of gross square feet of buildings located in the various building envelopes. If the highest end of the range is assumed for each building site, the total square footage, gross and assignable, would exceed the amount of square footage identified in Table 3.0-8. Please provide a more adequate description and amount of building square feet per building site linked to land use. The buildings identified as being removed and listed in Appendix 3.0-3 are proposed to be mitigated with Mitigations CULT-1 through 4. Please see the County of Santa Barbara’s comments under section 4.5.

Desc. Comment #21.

The project objectives stated in Section 3.6 of the DEIR should take into account comments provided for Section 4.10: Population and Housing and Section 5.0: Alternatives 3.0-3.6 relative to housing and adjusted accordingly. UCSB needs to analyze alternatives of providing more housing on campus in order to mitigate the indirect impact of creating jobs and the associated demands on regional housing. UCSB should provide housing for a large majority the student population and should locate housing on the main campus to minimize impacts.

Desc. Comment #22.

There appear to be inconsistency between Table 3.0-9 in the DEIR and LRDP table D-3. The total removed in table D-3 is 1,036, when Table 3.0-9 indicates 1,294. Therefore, the new number of units is also inconsistent. Specific commitment should be made to utilize water efficient landscaping and runoff quality controls (both source control and treatment control measures). UCSB should commit to funding installation and maintenance of treatment control systems in all new infrastructure projects so as to control transport of solids (trash) into adjacent wetlands (Campus Lagoon, Devereux Slough, Goleta Slough, etc.).

Desc. Comment #23.

The description does not include some of the important technical data contained in Appendix 4.13-1 which is required in order to have an adequate project description.

Desc. Comment #24.

UCSB indicates that one of the objectives is to “Continue to implement a variety of alternative transportation programs including bicycling, carshare, vanpools, transit, etc”. Figure 3-12 proposed new bicycle paths. However, it is unclear how the bicycle paths will integrate with paths in Isla Vista as identified and proposed in the Isla Vista Master Plan. New bicycle paths integrating into Isla Vista’s street network on the East may create conflicts with the North-South traffic in Isla Vista. New bicycle paths on the West of Isla Vista may spur the creation of new paths in and around Del Sol and Camino Corto Open Spaces which may impact sensitive resources.

Desc. Comment #25.

New pedestrian paths through the greensward terminate on the south-west end along El Colegio which will place pedestrians at mid block locations, creating potential pedestrian conflicts with automobiles,
unless new crosswalks and signals are proposed. New pedestrian paths on the West end of Isla Vista may impact sensitive resources in Del Sol and Camino Corto.

**Desc. Comment #26.**

The technical traffic analysis does not adequately address nor study the proposed connections on the East side of Isla Vista with the Main UCSB Campus. See comments under Section 4.13 et seq. for further detail.

**Desc. Comment #27.**

The proposed parking standards per beds is clearly under the amount of parking required within the County of Santa Barbara’s jurisdiction and will exacerbate the spill over of parking from campus into Isla Vista.

**Desc. Comment #28.**

The alternatives section analysis needs to discuss shifting some of the existing and proposed Coastal Access parking closer to coastal access points. LRDP Figure E-3 does not identify the existing stairs on the North-East end of campus near Camus Point as being a “Beach Access” point. These stairways provide key access to beaches in and around Campus Point.

**Desc. Comment #29.**

The DEIR should include a discussion and propose redesigning the replacement storm drain system to address known water quality issues of solids (trash), nutrients, bacteria and oil/grease that would be discharged from the campus into wetlands. These systems are described as “environmentally superior” with no supporting documentation. In addition, elimination of direct discharge to the ocean would make Campus Lagoon the de facto treatment wetlands for virtually the entire campus. Given the habitat of the lagoon, and the species that inhabit it, these impacts need to be addressed. They are not currently discussed. Please refer to comments for DEIR Section 4.3 and Section 4.7.
4.0 Environmental Setting

ES. Comment #1.

Given the potential regional significance of the proposed improvements, the DEIR should analyze and disclose Ventura County planned growth and development to determine the cumulative impacts, particularly related to transportation, population and housing, and air quality.
4.1. Aesthetics

AES Comment #1. 4.1.1.6: Regulatory Setting.

The DEIR notes that UCSB and the LRDP have no legal obligation to apply the visual resources policies from the County of Santa Barbara to the UC property. The University should consider the applicability of these policies in adjacent Isla Vista, especially in light of proposed plans to block eastern and southern views and solar access for parcels located within the 6500-block of Isla Vista. The proposed heights, ranging from 50 feet to 70 feet, for the Ocean Road Development may remove the existing visual and spatial buffer between University operations and County operations.

Alternative Mitigation Measure that is Adequate and Feasible

The DEIR and LRDP must acknowledge intent to maintain visual resources for this area of Isla Vista, including solar access, southern sky views, shade trees and other vegetation buffers, and shadow impacts, with the completion of a massing study to disclose the impacts of increased height on UC property. Upon further analysis of these issues, additional feasible mitigation measures should be identified and included in the 2008 LRDP and DEIR as a means to mitigate potential aesthetic impacts on Isla Vista residents.

(OLRP, page 4.1-21)

AES Comment #2. 4.2.2.3: 2008 LRDP Impacts and Mitigation Measures

This Reference Number is incorrect. The correct number is 4.1.2.3.

(OLRP, page 4.1-27)

AES Comment #3. 4.2.2.3: Impact AES-1 and Mitigation AES-1A:

The DEIR claims that development under the 2008 LRDP would not have a significant impact on critical Main Campus view corridors because existing development “resulted in a conglomeration of structures and public spaces that take only partial advantage of views to the surrounding coastal resources. Existing views of the Pacific Ocean, lagoon, coastline, and Santa Ynez Mountains are precluded in many instances by existing buildings and landscaping.” However, under CEQA, the impacts of existing structures do not preclude the analysis of additional impacts due to increased heights and reconfiguration of structure locations. Only the reconstruction of existing structures in kind and location would not warrant further visual and aesthetic analysis pursuant to CEQA, which is contrary to the 2008 LRDP. For example, the demolition of a 30-foot structure and construction a 70-foot structure in its place would result in aesthetic impacts and would require analysis and mitigation as to the massing and materials of the structure. The intensification and net increase of impacts from the baseline needs to be analyzed. To do this adequately, the DEIR and LRDP must disclose existing building heights, locations, and types on a map similar to Figure D-4 of the LRDP. Without this baseline map, a comparison of the existing and proposed development is impossible..

Alternative Mitigation Measure that is Adequate and Feasible

In the case of LRDP Impact AES-1, the impacts of increased height, increased width, and changed architecture must be analyzed and mitigated through staggered building heights and reduced building heights where impacts are significant. The interior views from existing common areas of existing...
structures, such as the UCSB Library and the UCEN should be considered as part of the existing visual resource stock identified in the DEIR and the LRDP, as these common areas were originally designed to take advantage of the scenic views. Blocking, impeding, or shading these views should be considered significant impacts and mitigated accordingly. 
(RDA, OLRP, page 4.1-27)

AES Comment #4. 4.1.2.3: LRDP Impact AES-2 & Mitigation AES-2A:

Please see the comment for LRDP Impact AES-1 above for discussion of existing structures not providing grounds for dismissal of impacts of the proposed project. In regard to this impact, the architectural style, location, and massing of the proposed structures is never disclosed in the LRDP or the DEIR, though the justification for the mitigation of this impact relies on the LRDP to “allow for appropriate massing and volume of buildings” (DEIR p. 4.1-33).

Alternative Mitigation Measure that is Adequate and Feasible

The University should conduct a structure massing study to adequately analyze the impacts to visual resources resulting from the proposed LRDP structure heights. This type of study would disclose the potential impacts to light, and air to guarantee neighborhood and campus compatibility. It is reasonable to assume that a massing study would identify methods to mitigate the potential impacts to neighborhood compatibility with Isla Vista and existing campus structures to ensure complementary massing, character and landscape architecture.

AES Comment #5. 4.1.2.3: LRDP Impact AES-3 & Mitigation AES-3A:

This proposed mitigation relies heavily on the 2008 LRDP policies for views and aesthetics (page F.11 LRDP). However, LRDP SCEN-5 is a policy that is applicable to both aesthetics and biology. It asserts that “Trees with significant scenic or biological value shall be retained or relocated to the extent feasible, or replaced with a 3:1 ratio.” This policy is not applied to the Open Space Chapter/ESH overlay or the Land Use and Development Chapters of the LRDP.

Alternative Mitigation Measure that is Adequate and Feasible

The 3:1 replacement ratio for trees with biological and/or scenic value should be identified as a LRDP Policy for Biology, Land Use and Aesthetics. 
(OLRP, Page 4.1.35)

AES Comment #6. 4.1.2.3: LRDP Impact AES-3 & Mitigation AES-3A:

Additionally, LRDP SCEN-5 asserts that “Trees with significant scenic or biological value shall be retained or relocated to the extent feasible or replaced with a 3:1 ratio.” Mature trees are biologically valuable, as determined by a certified biologist and/or arborist. As such, the loss of mature trees is a significant biological and aesthetic impact.

Alternative Mitigation Measure that is Adequate and Feasible

This policy should include mature trees, as they provide significant benefits of shade, habitat, aesthetic improvements, and climate cooling.
(OLRP, Page 4.1.35)
AES Comment #7. 4.1.2.3: LRDP Impact AES-4 & Mitigation AES-4A:

This measure does not provide any mitigation for the aesthetic impacts to visual resources at the Storke Campus. Instead, it requests that the UCSB Design Review Committee mitigate the impact of the West Campus development on views at a later date. It is inadequate for this DEIR to defer the impacts of the proposed 40-foot buildings and potential impacts to block critical view corridors to the Santa Ynez Mountains.

Alternative Mitigation Measure that is Adequate and Feasible

To mitigate this significant impact, UCSB shall stagger building heights and provide view corridors between structures and vary placement of building footprints to avoid impacts to views of Santa Ynez Mountains from areas near El Colegio Rd. Structures should use non-reflective materials and landscaping should be designed to complement view corridors.

(RDA, OLRP, page 4.1-37)

AES Comment #8. 4.1.2.3: LRDP Impact AES-5 & Mitigation AES-5A:

This measure does not provide any mitigation for the visual impacts to West Campus landscapes, including the Santa Ynez Mountains, Devereux Slough and the Pacific Ocean. Instead, it requests that the UCSB Design Review Committee mitigate the impact of the West Campus development on views in the future after a general analysis. It is inadequate to defer the impacts of the proposed 30-foot to 40-foot buildings that would surround the eastern finger of Devereux Slough, essentially creating a wall blocking views of the Devereux Slough from areas east of West Campus and of the mountains from the west of the development.

Alternative Mitigation Measure that is Adequate and Feasible

To mitigate this significant impact, UCSB shall stagger building heights and provide view corridors between structures to avoid impacts to views of Devereux Slough from areas near Storke Rd and Camino Corto Rd and of the Santa Ynez Mountains from Coal Oil Point Reserve. Structures should use non-reflective materials. The visibility of new West Campus buildings shall be mitigated through site design, structure massing and landscaping to complement view corridors.

(OLRP, page 4.1-39)

AES Comment #9. 4.1.2.3: LRDP Impact AES-6 & Mitigation AES-6A:

This measure does not provide any mitigation for the visual impacts to the West Campus landscape. Instead, it requests that the UCSB Design Review Committee mitigate the impact of the West Campus development on views in the future. It is inadequate to defer the impacts of the proposed 30-foot to 40-foot buildings proposed to surround the eastern finger of Devereux Slough, essentially creating a wall blocking views of the Devereux Slough from areas east of West Campus.

Alternative Mitigation Measure that is Adequate and Feasible

To mitigate this significant impact, UCSB shall stagger building heights and provide view corridors between structures and vary placement of building footprints to avoid impacts to views of Devereux Slough from areas near Storke Rd and Camino Corto Rd and of the Santa Ynez Mountains from Coal Oil Point Reserve. Structures should use non-reflective materials. The visibility of new West Campus
buildings shall be mitigated through site design, structure massing and landscaping to complement view corridors.
(OLRP, page 4.1-40)

AES Comment #10. 4.2.2.3: Cumulative Impacts and Mitigation Measures:

The DEIR does not assess public views of the UCSB campus and its current landmarks from public open spaces, such as Goleta Beach, or in consideration of LRDP buildout when viewed from other points on the South Coast. Currently Storke Tower and Francisco Torres, which are the two tallest buildings, are visible from many vantage points on the South Coast, including More Mesa, the Gaviota Coast, Storke Rd, the Santa Ynez foothills, and the Pacific Ocean. New development proposed in the LRDP will be up to 80 feet tall and visible from a long distance. This is a significant impact to regional aesthetics.

Alternative Mitigation Measure that is Adequate and Feasible

To mitigate this impact, the 2008 LRDP should include additional policies requiring the use of non-reflective and/or matte finished exterior materials for all new and redeveloped structures. In addition, site design and landscaping should be used to soften and blend these structures into the existing environment.
(RDA, page 4.1-42)
4.2. Air Quality

AQ Comment #1 AB32

The Air Quality section inadequately includes analysis of impacts to Global Climate Change. Though Section 6.0 Other CEQA considerations provides discussion and analysis of the 2008 LRDP’s impacts and mitigations of impacts to climate change caused by greenhouse gas emissions, this section should address Assembly Bill 32’s requirements regarding the increase and appropriate reductions necessary of greenhouse gases (GHGs) and Senate Bill 97’s requirements regarding the quantification of greenhouse causing emissions, and identification of mitigation measures under CEQA. Specifically, the DEIR should disclose the quantity and type of emissions of GHGs that will be caused by the projects direct and indirect impacts, including construction and increased energy use and impacts caused by increased use of transportation. The DEIR should also include a discussion of all feasible mitigation measures to reduce impacts caused by project caused increase in GHGs, including but not limited to use of alternative energy, funding of mass transit, and design changes that reduces GHGs. In the least, this section should refer to Section 6.0 discussion in its impact analysis.
4.3. Biology

BIO Comment #1. 4.3.1.4 Sensitive Species:

The DEIR identifies a substantial list of sensitive species based on state, federal, and local classifications. Specifically, the Western Snowy Plover is identified as a threatened species that is especially sensitive to the detriment on human invasion of their Sands Beach and Coal Oil Point Habitat. The proposed 1.8 million ASF and 4,200 housing units includes development that lies within approximately 400 feet of known Snowy Plover Habitat that will undeniably pose threats to the Western Snowy Plover populations and their proliferation due to the associated increased UCSB population and activity level. The DEIR does not analyze any potential impacts to the Snowy Plover populations or habitat, nor does it address any impacts to any of the other sensitive species identified as part of this section, other than the Southern Tarplant. To protect these sensitive species, the DEIR must disclose all potential impacts to Western Snowy Plover and other sensitive species populations and habitats. The DEIR, therefore, does not include the substantial evidence required to make a legal finding regarding the significance level of the impacts to these species.

Alternative Mitigation Measure that is Adequate and Feasible

Specifically for the ongoing protection of the Western Snowy Plover, UCSB shall contribute financially and programmatically to the protection of the Snowy Plover Habitat at Coal Oil Point with signage, docents, fencing, and other implements to separate the students, faculty, staff, and visitors from the surrounding habitats and educate these populations to threatened and sensitive species in the vicinity. Examples and specification for these materials should be included in the DEIR as part of this mitigation.  
(OLRP, RDA, page 4.3-19 and page 4.3-25).

BIO Comment #2. 4.3.1.4 Sensitive Species: Monarch Butterfly.

The DEIR identifies UCSB as lying directly along the migration route of the State-protected Monarch Butterfly. The butterfly uses roosts both on and near UCSB property, including eucalyptus, firs, pines, bays, and laurel trees, yet the LRDP and the DEIR rely on a weak policy to protect the habitat of this threatened species. LRDP Policy ESH-4 requires “special consideration and care be given prior to the removal of any significant non-native trees such as eucalyptus and some pine species that are recognized roosting areas for sensitive species” including Monarch Butterflies and sensitive bird species, like the White-tailed Kite.

Alternative Mitigation Measure that is Adequate and Feasible

This policy shall include the 3:1 replacement ratio of trees “with significant scenic or biological value” from LRDP Policy SCEN-5. In order to mitigate potential impacts, LRDP Policy ESH-4 shall be amended to read, “To preserve roosting habitat for sensitive bird species and monarch butterflies, any significant native or non-native trees removed during implementation of the 2008 LRDP, such as eucalyptus and some pine species that provide roosting areas for sensitive species, shall be replaced with native equivalent species at a 3:1 ratio on or off site, consistent with LRDP policy SCEN-5.  
(OLRP, page 4.3-20)
BIO Comment #3. 4.3.1.5: Regulatory Setting:

Under the California Coastal Act, UCSB defines and maps Environmental Sensitive Habitat (ESH) Areas on campus as an overlay to the Land Use map. However, the LRDP and the DEIR never composite the proposed ESH overlay with the land use designations as a comprehensive land use map to guide land use and development. This is an essential juxtaposition, as it identifies unique areas of the very general ‘Open Space’ land use category.

In the final versions of the 2008 LRDP and EIR, the Proposed Land Use Map should display the ESH overlay in detail to include Coal Oil Point Reserve and known sensitive species habitat areas to achieve full disclosure of potential impacts due to proximity of development to biological resources. Without this type of disclosure, the DEIR impact analysis is inadequate. (Also see Comments pertaining to Land Use Section 4.8) (OLRP, page 4.3-25)

BIO Comment #4. 4.3.2.1: Standards of Significance:

The DEIR states that development under the 2008 LRDP would be significant to biological resources if it would interfere substantially with movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. The 2008 LRDP proposes a “greensward” on page F.3 as a “civic space” to “connect the open spaces of the Ellwood-Devereux Coast with the Goleta Slough.” This greensward is largely composed of environmentally sensitive habitat area (ESHA), as shown on Figure 4.3-3 on the DEIR. However, the LRDP treats the greensward as merely “open space for University neighborhoods” and is a “regional amenity for the community”, without acknowledging it as critical to sensitive species and habitat. As such, impacts to biological resources due to increased use of the greensward as a transportation network for bikes and pedestrians, and general open space/trails are not analyzed. Increased noise, traffic, lighting, and human presence in the proposed greensward without mitigation would adversely impact the sensitive species and biological resources in the area, including, but not limited to, the Southern Tarplant, the raptor roosts, the butterfly roosts/eucalyptus woodland, the Coastal Sage Scrub, and vernal pools.

Alternative Mitigation Measure that is Adequate and Feasible

The LRDP should contain policies to ensure the preservation of the proposed greensward in its current natural state as viable habitat to limit intrusion into the habitat to no greater intensity use than 2-lane multi-use pathways, as described in Section 4.13 Transportation and Parking. Filling, dredging, grading, turf, non-native species, recreation fields, and roads intended for automobiles shall be strictly prohibited within the defined greensward. This policy is in the interest of preservation of ESH under the California Coastal Act, the propagation of wetland habitats that are increasingly threatened in California, and the Goleta Slough and Beach, which relies on, or is detriment to, the health of the surrounding wetlands located within the greensward, depending on their treatment and preservation. This policy should be applied and cross-referenced through all applicable sections of the DEIR. (OLRP, page 4.3-29)

BIO Comment #5. 4.3.2.3: 2008 LRDP Impacts and Mitigation Measures:

LRDP Impact BIO-1 and Mitigation BIO-1B, and 1C: Mitigations 1B, and 1C: These Mitigations for Impact BIO-1 are contingent on first finding of potential impacts to aquatic resources, which would then force the implementation of the mitigation. The DEIR does not define criteria to trigger the implementation of the mitigation, and therefore, this mitigation is inadequate.
Alternative Mitigation Measure that is Adequate and Feasible

Construction or operation related to the 2008 LRDP that occurs within 100 feet of a defined aquatic resource shall be mitigated with Mitigations BIO-1A, BIO-1B and BIO-1C. The criteria must be specific and effective, such as the violation of a set buffer, as is achieved in BIO-1D.

(OLRP, page 4.3-30)

BIO Comment #6. 4.3.2.3: 2008 LRDP Impacts and Mitigation Measures:

LRDP Impact BIO-1 and Mitigation BIO-1B, 1C, and 1D: The discussion for this impact and mitigation concludes that a majority of stormwater flows from the UCSB campus to the Goleta and Devereux Sloughs and the Pacific Ocean, but the existing and proposed amounts and quality of the stormwater is never disclosed or analyzed by the DEIR in the Biology or Hydrology section. The amounts and quality of the stormwater emitted to each receiver body of water must be analyzed in this section, or referenced if it exists elsewhere, and analyzed for significant impacts to biological resources accordingly, including the cumulative impacts of the Storke and Main Campus flowing to Goleta Slough and Goleta Beach in the County of Santa Barbara. Also see comments on Section 4.7 Hydrology and Water Quality.

(OLRP, page 4.3-30)

BIO Comment #7. 4.3.2.3: 2008 LRDP Impacts and Mitigation Measures:

LRDP Impact BIO-1 and Mitigations BIO-1B, 1C, and 1D: LRDP Policy ESH-7 is inadequate for separating pedestrians and bicycles from sensitive biological resources and campus because it only "encourages" these parties to remain on trails.

Alternative Mitigation Measure that is Adequate and Feasible

LRDP Policy ESH-7 should be rewritten as “The University shall post permanent signs and distribute information adequately to ensure pedestrians and bicycles remain on existing trails.”

(OLRP, page 4.3-30)

BIO Comment #8. 4.3.2.3: 2008 LRDP Impacts and Mitigation Measures:

LRDP Impact BIO-1 and Mitigation BIO-1B, 1C, and 1D: LRDP Policy ESH-9 protects south-facing ocean bluffs from seawalls, pipes, jetties, and other revetments, but provides no policies for the protection of east-facing bluffs along Lagoon Rd, where erosion rates are most significant. The DEIR must analyze the impacts of potential bluff stabilization of the east-facing bluffs of UCSB including end effects of the structure, the appropriateness of structure design to stabilize the bluff without significant impacts to biological resources, and the possibility of exacerbation of erosion up or down the coast due to changed coastal dynamics. Please see comments in Section 4.5: Geology, Soils, and Geotechnical for discussion regarding coastal armoring. Please ensure that the sections are cross-referenced and mitigation appropriately applied to all sections and impacts.

(OLRP, page 4.3-30)

BIO Comment #9. 4.3.2.3: 2008 LRDP Impacts and Mitigation Measures:

LRDP Impact BIO-1 and Mitigation BIO-1B, 1C, and 1D: LRDP Policies ESH-23, 24, 25 are policies for noise generation to avoid related impacts to wildlife and biological resources adjacent to construction and operation sites. As written, they negate each other. LRDP Policies ESH-23 and 24 establish
construction and operation phase sound level limits at West and North Campus and Coal Oil Point (65 and 60 dBA, respectively). However, LRDP Policy ESH-25 excuses construction and operational sound level limits campus-wide during 7:00am and 8:00pm and from moving sources, such as tractors, and automobiles, during operational and construction phases. Please revise accordingly.

Alternative Mitigation Measure that is Adequate and Feasible

LRDP Policy ESH-25 should apply only to Main Campus. Additionally, noise level restrictions are needed for construction and operation of Storke Campus and adjacent ESH areas, as none are proposed in the 2008 LRDP at this juncture. The creation of these additional policies would mitigate any potential noise impacts to Storke Campus. These policies should be cross-referenced in Section 4.9 Noise.

(OLRP, page 4.3-30)

BIO Comment #10. 4.3.2.3: 2008 LRDP Impacts and Mitigation Measures:

LRDP Impact BIO-1 and Mitigation BIO-1B, 1C, and 1D: LRDP Policy ESH-28 refers to the Illustrative Concept for South Parcel Nature Park, but this document is unavailable for this DEIR. Please provide this document as a technical appendix for the DEIR.

Alternative Mitigation Measure that is Adequate and Feasible

Since the South Parcel Nature Park document is used a means for mitigation, the document itself and required or proposed restoration measures should be included as part of this mitigation to fully reduce this impact to a less than significant level as indicated in the DEIR.

(OLRP, page 4.3-30)

BIO Comment #11. 4.3.2.3: 2008 LRDP Impacts and Mitigation Measures:

LRDP Impact BIO-2 and Mitigation BIO-2B: LRDP Policy ESH-14 requires a replacement ratio of 2:1 on or offsite for any destroyed or compromised native grassland. Due to its threatened status and dependence on undisturbed native grassland, UCSB should make every effort to augment the existing populations of Southern Tarplant on and off site of future developments.

Alternative Mitigation Measure that is Adequate and Feasible

LRDP Mitigation BIO-2B shall apply a minimum replacement ratio of 2:1 to any destroyed or compromised Southern Tarplants, instead of the prescribed 1:1 replacement ratio, because the Southern Tarplant is an indigenous natural feature of regional native grasslands. The minimum replacement ratio of 2:1 is consistent with County Comprehensive Planning under Development Standard BIO-GV-22.2 of the Goleta Community Plan, which states, “A minimum replacement ratio of 2:1 shall be required for significant native habitat areas eliminated. The area to be restored, acquired, or dedicated for a permanent protective easement shall be of comparable biological value to that which is destroyed.”

(OLRP, page 4.3-38)

BIO Comment #12. 4.3.2.3: 2008 LRDP Impacts and Mitigation Measures:

LRDP Impact BIO-3: As prescribed in LRDP Policy SCEN-5, trees with significant “biological value” shall be replaced at a ratio of 3:1.
Alternative Mitigation Measure that is Adequate and Feasible

Under this policy, a mitigation measure for the impacts to active bird nests over the life of the LRDP should include a required replacement of nesting trees at a 3:1 ratio when development requires removal of these biologically significant trees during non-nesting months of the year.

Alternative Mitigation Measure that is Adequate and Feasible

LRDP mitigation BIO-3A appears to be in conflict with mitigation measures and LRPD policies for grading and erosion protection. The DEIR shall clarify which mitigation measure takes precedence, which should be habitat protection in all cases.

(OLRP, page 4.3-40)
4.4. Cultural Resources

CR Comment #1. 4.4: Cultural Resources

Please change all references to the “2007 LRDP and DEIR” to “2008 LRDP and DEIR” for consistency.

CR Comment #2. 4.4 Cultural Resources

The impact analysis for archaeological resources is predicated on the findings of the Archaeological Resources Technical Report prepared by Far Western Anthropological Research Group, Inc. The report, is a Draft document as of March 2008 (as shown on page 1 of Appendix 4.1-1 of the DEIR Technical Appendices). Draft studies or reports are not appropriate documents upon which to base conclusions in an EIR. Until the Draft Archaeological Resources Technical Report is finalized, the impacts analysis and mitigation proposed as part of this section are invalid and any impact conclusion, mitigation measure or finding regarding mitigation will be inadequate. Please include the final draft of this report in the DEIR appendices. By relying on draft documents, the EIR is improperly deferring the analysis regarding impacts to cultural resources. LRDP Impact CULT-1, 2 & 3

CR Comment #3. LRDP Impact CULT-1, 2 & 3

This impact recognizes that the proposed 2008 LRDP could damage or destroy archeological resources and this impact is significant under the DEIR thresholds. The proposed mitigations are insufficient in that “Avoidance” is the most accepted means to protect archeological resources and the proposed growth is over areas that have not been surveyed. This may result in major reconfigurations of proposed development resulting in major inconsistencies with policies stated in the 2008 LRDP. A more thorough analysis and final document must be completed and submitted throughout the campus property to account for historic structures and historic context. Upon additional analysis, appropriate mitigation measures shall be included in the DEIR and LRDP policies, as needed, and pursuant to CEQA and the Secretary of Interior standards.

CR Comment #4. LRDP Impact CULT-4

This impact recognizes that the proposed 2007 (2008?) LRDP could impact the significance of a historic building or structure by altering its architectural character. The proposed mitigation measures are inadequate in that the structures proposed to be removed have not been fully analyzed, since avoidance is the most acceptable method when dealing with historic resources. This could preclude development proposed as part of the 2008 LRDP. These and existing resources, such as Storke Tower, should be analyzed with respect to the context of the campus and South Coast area. The DEIR notes which buildings will be removed/altered and new construction and redevelopment on University owned property. As noted above, the analysis needs to be completed at this time to adequately assess potential impacts.

The proposed impacts are based on a Historic Resources Sensitivity Study (Appendix 4.4-2). The sensitivity study methodology and research states that it did not include any additional research to place campus architecture, planning and development into a broader historic context. In addition, it further states that no site or building specific research was conducted to assess potential significance of individual buildings or structures for their association with important historic events, trends or persons. Furthermore, the data included in the study was provided by UCSB Campus Design and Planning.
Facilities. This study needs to evaluate the potential historic impacts resulting from new development adjacent to Isla Vista and the existing structures on the Devereux property. The DEIR should evaluate impacts to historic resources in an objective manner that seeks to avoid impacts when feasible.

**Alternative Mitigation Measure that is Adequate and Feasible**

The existing structures on UCSB property that have a potential to qualify as historic resources should be identified and considered as part of the 2008 LRDP DEIR. If any potentially historic resource is proposed to be demolished as part of the 2008 LRDP, the loss of the historic resource should be analyzed and impacts disclosed and mitigated. A more thorough analysis and proposed mitigation measures consistent with CEQA and the Secretary of Interior standards should be applied to the DEIR and to policies of the 2008 LRDP.
4.5. Geology, Soils and Geotechnical

GEO Comment #1. 4.5.1.3: Soils:

Figure 4.5-1 discloses soils types across the UCSB property. In order for this map to be instructional to the DEIR analysis, the proposed development must be layered on the map to display the relation of the developments to the soil types. Only in this visualization can the impacts of the 2008 LRDP be adequately assessed. Please produce this map in the revised draft of the DEIR.

(OLRP, page 4.5-5)

GEO Comment #2. 4.5.1.4: Slope Stability: Bluff Erosion:

This section inadequately evaluates potential remediation needed to stabilize the east-facing bluffs along Lagoon Rd. Based on sited studies, the discussion discloses that there is “abundant evidence” that slope failures are a serious concern for the bluffs of main campus, but provides no consideration of the significant impacts of potential coastal armoring, such as seawalls. These impacts could include, but are not limited to:

- Increased erosional stress on the beaches at either end of the armoring, as the prevention of continued erosion at a section of beach causes adjacent beaches to share a greater proportion of the same erosional stress.
- Diminished beaches at the front of the armoring, caused by the interruption of longshore transport headed south along the coastline. In this potential case, Isla Vista, which is subject to existing bluff retreat rates of 0.5 to 1.5 feet per year, would see significant impacts to geologic resources, in addition to potential loss of life and property.
- Accelerated downshore erosion if the revetment, seawall, or other form of coastal armoring protrudes into the active beach and/or surf zones, which disrupts longshore sediment transport to southern beaches and bluffs. In this potential case, Goleta Beach, More Mesa, and Hope Ranch would be subject to increased erosional stress and would see significant impacts to geologic resources, in addition to potential loss of life and property.

Alternative Mitigation Measure that is Adequate and Feasible

As mitigation to this potentially significant impact, LRDP policy GEO-4 shall be modified to state “UCSB shall avoid coastal armoring of the east-facing bluffs of Main Campus, unless coastal erosion threatens the stability and safety of structures existing as of 2008.” LRDP GEO-9 shall be modified “To avoid coastal armoring, UCSB shall enforce LRDP Policy GEO-7, which requires new structures be setback from the bluff to maintain the proposed structure for at least 100 years without coastal armoring.” If coastal armoring becomes necessary to protect life and property on the UCSB campus, 2008 LRDP policy SH-1 shall apply to any bluff structure proposed, amended to include that the structure must be designed to avoid all impediments to longshore sediment transport to avoid any geologic impacts to the County-owned lands of Isla Vista, More Mesa, Hope Ranch, or Goleta Beach under the advice of a registered engineering geologist.

(OLRP, page 4.5-6)

GEO Comment #3. 4.5.1.4: Slope Stability: Bluff Erosion:

This section asserts that efforts are in place to direct water and people away from the bluff edge, which include storm drains and staircases. However, the DEIR and LRDP does not disclose where these
structures are proposed and under what work effort/plan (i.e., existing or proposed under the 2008 LRDP). Please disclose the correct location of existing and proposed staircases and drainage pipes in the geology section of the DEIR.

(OLRP, page 4.5-6)

GEO Comment #4. 4.5.1.6: Seismicity:

This section states that for purposes of implementing the Alquist-Priolo Earthquake Fault Zoning Act (APEFZA), a 50-foot buffer is required around active faults and development shall not be permitted unless the absence of active fault branches within this buffer is proven by geologic investigation. LRDP Policy GEO-1 enforces this buffer, but at this point, it appears that proposed structures lie within 50-foot of the active faultlines disclosed in DEIR Figure 4.5-2. Please disclose location of proposed development relative to the faultlines.

Alternative Mitigation Measure that is Adequate and Feasible

Additionally, LRDP Policy GEO-1 should state that development which must be relocated to avoid the 50-foot faultline buffer shall not be developed on Environmentally Sensitive Habitat Areas (ESHA) or open space land use areas as proposed by the 2008 LRDP.

(OLRP, page 4.5-7)

GEO Comment #5. 4.5.1.6: Seismicity:

DEIR Figure 4.5-2 discloses faultlines across the UCSB property. In order for this map to be instructional to the DEIR analysis, the proposed development must be layered on the map to display the relation of the developments to the fault lines. Only in this graphic representation can the localized development impacts of the 2008 LRDP be adequately assessed. Please provide this map in the revised draft of the DEIR.

(OLRP, page 4.5-10)

GEO Comment #6. 4.5.1.3: Liquefaction:

DEIR Figure 4.5-3 discloses liquefaction potential across the UCSB property. In order for this map to be instructional to the DEIR analysis, the proposed development must be layered on the map to display the relation of the developments to the liquefaction potential. Only in this graphic representation can the localized development impacts of the 2008 LRDP be adequately assessed. Please provide this map in the revised draft of the DEIR.

(OLRP, page 4.5-15)

GEO Comment #7. 4.5.2.3 LRDP Impact GEO-1 & GEO-1A:

LRDP Policy ESH-9 protects south-facing ocean bluffs from seawalls, pipes, jetties, and other revetments, but provides no policies for the protection of east-facing bluffs along Lagoon Rd, where erosion rates are most significant. The DEIR shall analyze the impacts of potential bluff stabilization of UCSB’s the east-facing bluffs including end-effects of the structure, the appropriateness of structure design to stabilize the bluff without significant impacts to biological resources, and the possibility of exacerbation of erosion up or down the coast due to changed coastal dynamics.

Alternative Mitigation Measure that is Adequate and Feasible
As mitigation to this potentially significant impact, LRDP policy GEO-4 shall be modified to state “UCSB shall avoid coastal armoring of the east-facing bluffs of Main Campus, unless coastal erosion threatens the stability and safety of structures existing as of 2008.” LRDP Policy GEO-9 shall be modified “To avoid coastal armoring, UCSB shall enforce LRDP Policy GEO-7, which requires new structures be setback from the bluff to maintain the proposed structure for at least 100 years without coastal armoring.” If coastal armoring becomes necessary to protect life and property then LRDP policy SH-1 shall apply and be amended to include language that the armoring structure must be designed to avoid all impediments to longshore sediment transport. This will avoid any geologic impacts to the County-owned lands of Isla Vista, More Mesa, Hope Ranch, or Goleta Beach under the advice of a registered engineering geologist.

(OLRP, page 4.5-18)

GEO Comment #8. 4.5.2.3 LRDP Impact GEO-1 & GEO-1A:

LRDP Policies SH-1 and GEO-3 provide policies for potential bluff revetments, yet they are in conflict with each other. SH-1 states that seawalls may be used when there are no less environmentally damaging alternatives, and GEO-3 states that “no development shall be permitted on the bluff face, except for staircases or access ways to provide public beach access and pipelines for instructional or research-oriented use. These LRDP policies should be modified to be internally consistent.

Alternative Mitigation Measure that is Adequate and Feasible

LRDP Policy GEO-3 should be modified to allow for coastal armoring should failures in cliff stability pose significant treats to life or existing structures as of 2008. Coastal armoring should only occur in extreme circumstances where no less environmentally damaging alternatives are feasible. In this case, LRDP Policy SH-1 shall take precedence, as amended according to the above comments.

Furthermore, the DEIR relies on several LRDP Policies regarding to address bluff stability. LRDP Policies GEO-5, 6, and 7 are unclear and in no way mitigate potential bluff instability resulting from 2008 LRDP growth and development. Specific bluff setbacks should be established in the LRDP Policies and DEIR.

GEO Comment #9. 4.5.2.3 LRDP Impact GEO-2 & GEO-2A:

The DEIR claims that no mitigation is needed for impacts of seismic ground-shaking as the UC Seismic Safety Policy requires structures comply with California State Building Standards Code, or local restrictions. The DEIR does not consider local restrictions of jurisdictions other than UCSB. UCSB construction standards are not disclosed or referenced by this document. To comply with the law, the local seismic safety code must be analyzed compared to the State Code and the stricter code must be adopted as part of the LRDP. Please provide this analysis in the DEIR.

(OLRP, page 4.5-20)

GEO Comment #10. 4.5.2.4 LRDP Impact GEO-5 & Mitigation GEO-5A: Cumulative Impacts and Mitigation Measures:

This impact is deemed less than significant by the DEIR. This determination is inadequate due to the following DEIR shortfalls: Failure to disclose the relationship between proposed development and its location in proximity to known geologic hazards, lack of analysis of potential impacts caused by foreseeable coastal armoring, failure to analyzed proposed development or redevelopment at or near the blufftop, and failure to disclose or analyze the amounts, types, sources, and outputs of runoff. The resulting cumulative impacts include, but are not limited to, bluff erosion, interruption of longshore sediment transport.
sediment transport, and loss of coastal habitat, property, and life in County-owned Isla Vista, Goleta Beach, More Mesa, and Hope Ranch. The conclusion of significance of residual impacts is not supported by the technical analysis, proposed mitigation, and/or policies.

**Alternative Mitigation Measure that is Adequate and Feasible**

Please analyze and mitigate cumulative impacts to these areas presuming that development of the 2008 LRDP will result in coastal armoring, encroachment of development into bluff setback and increased stormwater runoff.

*(OLRP, page 4.5-22)*
4.6. Hazards and Hazardous Material

HAZ Comment #1. 4.6.1.2: Regulatory Context:

Occupancy Safety and Health Administration (OSHA): This discussion incorrectly claims OSHA regulates "hazardous materials and potentially hazardous conditions." OSHA actually regulates employee safety in regards to their possible exposure to hazardous materials. Please adjust language accordingly.
(Fire page 4.6-2)

HAZ Comment #2. 4.6.1.2: Regulatory Context:

Resource Control and Recovery Act of 1974 (RCRA). This is not the controlling law in California. This section should disclose that The U.S. Environmental Protection Agency (EPA) has delegated the implementation and enforcement of RCRA to the State of California. As such, the State has delegated its authority to the Santa Barbara County Fire Department as the Certified Unified Program Agency (CUPA) for the County of Santa Barbara in the form of Health and Safety Code (H&SC), Division 20, Chapter 6.5, Hazardous Waste Control law (25100 thru 25250.28), which is the required compliance law for UCSB. Please adjust language in this section to reflect these details for the County of Santa Barbara, as the Santa Barbara County Fire Department (SBCFD) provides service to UCSB.
(Fire, page 4.6-2)

HAZ Comment #3. 4.6.1.2: Regulatory Context:

Hazardous and Solid Waste Amendments of 1984 (HSWA). This is not the controlling law in California. H&SC 25280 et seq. is the law in CA. As such, the State has delegated its authority to the Santa Barbara County Fire Department as the Certified Unified Program Agency (CUPA) for the County of Santa Barbara. Furthermore, the removal of Underground Storage Tanks (USTs) is overseen by the CUPA. If contamination is found during removal, the site is referred for oversight of clean-up activities to the LUFT program in the SBCFD. The "local County Department of Environmental Health" does not handle hazardous materials in the County of Santa Barbara. Please adjust language in this section to reflect these details for the County of Santa Barbara, as our Fire Dept. provides service to UCSB.
(Fire, page 4.6-3)

HAZ Comment #4. 4.6.1.2: Regulatory Context:

Lead-Based Paint and Asbestos Standards. Please add language to this section to reflect that the Santa Barbara County Fire Department CUPA is responsible for compliance with appropriate California hazardous waste disposal laws and regulations applicable to these specific wastes.
(Fire, page 4.6-3)

HAZ Comment #5. 4.6.1.2: Regulatory Context:

Title 22, California Code of Regulations. Please add that Title 22 is implemented by the Santa Barbara County Fire Department CUPA.
(Fire, page 4.6-4)
HAZ Comment #6.  4.6.1.2: Regulatory Context:

California Health and Safety Code Sections 25500 et seq.: Please add that these sections are often referred to as “the Business Plan law”
(Fire, page 4.6-4)

HAZ Comment #7.  4.6.1.2: Regulatory Context:

Title 40 CFR Part 112, Oil Pollution Prevention: Please add that these sections are often known as the "Aboveground Storage of Petroleum Act" and that H&SC 25270 et seq. became effective 1/1/2008. This program is now implemented as a part of the CUPA. The Spill Prevention Control and Countermeasures Plan (SPCC) for the University will require updating prior to August 2008 under this amendment. The UCSB SPCC was last revised August 2003 and needs to be reviewed and updated every 5 years, per Title 40 CFR Part 112.5.
(Fire, page 4.6-6)

HAZ Comment #8.  4.6.1.2: Regulatory Context:

California Accidental Release Prevention Program (CalARP). Please disclose in this discussion that Future development, research and laboratory projects may potentially include the use of regulated substances under CalARP.

Alternative Mitigation Measure that is Adequate and Feasible

The University shall notify the CUPA to ensure proper regulatory issues are addressed prior to bringing CalARP regulated chemicals on site to mitigate this potential impact to a less than significant level.
(Fire, page 4.6-6)

HAZ Comment #9.  4.6.1.2: UC Santa Barbara Programs, Policies and Procedures:

The implementation of the Integrated Hazardous Materials Management System (IHMMS) has since been transferred to the Santa Barbara County Fire Department, as this department is the CUPA for the County. Please change this section to read, “management efforts in Santa Barbara County by the CUPA…”
(Fire, page 4.6-7)

HAZ Comment #10.  4.6.1.2: UC Santa Barbara Programs, Policies and Procedures:

University Emergency Response: The University Emergency Response Team works in conjunction with the Santa Barbara County Fire Department. Please include this fact in this section.
(Fire page 4.6-7)

HAZ Comment #11.  4.6.1.2: UC Santa Barbara Programs, Policies and Procedures:

University Emergency Response: Please note that the plan was submitted to the CUPA for oversight, approval and inclusion into the Santa Barbara County Hazardous Materials Emergency Response Area Plan. This is a requirement of the Business Plan law. Please also note that any incident is reported to the CUPA for appropriate follow-up.
(Fire, page 4.6-7)
HAZ Comment #12. 4.6.1.2 UC Santa Barbara Programs, Policies and Procedures:

UCSB Emergency Operations Plan (EOP): Please note that the primary purpose of the EOP is to provide an area-wide overview of procedures for various campus emergencies.
(Fire, page 4.6-7)

HAZ Comment #13. 4.6.1.2: UC Santa Barbara Programs, Policies and Procedures:

UC Santa Barbara Chemical Hazardous Waste Disposal Procedure: Please add to this section that the University has the required Santa Barbara County Hazardous Waste Generator permit issued by the CUPA and is inspected for compliance with all applicable laws and regulations by the CUPA.
(Fire, page 4.6-8)

HAZ Comment #14. 4.6.1.3: Existing Conditions: Hazardous Chemicals.

This section does not fully disclose all critical details in the assessment of hazardous chemicals produced, transported, and stored by UCSB. The University currently has an operating hazardous waste treatment system and has released notification for a 2nd treatment system at a different location on campus. This places the University into the highest tier of the tiered permitting options. They are regulated, not only as a Hazardous Waste Generator, under the Santa Barbara County Hazardous Waste Ordinance, but also as a Permit-By-Rule facility under the Hazardous Waste Control law, with the need for a specific additional inspection. Please disclose this information in full as part of this section.
(Fire, page 4.6-9)

HAZ Comment #15. 4.6.1.3 Existing Conditions: Hazardous Chemicals:

Please disclose the on campus location of the 55-gallon drums referred to in Item #2 of this section. Additionally, please disclose the location and description of the hazmat packaging/storage area of the EH&S Building and the approximate amounts and types of stored hazmat waste on site at any given time. SB County Public Works Community Household Hazardous Waste Collection Center is mentioned on page 4.6-8, but is not identified as the same building used as their storage facility for hazardous wastes, including radioactive and bio wastes. Please address this facility as an H6 occupancy structure and describe what procedures and training are required on site.
(Fire, page 4.6-9)

HAZ Comment #16. 4.6.1.3 Existing Conditions: Hazardous Chemicals:

This discussion should disclose and clarify that the County of Santa Barbara is charged with ensuring compliance with all CUPA program laws and regulations at the University. This rephrasing more accurately depicts the County’s role in enforcement and management of hazardous chemicals.
(Fire, page 4.6-9)

HAZ Comment #17. 4.6.1.3: Existing Conditions: Hazardous Chemicals:

It is reasonable to assume that additional underground storage tanks (USTs) exist, but are unknown at this point. This section should disclose and clarify that UCSB has removed all of its known USTs. In doing so, the DEIR acknowledges that remediation and removal of unknown USTs in the future is a possibility under the 2008 LRDP.
(Fire, page 4.6-10)
HAZ Comment #18. 4.6.1.3 Existing Conditions: Hazardous Chemicals:

This section should disclose that all aboveground storage tanks at the University are subject to County inspection by CUPA staff.
(Fire, page 4.6-10)

HAZ Comment #19. 4.6.1.3 Existing Conditions: Hazardous Chemicals.

This section should disclose that all aboveground storage tanks should be addressed, regarding monitoring and release issues, in the University SPCC.
(Fire, page 4.6-10)

HAZ Comment #20. 4.6.1.3 Existing Conditions: Hazardous Chemicals:

This section should disclose and clarify that the University has been permitted and inspected as a Hazardous Waste Generator by the local implementing agency, currently the Santa Barbara County Fire Department, since the adoption of the Santa Barbara County Ordinance 18-31.1.
(Fire, page 4.6-10)

HAZ Comment #21. 4.6.1.3 Existing Conditions: Hazardous Chemicals:

The DEIR incorrectly reports that the University has been subject to inspections from the CUPA since 2001. In fact, these inspections have been required since 1996. Please change this date accordingly throughout the DEIR. Additionally, please acknowledge in the DEIR that CUPA is required by State law and regulations to inspect the University’s hazardous materials, not simply that CUPA is contracted to do so, and that these inspections occur at least every three years, if not more often dependent on circumstances. Lastly, please remove the term “only” from the sentence “Inspections since 2001 have indentified only labeling and improper storage violations for hazardous materials containers” and add employee training deficiencies to the list of violations identified during CUPA inspections.
(Fire, page 4.6-10)

HAZ Comment #22. 4.6.1.3 Existing Conditions: Hazardous Chemicals:

This section states that the CUPA anticipates an increase in the frequency of inspections to four times per year. However, in order to inspect, on a three year rotation, each location of the University regulated as one of the CUPA programs with the addition of the APSA requirements, the inspections will have to occur on a monthly basis.

The following items will require additional staff inspection and compliance services by the Fire Department. CUPA staff:

1) Additional locations at the University will be subject to CUPA oversight,
2) The amount of expansion to the University’s R & D laboratories and the subsequent increase in the number and types of chemicals, the specifics of which are not predictable at this juncture,
3) The University has added two hazardous waste treatment processes to its activities on campus in the past three years. The oversight of treatment of hazardous waste requires additional CUPA staff inspection and compliance services. The expansion process can be expected to include more treatment processes, as they are more environmentally friendly as well as more economical for the University.
4) The passage of AB 1130 during the 06-07 legislative calendar, which became effective 1/1/2008, adds the regulation of above ground storage tanks to the 7 other required CUPA programs overseen by the Fire Dept as the CUPA for the County. The University currently
has 26 above ground storage tanks (AST) that will be subject to this additional program. Any additional requirements for backup generator fuel for the new construction will add to the number of ASTs.

The only part of these CUPA programs for which the University provides staff time is the Hazardous Materials Release Response Plans and Inventory (Business Plan [BP]). Under agreement with the CUPA and approved by the California Environmental Protection Agency, the University EH&S staff verify the chemical use and storage on campus for the CUPA. This is a small part of the CUPA programs for which the University requires ongoing inspection and compliance services. However, it requires that the Fire Dept. maintain records of University staff attending bi-monthly training/communication meetings with the CUPA and auditing the activities the University staff oversees to insure their ongoing compliance with the requirements of the BP laws and regulations.

The University, as a handler of hazardous materials, may have accidental releases that would result in the need for follow-up. Over the past three years there have been five accidents involving the release of a hazardous material at the University. An increase in the number of individuals and the locations of storage and usage of hazardous materials can be expected to increase the possibility of accidents.

HAZ Comment #23. 4.6.1.3 Existing Conditions: Biohazardous Materials:

The discussion of animal research lab inspections is more appropriate to the Hazardous Chemicals Section, since the County does inspect animal research labs, but only for the management of chemicals.

HAZ Comment #24. 4.6.1.4 On-and Off-Campus Contamination:

Table 4.6-1 identifies two leaking underground storage tanks (LUSTs) sites and one former military site. This list appears to be out-of-date. Please update accordingly and include this new information in the DEIR analysis. Please note the University may contact SBCFD to obtain additional list of sites for both on-campus and off-campus contamination and update table 4.6-1 accordingly. SMU & LUFT lists include Isla Vista and airport sites.

HAZ Comment #25. 4.6.1.4: On-and Off-Campus Contamination:

Contamination from Historical Military Uses: Please disclose and clarify in the DEIR that additional locations of hazardous materials, including what unexploded ordinance may be discovered as part of the implementation of the 2008 LRDP.

HAZ Comment #26. 4.6.1.4: On-and Off-Campus Contamination:

Contamination from Historical Military Uses: The DEIR reports that in 1994, the Corps coordinated the removal of metals-contaminated soil from the former MCAS sewage plant. It should be noted in the DEIR that this work was not completed under the Site Mitigation Unit (SMU), but was reportedly handled by staff of the SBCFD. The SMU did not exist. The County understands that there were no confirmation samples collected indicating all copper impacts were removed from the site. The closure report from the Corps in the CUPA file for UCSB should be disclosed.
HAZ Comment #27. 4.6.1.7: Sensitive Receptors:

The sensitive receptors identified as significant in the Hazardous Materials Section of the DEIR should be considered the sensitive receptors for Noise, Air Quality, and Water Quality Impacts as well. The DEIR fails to consistently address the impacts to sensitive receptors as defined in this section. *(OLRP, page 4.6-18)*

HAZ Comment #28. 4.6.1.8: Emergency Evacuation:

The DEIR fails to analyze the impacts to safe evacuation when the proposed Ocean Rd development is completed and occupied. As proposed, 543 single, double, and triple occupancy units will be constructed on 10 acres directly adjacent to the 6500-block of Isla Vista to house faculty, staff, family members, and graduate students. This development will increase residential population by anywhere from 543 people at single occupancy to 1,629 people at triple occupancy. Large high density residential neighborhood is served only by two-lane Ocean Rd in the case of evacuation to reach the eastern exit at Hwy 217. The only other evacuation route would involve traversing up to 12 blocks of two-lane streets in Isla Vista along with the 18,339 existing IV residents to reach El Colegio Rd, Los Carneros, or Mesa Rd.

Alternative Mitigation Measure that is Adequate and Feasible

The safety impacts associated with this increase in population should be addressed in this DEIR and mitigated with the construction of physical evacuation controls such as roadblocks and appropriate directional signage to ensure that residents and visitors of the proposed Ocean Road are safely directed to appropriate on-campus evacuation routes, to avoid potential overcrowding of Isla Vista in emergency cases. This measure will ensure that campus populations will not further impede the Isla Vista population from evacuating in the most safe and timely matter in the face of an emergency, such as an earthquake, flood, tsunami, or fire. *(OLRP, page 4.6-18)*

HAZ Comment #29. 4.6.1.8: Emergency Evacuation:

This section of the EIR incorrectly refers the reader to Section 4.5: Geology, Soils and Geotechnical for a discussion of tsunami emergency response, which is incorrect. A discussion pertaining to tsunamis is included in Section 4.7.1.10: Hydrology and Water Quality. Please revise accordingly. *(OLRP, page 4.6-18)*

HAZ Comment #30. 4.6.2.3: 2008 LRDP Impacts and Mitigation Measures:

LRDP Impact HAZ-1 and Mitigation HAZ-1A: The DEIR incorrectly assesses the significance level for LRDP Impact HAZ-1 as less than significant. The policies for hazardous materials do not provide strong enough language to enforce the County’s or the State’s regulations for hazardous material management and disposal as there is no commitment to CUPA or the County of Santa Barbara Fire Department to comply with inspections or disposal coordination. Additionally, the DEIR acknowledges a plan to increase laboratory space and the associated increase of hazardous wastes. However, there is no disclosure of the projected increase in hazardous substance or their impacts on sensitive receptors as a result of this development. Without this quantification, the impact is inadequately assessed and the finding of “less than significant” is invalid.
Alternative Mitigation Measure that is Adequate and Feasible

The DEIR should define how and at one point coordination would occur during implementation of the 2008 LRDP between the CUPA and UCSB to handle, store, and dispose of hazardous materials on campus consistent with current laws and regulations.

(OLRP, page 4.6-21)

HAZ Comment #31. 4.6.2.3: 2008 LRDP Impacts and Mitigation Measures:

The DEIR also states that Impact HAZ-1 would be less than significant because the hazardous materials are “primarily used indoors.” While this may be true the DEIR cannot ignore that hazardous materials are transported and stored on campus, as was disclosed as part of Section 4.6.1.2: UC Santa Barbara Programs, Policies, and Procedures and 4.6.1.3 Existing conditions. As there are no guarantees that laboratory air systems would be separate from other academic spaces, such as offices, hallways, and classrooms, the DEIR fails to analyze the possibility of contamination within buildings and does not mitigate the potential impacts with emergency evacuation systems. These justifications for the finding of “less than significant” ignore evidence presented in the document. Based on the DEIR’s disclosure of the locations, types, and transport of hazardous materials, a full analysis and mitigation of the impacts of these substances and the quantifiable increases proposed as part of the 2008 LRDP is needed prior to certification.

(Fire, page 4.6-21)

Alternative Mitigation Measure that is Adequate and Feasible

The DEIR should mitigate the potential impact of contamination within a laboratory/building by requiring air systems for laboratory space which are separate from common building areas in order to mitigate the potential of contamination. This will allow for containment of released hazardous materials and allow for adequate scrubbing of the laboratory atmospheres prior to release to the environment and would provide mitigation to the possibility of a large area “hot zone”.

Alternative Mitigation Measure that is Adequate and Feasible

Also, additional emphasis on the proper initial and ongoing routine training of all users of hazardous materials, including students, would help mitigate the any significant release problems in the labs and the buildings in which they are located.

HAZ Comment #32. 4.6.2.3: 2008 LRDP Impacts and Mitigation Measures:

LRDP Impact HAZ-1 confirms that implementation of the LRDP would increase use, transport, and generation of hazardous materials on campus. This impact is identified as less than significant due to policies proposed for Hazardous Materials as part of the LRDP. However, the mitigation discussion for this impact only lists LRDP Policies HAZ-1 through HAZ-4 and HAZ-6 as policies to address hazardous waste on campus. It omits HAZ-5 and HAZ-7, which provide policies for North and West campus and the Venoco Site. To fully mitigate the potential impacts of hazardous materials on campus, all applicable policies for hazardous materials must be included and analyzed for their effectiveness in reducing the impact to a less than significant level.

(Fire, Page 4.6-21, 22)

Alternative Mitigation Measure that is Adequate and Feasible

LRDP Policy HAZ-5 and HAZ-7 should be analyzed as part of LRDP Impact HAZ-1.
HAZ Comment #33.  4.6.2.3: 2008 LRDP Impacts and Mitigation Measures:

LRDP Impact HAZ-1 and its proposed mitigation LRDP Policy HAZ-3 should address how UCSB EH&S stores hazardous materials until they are properly disposed of.
(Fire, 4.6-21)

Alternative Mitigation Measure that is Adequate and Feasible

LRDP Impact HAZ-1 and LRDP Policy HAZ-3 should state that UCSB EH&S shall appropriately store and dispose of hazardous waste.

HAZ Comment #34.  4.6.2.3: 2008 LRDP Impacts and Mitigation Measures:

It is reasonable to assume that demolition of structures and all construction activities, including land clearing and excavation may disturb toxic substances in soil or buildings during implementation of the 2008 LRDP.
(Fire, 4.6-22)

Alternative Mitigation Measure that is Adequate and Feasible

The proposed LRD Mitigation HAZ-2A should further clarify that a Phase I and, if needed, a Phase II site assessment will be required prior to all construction activities in order to reduce this impact to a less than significant level.

HAZ Comment #35.  4.6.2.3 2008 LRDP Impacts and Mitigation Measures LRDP Mitigation:

LRDP Mitigation HAZ-2A should require UCSB contractors to obtain Santa Barbara County Hazardous Waste Generator permits through the CUPA and submit a Business Plan, if the use or storage of chemicals over threshold amounts is proposed or anticipated at any time during the construction process.
(Fire, page 4.6-22)

Alternative Mitigation Measure that is Adequate and Feasible

Based on the SBCFD’s past experience, University personnel do not oversee contractors during construction for compliance with all applicable CUPA laws and regulations.  This has proven to be an issue on more than one occasion in the past.  The University should have a policy that requires all contractors who will store for use, use, remove, or in any way handle one or more hazardous materials to contact the Fire Department and obtain all applicable CUPA permits/documentation that is necessary for the duration of their on campus project.  This would ensure that the CUPA is aware of the additional chemicals being brought to the campus, that they are handled properly while on the campus and that they are disposed of properly when they are no longer useful on the campus.  Many of the contractors at any building project use paints and various solvents, even when working on buildings designated as residential.

HAZ Comment #36.  4.6.2.3: 2008 LRDP Impacts and Mitigation Measures:

The mitigation and analysis performed as part of LRDP Impact HAZ-8 is also applicable to LRDP Impact HAZ-2, as it substantiates mitigation of potential demolition and construction contamination and worker safety.
(Fire, 4.6-23)
Alternative Mitigation Measure that is Adequate and Feasible
To fully mitigate LRDP Impact HAZ-2, the analysis and mitigation measures should include the discussion and mitigation proposed as part of LRDP Impact HAZ-8. They are interrelated and must be mitigated in accordance with each other.

HAZ Comment #37. 4.6.2.3: 2008 LRDP Impacts and Mitigation Measures:

The discussion for LRDP Impact HAZ-2 and Mitigation HAZ-2A should clarify the UCSB department responsible for continued monitoring.
(Fire, 4.6-23)

Alternative Mitigation Measure that is Adequate and Feasible

LRDP Mitigation HAZ-2A require UCSB EH&S to continue to monitor chemical uses, purchases and disposal.

HAZ Comment #38. 4.6.2.3 2008 LRDP Impacts and Mitigation Measures:

LRDP Impact HAZ-3 acknowledges the potential to involve emitting or handling hazardous material within a quarter mile of an existing or proposed school. The DEIR identified this to be less than insignificant. However, the DEIR acknowledges that schools (sensitive receptors) lie adjacent to proposed LRDP development. The impacts to these identified sensitive receptors must be mitigated as part of Mitigation HAZ-3A. The analysis does not support the conclusion.
(Fire, 4.6-24)

Alternative Mitigation Measure that is Adequate and Feasible

Since there is a significant potential that weather conditions or mishandling of the materials may contribute to their spread off site, it is reasonable to assume that hazardous materials may be used or encountered within range of sensitive receptors based on the findings of the DEIR and this should be addressed by the environmental review prior to adding more chemical usage and disposal with the proposed expansion projects. Mitigations should address the handling of the chemicals/wastes to prevent offsite consequences or contamination.

HAZ Comment #39. 4.6.2.3 2008 LRDP Impacts and Mitigation Measures:

Mitigation HAZ-3A states that the University’s use of hazardous materials is in a limited capacity, since the programs of study and research at UCSB do not require their intensive or extensive use. However, Table 4.6-1 states that the University disposed of over 218 tons of hazardous waste in 2005. This is not a minimal use of chemicals on campus currently, and the proposed development would only exacerbate the use. The DEIR must consider the possibility of increased transport and amount of hazardous materials or increased need for storage space and propose mitigation accordingly. The analysis does not support the conclusion (see below and also refer to Section 6.0: Other CEQA Considerations).
(Fire, 4.6-24)

Alternative Mitigation Measure that is Adequate and Feasible

Adequate analysis and mitigation should include construction materials, such as asbestos removed from buildings under construction/renovation. There is a significant potential for weather conditions or
mishandling of the materials to contribute to their dispersal offsite. It is reasonable to assume that hazardous materials are not used or encountered in limited capacity based on the findings of the DEIR and this should be addressed by the environmental review prior to adding more chemical usage and disposal with the proposed expansion projects. Mitigations should address the handling of the chemicals/wastes to prevent offsite consequences or contamination.

HAZ Comment #40. 4.6.2.3 2008 LRDP Impacts and Mitigation Measures:

LRDP Mitigation HAZ-6A: The DEIR does not address hired contractor or sub-contractors responsibility to adhere to UCSB or CUPA regulations which may result in increased incidents dealing with hazardous materials and/or violation of UCSB and CUPA regulations.

(Fire, page 4.6-27)

Alternative Mitigation Measure that is Adequate and Feasible

HAZ-6 should include additional language requiring each contractor and sub-contractor, that handles, stores, uses any hazardous material, to apply for a Hazardous Waste Generator Permit from the CUPA and submit an individual Business Plan to the CUPA addressing the duration of the construction/demolition job in which each is involved.

HAZ Comment #41. 4.6.2.3 2008 LRDP Impacts and Mitigation Measures:

LRDP Mitigation HAZ-8B needs to ensure that potential releases and responsible agencies are notified in a timely manner to ensure proper management and clean up. Responsible agencies include the SBCFD and the Santa Barbara County Air Pollution Control District. The term “as soon as possible” does not ensure timely notification. The law requires “immediate” notification of unplanned releases of hazardous materials. The University must continue to comply with this requirement as well as all contractors working on site.

(Fire, 4.6-30)

Alternative Mitigation Measure that is Adequate and Feasible

LRDP Mitigation HAZ-8B should be revised to state that the SBCFD and Santa Barbara County Air Pollution Control District should be notified within 24 hours, unless the release requires calling 9-1-1.

HAZ Comment #42. 4.6.2.3 2008 LRDP Impacts and Mitigation Measures:

LRDP Mitigation HAZ-8B needs to ensure that stockpiled contaminated soil does not contaminate the soil that it is placed on.

(Fire, 4.6-30)

Alternative Mitigation Measure that is Adequate and Feasible

LRDP Mitigation HAZ-8B shall revised to state “All soil stockpiles shall be placed on 20 mil HDPE plastic sheeting and covered with 20 mil HDPE plastic sheeting.”

HAZ Comment #43. 4.6.2.3 2008 LRDP Impacts and Mitigation Measures:

LRDP Mitigation HAZ-8 should clarify that both EH&S and SBCFD should be notified in LRDP Policies HAZ-5 (a) and (c).

(Fire, 4.6-31)
Alternative Mitigation Measure that is Adequate and Feasible

LRDP Policy HAZ-5 items (a) and (c) be revised to require that both EH&S and SBCFD be notified.

HAZ Comment #44. 4.6.2.3 2008 LRDP Impacts and Mitigation Measures:

The County is one of the primary responsible agencies during the future decommission of the Venoco, Inc Ellwood Marine Terminal Site at the Ellwood Mesa by 2016 and, as such, is responsible for the issuance of a demolition/reclamation permit and the monitoring of the facilities removal by the CUPA. The DEIR should clarify that the issuance of the demolition/reclamation permit is subject to environmental review consistent with CEQA in the future and that currently the site is under the scrutiny of environmental review for an offshore land lease extension with the State Lands Commission and for a pipeline. These environmental documents will be crucial to the decommission process as removal and clean-up of the site has inevitable potential for air and water hydrocarbon and heavy metal contamination, improper handling of hazardous materials, and poor or ineffective restoration of the Ellwood habitat. Additionally, the DEIR should clarify that if additional USTs are found on the Venoco, Inc. site, CUPA shall be notified and required permits will be obtained for removal and remediation. (Fire, page 4.6-33)

Alternative Mitigation Measure that is Adequate and Feasible

LRDP Impact HAZ-9 and LRDP Policy HAZ-7 should be strengthened to ensure UCSB contacts and works closely with the County Planning and Development Department, Energy Division for the demolition/reclamation permit needed for the future decommissioning of the site. LRDP Policy HAZ-7 should be modified to state that if additional USTs are found on the Venoco site, CUPA shall be notified and required permits will be obtained for removal and remediation. The DEIR should define and clarify the policies for decommission, including policies that guarantee effective clean up, removal of facilities, and restoration of damaged or disturbed habitat and open space. (Fire, page 4.6-33)
4.7. Hydrology and Water Quality

HYDRO Comment #1. 4.7.1 Environmental Setting

This section refers to implementation and policies in the Faculty and Family Student Housing Open Space Plan (FFSHOP) Environmental Impact Report (EIR) as means to mitigate and reduce impacts. However, circumstances have changed since this EIR was released. As such, the DEIR must note that the Central Coast Regional Water Quality Control Board (CCRWQCB) has issued a letter (dated February 15, 2008) stating intent to “enroll” the UCSB Storm Water Management Plan pursuant to a number of stipulations that would affect new facilities design. Since the UCSB Storm Water Management Plan (SWMP) has not been approved by CCRWQCB, reliance on its provisions as “mitigation” would be speculative unless tied explicitly to the State Phase II General Permit or the CCRWQCB letter. The existing permit requirements are not considered “mitigation” for an identified impact since they are required to be included in any project subject to them. This section should also provide analysis of potential impacts on ESH resulting from the increased runoff once runoff has been quantified.

The University has not vested in its FFSHOP projects, and this new direction is a change in circumstance, the RWQCB directives for “Low Impact Development” need to be addressed explicitly in this DEIR for all LRDP projects. Specific design features and/or guidelines must be discussed and incorporated into the 2008 LRDP and DEIR to demonstrate that proposed projects will be consistent with appropriate regulations.

(Entire Section; Water Agency& Public Work)

HYDRO Comment #2. 4.7.1 Environmental Setting

Since the proposed new development and redevelopment will add more storm-water runoff to the lagoon, the DEIR must present a discussion of water chemistry as well as sediment characteristics and chemistry. This discussion should also be consistent with the Biology section of the DEIR.

(Pages 4.7-1-22-; Water Agency)

HYDRO Comment #3. 4.7.1 Environmental Setting

Section 4.7.1.7 paragraph 1 on page 4.7-14 should reference Table 4-7.1

(Page 4.7-15; Water Agency)

HYDRO Comment #4. 4.7.1 Environmental Setting

The Goleta Slough is listed as an impaired water body (“303(d) listed”) for heavy metals and pathogens (bacteria) by USEPA based on standards promulgated by the State of California. The appropriate standard of comparison includes the CCRWQCB Basin Plan and other guidance documents. Runoff from the LRDP activities contributes to any existing impairment, the impact would be significant. Contributions to Copper and Nickel levels are apparent from Table 4.7-1. This discussion should be incorporated into the Biology Section of the DEIR and impacts to wetlands biota discussed.

(Page 4.7-3; Water Agency)
HYDRO Comment #5.  4.7.1 Environmental Setting

The University should clarify if it has done testing for “Bacteria” in any of its work. If testing has been conducted then it should be provided in order to support the conclusions made in the Impact and Mitigation discussion. The discussion should address the potential of increased nutrient loading, septic runoff and other bacterial sources.  
(Page 4.7-1 through 4.7-22; Water Agency)

HYDRO Comment #6.  4.7.1 Environmental Setting

CCRWQCB has initiated a Total Maximum Daily Loads (TMDL) for bacteria in the coastal areas of Santa Barbara County. This should be discussed and its implications to the impact assessment (and project design parameters/mitigation) made clear.  
(Page 4.7-1 through 4.7-22; Water Agency)

HYDRO Comment #7.  4.7.1 Environmental Setting

By definition, a groundwater occurrence that is not capable of producing useful quantities of water is not an aquifer. Thus, this perched water should not be described as an aquifer.  
(Page 4.7-17; Water Agency)

HYDRO Comment #8.  4.7.1 Environmental Setting

Discussion should be provided about the CCRWQCB regulation of surface runoff from the UCSB campus through the State Phase II General Permit. In particular, the status of this permit application and the implications of the February 15, 2008 letter regarding “enrollment” and additional requirements must be provided.  
(Page 4.7-19; Water Agency)

HYDRO Comment #9.  4.7.1 Environmental Setting

Figures 4.7-3 & 4 should be revised to more clearly illustrate flood hazards pertaining to the University, including the 100 year flood plain. Maps showing more detail are warranted.  
(Page 4.7-20 through 4.7-21; Water Agency)

HYDRO Comment #10.  4.7.1 Environmental Setting

The University’s SWMP has not yet been approved by CCRWQCB. By letter of February 15, 2008 the CCRWQCB stipulated a schedule for “enrollment” of the UCSB SWMP and a number of additional requirements. The implications of this letter on the UCSB SWMP in general, and the LRDP site designs in particular, need to be further discussed.  
(Page 4.7-21; Water Agency)

HYDRO Comment #11.  4.7.1 Environmental Setting

Specific details of site design and construction site management should be discussed to provide a basis for conclusions about impacts and mitigation effectiveness. Without detailed information about the control of non-point sources, treatment of runoff and construction site management, any evaluation of potential impacts would be unsupported and thus speculative. For example, the impact and mitigation of HYD-1 does not discuss impacts from and mitigation of copper from automotive sources.  
(Page 4.7-21; Water Agency)
HYDRO Comment #12.  4.7.2. Impacts and Mitigation

Any contribution to the violation of a water quality standard is a significant impact, particularly where a water body (such as the Goleta Slough) is listed as an “impaired” water body.

This analysis does not explicitly base its evaluation of hydrologic impacts on increases of impermeable surface due to LRDP development. In particular, accurate evaluation of the impacts of “hydromodification” and its mitigation require evaluation of site layout and construction materials as well as placement and sizing of retention facilities. In particular, the CCRWQC B has stipulated (in its February 15th letter) that the first 0.75 inch of rain be retained on any site of new development. No demonstration of, or even discussions of, such measures are provided. This data is available to do such an analysis since the “anticipated amount of impermeable surface that would be added...was likewise quantified” for the analysis of ground water impacts.

(Page 4.7-22-23; Water Agency)

Alternative Mitigation Measure that is Adequate and Feasible

This impact might be mitigated if site design accommodates areas to encourage infiltration and retention of at least the first ¾ inch of any rainfall event. This standard approach is used in many other areas of the state and is a standard measure in Los Angeles and Ventura Counties’ existing SWMPs. It is also part of the CCRWQCB requirements contained in its February 15 letter.

HYDRO Comment #13.  4.7.2. Impacts and Mitigation LRDP Mitigation HYD-1A

The University should prepare a Storm Water Pollution Prevention Plan (SWPPP) for every project under the LRDP since the cumulative acreage of the project (LRDP) is over 1 acre, the cumulative impacts of all construction may be significant (see comment below) and the receiving waters are impaired. The DEIR needs to acknowledge that in the coastal zone impacts must be mitigated to the maximum extent feasible, not just to a level of “not significant” as is required under CEQA.

(Page 4.7-24; Water Agency)

Alternative Mitigation Measure that is Adequate and Feasible

A more effective mitigation approach would be to develop standard techniques applicable to all projects in a university-wide SWPPP and which would address major topics such as erosion control and nutrient leaching from new plantings. Additionally, wash water shall be collected in dedicated containers or lined basins developed specifically for that purpose. Please note that sub-mitigation measures should be numbered for easier reference and clarification.

HYDRO Comment #14.  4.7.2. Impacts and Mitigation: LRDP Impact HYD-2A

This impact must explicitly acknowledge that impervious surfaces such as roadways and parking lots will result in runoff containing trash, oil and grease, heavy metals, nutrients and bacteria. Heavy metals and bacteria are impairments that have caused the Goleta Slough to be on the CWA 303(d) list. Any contribution of heavy metals and/or bacteria to the Goleta Slough would therefore be a significant impact.

(Page 4.7-28; Water Agency)
Alternative Mitigation Measure that is Adequate and Feasible

This mitigation measure needs to be expanded to include removal of all trash, not just sediments. In addition, in order to address the other pollutants that are described in the impact, bioswales need to be installed in the actual treatment control system (downstream of any trash removal devices) and must be sized to provide sufficient retention to treat the pollution loads expected.

While bioswales may prove adequate to treat heavy metals and nutrients, other mechanisms may be necessary to treat bacteria. In order to conclude that impacts are 1) not significant and 2) mitigated to maximum extent feasible, the DEIR needs to identify the technology proposed by the University and demonstrate its applicability to the flows anticipated by various LRPP elements.

Since no specific information is provided regarding the types of measures to be implemented nor is there any discussion regarding their effectiveness, there is no basis for concluding that residual impacts would be “not significant.”

HYDRO Comment #15. LRDP Mitigation HYD-2A

LRDP Policy ERO-16 states that “Projects shall be designed to minimize soil erosion and, where possible, to direct surface runoff away from coastal waters and wetlands, according to the following policies...”: This LRDP Policy further states that this shall be done to the maximum extent feasible. Based on this policy the University must include additional mitigations to retrofit all existing storm drains and effectively treat all existing runoff, not just areas of new development.

Alternative Mitigation Measure that is Adequate and Feasible

Since the WRCB has recently adopted a “General Permit” for construction sites, the University should commit to adhere to that permit and discuss what additional measures will be implemented to achieve “maximum extent feasible” standard. Mitigation measures to prevent erosion or remove soil during construction include aggressive use of erosion control measures (such as temporary detention basins and soil binders) and installation of permanent detention systems or bioswales; these mitigation measures are considered standards in the construction industry. In order to demonstrate that soil erosion is mitigated to maximum extent feasible, the DEIR needs to identify the technology proposed by the University and demonstrate its applicability to construction site conditions anticipated by various LRPP elements.

Until specific information is provided regarding the types of measures to be implemented and there is discussion of their effectiveness, there is no basis for concluding that residual impacts would be “not significant.”

HYDRO Comment #16. LRDP Mitigation HYD-2A

The proposed 2008 LRDP will increase the amount of impervious surfaces resulting in increased runoff which is a significant impact and needs to be disclosed and mitigated. 

(Page 4.7-29; Water Agency)
Alternative Mitigation Measure that is Adequate and Feasible

To mitigate the impacts resulting from an increase of impervious surfaces the DEIR should include a mitigation requiring the use of permeable pavement in both existing development and new construction and redevelopment to reduce impacts to a less than significant level.

(Page 4.7-29; Water Agency)

HYDRO Comment #17. LRDP Mitigation HYD-2A

The proposed growth in the 2008 LRDP will result in a significant amount of redevelopment of existing areas throughout the campus. This will provide the University with the unique opportunity to retrofit existing drainage facilities to further reduce sedimentation and particulate matter.

Alternative Mitigation Measure that is Adequate and Feasible

This mitigation measure should commit the University to retrofitting existing drainage facilities where any redevelopment occurs, either through improved collection measures or increasing the amount and use of pervious surfaces. This will further implement the University's goals of being a leader in sustainability.

(Page 4.7-30; Water Agency)

HYDRO Comment #18. LRDP Mitigation HYD-2A

Bioswales by themselves do not adequately address the removal of non-biodegradable solids. In order for bioswales to address the removal of solids, the mitigation should be modified as proposed below.

(Page 4.7-30; Water Agency)

Alternative Mitigation Measure that is Adequate and Feasible

Solids removal units (such as the proposed CDS units) need to be installed in tandem with properly sized bioswales to address oil/grease, nutrients and heavy metals.

HYDRO Comment #19. LRDP Impact HYD-3

This impact must discuss the need for hydromodification mitigation ("Low Impact Development") stipulated by the CCRWQCB in their letter of February 15, 2008.

(Page 4.7-31-34; Water Agency)

Alternative Mitigation Measure that is Adequate and Feasible

The LRDP DEIR needs to demonstrate a detention of the first 0.75 inch of precipitation on site.

HYDRO Comment #20. LRDP Mitigation HYD-3A

The CCRWQCB stipulates “effective impermeable area shall be maintained at less than 5% of total project area” in their letter of February 15, 2008; therefore the proposed level of impermeable surface described in the LRDP would be a significant impact since it is inconsistent with a water quality regulation.

(Page 4.7-32-37; Water Agency)
Alternative Mitigation Measure that is Adequate and Feasible

In order to mitigate this significant impact, the design of the proposed facilities must be modified to demonstrate that effective impermeable area will be maintained at less than 5% of total project area.

HYDRO Comment #21. LRDP Mitigation HYD-4

The analysis and technical data provided in the DEIR do not support the significance determination for the volume and velocity of surface runoff. The supporting discussion and sited DEIR LRDP Mitigations do not quantify this determination; therefore, the discussion is inadequate.

(Page 4.7-35 through 36; Water Agency)

Alternative Mitigation Measure that is Adequate and Feasible

The LRDP and DEIR should disclose the existing volume and velocity of surface runoff on campus and where this runoff flows into local water ways. It should also disclose the projected increases in volume and velocity of runoff due to development proposed with the 2008 LRDP. The analysis should consider the impacts to waterways based on the projected increases. The mitigations can only be proposed after this analysis is completed and the known impacts are determined.

HYDRO Comment #22. LRDP Mitigation HYD-4

LRDP Policy ERO-20 is grammatically incorrect and does not make sense. Please correct the policy and reanalyze LRDP Impact HYD-4 in light of the policy’s intended meaning.

(Page 4.7-37; Water Agency)

Additionally, LRDP Policy MAR-4 should apply to all areas of the LRDP to achieve mitigation to the maximum extent feasible. As the DEIR and LRDP are currently written, this policy is only applied to West and North Campuses. However, the provisions of this policy are important to mitigate impacts to water resources across the UCSB property, including Goleta Beach, Goleta Slough, and the Storke Wetlands. LRDP Policy MAR-4 should be rewritten to include all UCSB property as mitigation for impacts identified.

(Page 4.7-37; Water Agency)

HYDRO Comment #23. 4.7.2.4 Cumulative Impacts

This section needs to be based on a rational approach such as a list of reasonably foreseeable projects. Without an explanation of basic approach used, the analysis cannot be considered adequate.

The analysis needs to be based on change on surface characteristics, specifically increased in impermeable surfaces. The LRDP exceeds the CCRWQCB stipulated 5% impermeable surface, therefore an evaluation is needed to determine whether this threshold is exceeded for each affected catchments in a cumulative sense as well.

(Page 4.7-40; Water Agency)

HYDRO Comment #24. 4.7.2.4 Cumulative Impacts

An evaluation of hydromodification is needed based on changes to peak flow and total runoff (remaining within 1% of the original hydrograph) pursuant to the February 15, 2008 letter from CCRWQCB.

(Page 4.7-40; Water Agency)
HYDRO Comment #25.  4.7.2.4 Cumulative Impacts

The SWMPs of the Cities of Goleta and Santa Barbara are, like the UCSB SWMP, not approved. The CCRWQCB, in its letter of February 15, intends to “enroll” (approve) the UCSB SWMP with a number of stipulations including limitations on impermeable surface and retention of runoff. Therefore this section must be corrected.

(Page 4.7-41; Water Agency)
4.8. Land Use and Planning

LU Comment #1. 4.8 Land Use and Planning

The Land Use and Planning section of the DEIR is one of the most important analyses required in the environmental assessment, as it analyzes the impacts the proposed framework and development would have on the existing environment. It should also analyze the impacts and the sufficiency of Land Use Policies and Development standards in mitigating the potential impacts. All development should be identified, categorized by type, shown as a site specific plan, and analyzed for impacts on-site, to adjacent land uses, and on a regional scale. This section of the DEIR fails to adequately disclose or provide the level of analysis necessary to identify and mitigate potential impacts related to the University’s proposed land uses and planning analyses. The DEIR also fails to include monitoring programs to assess land use development as it occurs in order for UCSB and surrounding jurisdictions to accommodate any and all changes to the land use plan in the future. The County asserts that the DEIR should require periodic monitoring reports from the University regarding the impacts and mitigations of 2008 LRDP land use, including, but not limited to:

- changes to land use designations
- changes to gross square footage, populations, or housing units
- levels of services at regional intersections and roadways
- progress and deals to increase alternative transportation projects
- changes to the total AFY water supply needed for the project
- changes to the total surface and wastewater runoff caused by the project
- changes to the availability of recreation areas
- changes to the classification and designation of environmentally-sensitive habitat areas
- other changes that diverge from the DEIR impacts analysis

(Applies to Entire Section; OLRP)

LU Comment #2. 4.8 Land Use and Planning

The DEIR needs to disclose in the discussion the proposed changes in the campus land uses and include a proposed land use map similar to Figure B.6 in the proposed LRDP.

(Applies to Entire Section; OLRP)

LU Comment #3. 4.8 Land Use and Planning

A consistency analysis should be provided to address the implications of the proposed land use changes and proposed overlays to the existing setting. This analysis should disclose the proposed land use changes and their consistency with the Coastal Act, County’s Local Coastal Plan and the existing Goleta Community Plan.

(Applies to Entire Section; OLRP)

LU Comment #4. 4.8 Land Use and Planning

The LRDP proposes moving existing designated ESH areas (ESHA) into an overlay within designated Open Space Land Uses. The California Coastal Act requires that ESHA be clearly defined and the appropriate allowable land uses be identified within the ESHA. The 2008 LRDP and DEIR do not adequately define what constitutes ESHA, nor does it analyze or discuss what uses are allowed.

(Applies to Entire Section; OLRP)
LU Comment #5. 4.8 Land Use and Planning

Figure 4.8-1: This map inadequately represents the lands under the County of Santa Barbara jurisdiction. Isla Vista, Goleta Beach, and portions of the Goleta Slough and areas to the east in the unincorporated Goleta Valley all lie within the County of Santa Barbara jurisdiction and should be considered as such in the analysis of the impacts to these areas in the DEIR.
(Page 4.8-3; OLRP)

LU Comment #6. 4.8.1.2: Existing Development:

As part of the Existing Setting described in this section, the DEIR must disclose the types and locations of existing land uses and structures. Though Figure 4.8-3 discloses the location of existing land uses graphically, there is no discussion in the Land Use Section of the existing housing units/types, academic sq ft, commercial sq ft, or administrative sq ft, This discussion appears only in the Section 3.0 Project Description, The Land Use Section should define the existing baseline and disclose the proposed land use changes in order to analyze the impacts of the proposed changes in the 2008 LRDP.
(Pages 4.8-2-5; OLRP)

LU Comment #7. 4.8.1.2: Existing Development:

Figure 4.8-3: The DEIR discusses the four campuses of UCSB (Main, Storke, West, and North). Detailed maps should be included in this section for each campus to disclose the land use, structures and their types, known habitats, geology, circulation, recreation, and any other detail unique to the individual campus. Without these details, an analysis of campus-specific impact is impossible. Please provide these maps in greater detail.
(Page 4.8-7; OLRP)

LU Comment #8. 4.8.1.3: Adjacent and Surrounding Land Uses

The discussion should disclose the County’s ownership and responsibility over Goleta Beach County Park and the Goleta Slough Ecological Reserve and any benefits that the University may receive from any Goleta Beach long Term Protection Plan.
(Page 4.8-6; OLRP)

LU Comment #9. 4.8.1.3: Adjacent and Surrounding Land Uses

The DEIR should disclose the unincorporated Goleta Planning Area including Isla Vista which is currently subject to the 1993 Goleta Community Plan and supplemented by the IVMP.
(Page 4.8-6; OLRP)

LU Comment #10. 4.8.1.3: Adjacent and Surrounding Land Uses

The DEIR should provide a more comprehensive analysis of adjacent land uses, such as Isla Vista and the City of Goleta. Specifically, the discussion for Isla Vista should summarize the IVMP and its relationship to the proposed 2008 LRDP.
(Page 4.8-8; OLRP)
LU Comment #11. 4.8.1.5: Regulatory Context:

Although the DEIR acknowledges the existing of the 1980 County Comprehensive Plan it fails to acknowledge other relevant planning documents for the area and their relationship to UCSB. Such documents include the County of Santa Barbara Local Coastal Plan, Goleta Community Plan, the 2003-2008 Housing Element, IVMP, the Ellwood-Devereux Plan, City of Goleta General Plan, and City of Santa Barbara Airport Specific Plan. (Page 4.8-12; OLRP)

LU Comment #12. 4.8.1.5: Regulatory Context:

This section should clarify that the unincorporated areas surrounding the University are still governed by the 1993 Goleta Community Plan. The IVMP augments the existing 1993 Goleta Community Plan. (Page 4.8-12; OLRP)

LU Comment #13. Figure 4.8-5: General Plan Land Use Designations:

This map needs to include an additional boundary for the Goleta Community Planning Area. (Page 4.8-13; OLRP)

LU Comment #14. 4.8.1.5: Regulatory Context:

CEQA requires that EIRs identify any inconsistencies with applicable land use plans. The EIR does not adequately identify inconsistencies with the California Coastal Act, e.g. Coastal Access, resource protection, change in intensity of use, etc. The California Coast Act discussion should disclose, with specificity, how the University’s LRDP will comply with the requirements of the Coastal Act in the Land Use Section, as well as in the Project Description. If the analysis is provided in other locations in the DEIR, then please cross reference in this discussion. This analysis is needed to support the conclusions made in the Impacts and Mitigation portion of the Land Use Section. (Page 4.8-16; OLRP)

LU Comment #15. 4.8.1.5: Regulatory Context:

The Goleta Beach Management Plan discussion acknowledges parking problems at Goleta Beach are primarily linked to current campus parking programs which encourage UCSB staff and students to use free parking in Isla Vista and Goleta Beach, which thus impacts the County Open Space resource availability in compliance with the Coastal Act. Please address this issue in the Transportation and Parking Section (4.13). (Page 4.8-17; OLRP)

LU Comment #16. 4.8.2 Impact and Mitigations

Based on the discussion above and comments provided in other sections, the DEIR does not disclose a comprehensive land use analysis for County Land Uses. In addition, the documents sited in the analysis are insufficient in that many applicable policies have not been disclosed.

LRDP Impact LU-1: The Land Use section of the DEIR has not fully analyzed nor has it fully disclosed all applicable land use policies from the County Coastal Land Use Plan and the Goleta Community Plan. Therefore, the identified impact is inadequate since the analysis and disclosures are incomplete. Since many applicable documents have not been included or analyzed correctly the supporting
discussion pertaining to the “less than significant” level is inadequate and misstates applicable policies. Specifically, the adopted 1993 Goleta Community Plan replaced the cited polices of the Comprehensive Plan Land Use Element. In addition, the Standards of Significance have not been addressed in the DEIR. As such, the following Goleta Community Plan goals, policies and action items must be disclosed and analyzed.

(Page 4.8-18; OLRP):

- **Land Use GOAL:** To Provide Housing Affordable To All Goleta Residents, To Strive For A Balance Between Jobs And Housing, To Provide A Range of Commercial And Industrial Uses Which Promote Orderly Economic Development, And To Protect Natural Resources.

- **Action LU-GV-2.1:** The County shall strive to provide a jobs/housing balance by using such planning tools as rezoning and the Goleta Affordable Housing Overlay program.

- **Action LU-GV-3.1:** The County Planning and Development Department shall contact the City of Santa Barbara and U.C.S.B. and request growth projection reports. The County shall perform a responsible agency review on these reports in order to determine any future effects upon the Goleta Planning Area. Should substantial effects be determined the County shall modify the Goleta Community Plan based on any unplanned growth of UCSB and the Santa Barbara airport.

- **Policy G-GV-4:** UCSB and the Airport should fully mitigate their public service and facility impacts.

- **Action G-GV-4.1:** The County shall review UCSB and Airport projects to evaluate public service and facility impacts in light of this Community Plan.

- **Objective GV:** The County shall provide adequate police protection service to the Goleta Planning Area.

**Alternative Mitigation Measure that is Adequate and Feasible**

In light of the discussion above and in consideration of the proposed 2008 LRDP Land Use changes the LRPD is certain to result in impacts on County departments and resources. Therefore, in addition to further analysis the DEIR should include the following mitigation measure:

- **UCSB shall pay the development impact fee (AB 1600) for all applicable impact areas pursuant to the Development Impact Fee (AB-1600) as currently calculated by the County of Santa Barbara to mitigate the impacts of the 2008 LRDP on all public facilities, and as calculated by the County of Santa Barbara at the time of the issuance the Notice of Impending Development (NOID), and**

- **UCSB shall pay the fair share for the ongoing cost for funding impacted public services in the amount identified in the County’s comments on the DEIR for each impact and shall be revised annually by a percentage equal to the adjustment equal to the annual percentage change in the April Consumer Price Index (“CPI – All Urban Consumers) for the Los Angeles-Anaheim-Riverside Region. Adjustments shall be increased up to the nearest five-cent increment. Adjustments shall automatically become effective on the first day of November at which time payment is due each year without amendment.**
LU Comment #17.  4.8.2 Impact and Mitigations

LRDP Impact LU-1: Increasing commercial uses on Ocean Road would directly compete with Isla Vista businesses. Commercial competition has historically resulted in reduced rents for commercial properties in Isla Vista. Low rent commercial districts become blighted over time, resulting in impacts to public services, land use and population, and aesthetics.

The EIR fails to analyze the policy inconsistency between the proposed commercial development on Ocean Rd. and IVMP Interface Action 2.4, which states;

*Interface Action 2.4: The RDA shall encourage UCSB to locate staff/faculty housing on Ocean Road consistent with the intent and nature if diagram on p. 4-74. The RDA shall encourage the inclusion of daycare facilities for children of faculty and staff, as appropriate. The RDA shall discourage student housing and any commercial development within these structures.*

On-campus competition is documented in the 2002 economic study by Strategic Economics and concludes commercial uses at the UCen negatively impacted the commercial viability of downtown Isla Vista. Commercial growth on Ocean Rd. will have an even more significant impact due to its increased proximity to downtown Isla Vista.

*Page 4.8-18; RDA*

**Alternative Mitigation Measure that is Adequate and Feasible**

UCSB shall take the following steps necessary to off-set impacts to the commercial district in Isla Vista from commercial growth on campus:

1) Prohibit food service and restaurant uses on Ocean Road
2) Limit commercial growth on Ocean Road to a maximum of 10,000 sq ft.
3) Limit new on-campus commercial growth within 0.5 miles of Pardall Road to a maximum of 30,000 sq ft

These limits are based on a 5-minute walking radius, which is as far as most people are willing to walk for neighborhood commercial services. The use restrictions were based on the Strategic Economics 2002 study, suggesting the market niche in IV would likely include food service uses.

LU Comment #18.  4.8.2 Impact and Mitigations

LRDP Impact LU-5: The consolidation of ESH into an overlay for the Open Space Land Use designation should disclose the allowable uses within ESHA designation in order to be consistent with the policies of the Coastal Act Sections 30240 and 30502.

*Page 4.8-25; OLRP*

LU Comment #19.  4.8.2 Impact and Mitigations

LRDP Impact LU-6: This impact and supporting discussion does not take into account the proposed height changes and density increases along the Isla Vista community and UCSB Campus border. In addition, the DEIR does not adequately disclose information to make the finding of “less than significant.” The LRDP and DEIR analysis do not acknowledge the potential of all new construction and redevelopment physically isolating the Isla Vista community through the proposed increase in heights and densities along the periphery.

*Page 4.8-26; OLRP*
Alternative Mitigation Measure that is Adequate and Feasible

Please refer to and implement mitigations and comments in DEIR Section 4.1.

**LU Comment #20.  4.8.2 Impact and Mitigations**

LRDP Impact LU-7: The disclosed impact, determination of “less than significant” and supporting discussion are insufficient. As noted above the proposed land use changes have not been fully disclosed or analyzed in the DEIR. The LRDP, as proposed, is inconsistent with many existing goals, policies and action items of various plans applicable to the University and adjacent communities including the Goleta Community Plan and the IVMP. At this point, due to lack of analysis and disclosure, the County cannot propose mitigations to address this impact.

*(Page 4.8-27; OLRP)*

**LU Comment #21.  4.8.3 Coastal Act Consistency**

The proposed LRDP acknowledges the potential needs for seawalls along the east facing bluff of the Main Campus. It provides policies for the potential seawall. This is clearly inconsistent with the Revetments and Breakwaters discussion which is inconsistent with statement in the DEIR Section 4.5 Geology.

*(Page 4.8-30; OLRP)*

Alternative Mitigation Measure that is Adequate and Feasible

Please refer to the comments in Sections 4.5 and 4.7 (Geology and Hydrology and Water Quality) pertaining to bluff setbacks and seawall impacts.
### 4.9. Noise

**Noise Comment #1. Noise 4.9.1.4: Existing Setting:**

Though the LRDP acknowledges that the County Environmental Thresholds and Guidelines Manual identifies 65 dBA as the maximum exterior noise acceptable without mitigation, and that El Colegio Rd operates at a level above the County threshold, it fails to acknowledge efforts underway to widen El Colegio Rd to lessen noise and traffic impacts to more acceptable levels. This project should be described in detail, as it is a cumulative project to consider in the DEIR.  
*(OLRP, page 4.9-6)*

**Noise Comment #2. Noise 4.9.2.2: Analytical Method:**

The DEIR identifies a list of “noise-sensitive uses on campus and adjacent to campus” but fails to measure existing noise levels or predict future noise levels due to the 2008 LRDP from any of these sources in the noise levels measured around campus. The measurements were taken only from existing roads. To fully analyze the impacts of existing and potential noise to sensitive receptor defined in this section, noise levels must be recorded and analyzed for potential increases from all existing sensitive receptors on and off campus, including, but not limited to, the UCSB library, Isla Vista residences along Ocean Rd and El Colegio Rd, all school sites on and adjacent to the UCSB campus, the UCSB Recreation Center and fields, and Cheadle Hall.

Furthermore, the noise level measurements were collected on a Friday, which is a relatively quiet day of the week for UCSB as fewer classes are held, and fewer students, faculty and staff travel to and from the campus. In addition, this measurement occurred on December 1st, 2006 at the end of Fall Quarter near finals when campus activity levels are minimal. It is arguable that when the traffic study was conducted, the locations that were chosen for measurements, combined with the student populations' proximity to finals week, the noise measurements would not have captured peak noise levels, as traffic volumes would have been less significant at the time. Additionally, the one-day study inadequately recorded noise levels for UCSB’s two busiest intersections (Locations 2 and 7 of Table 4.9-3) at relatively quite points of the day (10:00AM and 12:40PM, respectively). This recorded noise level still resulted in the highest levels of any measured intersection (69 dBA). Arguably, had these intersections been measured at 8:00AM and 5:00PM, which are generally standard times of measurement to capture peak hour trips, the dBA measurement would be significantly higher due to higher noise levels from traffic. To capture the reasonable “worst case” scenario baseline noise level, the noise measurement should be re-measured to capture accurate AM and PM peak hour trips. It is important to note that these should also be taken within the first or second month of fall quarter to get an accurate worst case scenario.  
*(OLRP, page 4.9-15)*

**Noise Comment #3. Noise 4.9.2.3: 2007 LRDP Impacts and Mitigation Measures:**

LRDP Impact Noise-1 and its subsequent mitigation (Mitigation Noise-1A) rely on LRDP policy ESH-25 to govern temporary, construction noise impacts. However, this analysis does not consider other 2008 LRDP policies governing noise generation, including ESH-23 and ESH-24. ESH-23 and ESH-24 are policies for noise generation to avoid related impacts to wildlife and biological resources adjacent to construction and operation sites. LRDP Policy ESH-25 conflicts with ESH-23 and ESH-24. ESH-23 and 24 establish construction and operation phase sound level limits at West and North Campus and Coal...
Oil Point (65 and 60 dBA, respectively). However, ESH-25 excuses construction and operational sound level limits campus-wide during 7:00am and 8:00pm and from moving sources, such as tractors, and automobiles, during operational and construction phases. These policies are conflicting.  
(OLRP, page 4.9-21)

**Alternative Mitigation Measure that is Adequate and Feasible**

LRDP Policy ESH-25 should apply only to Main Campus since construction on Main Campus would not likely occur adjacent to ESHA. In addition, the LRDP should include additional noise level restrictions for construction and operation of Storke Campus, as none are proposed in the 2008 LRDP at this juncture.

**Noise Comment #4. Noise 4.9.2.3: 2007 LRDP Impacts and Mitigation Measures:**

LRDP Impact Noise-4 and proposed mitigations 4B and 4C must define specific hours to restrict truck deliveries and special campus events. In addition, the DEIR does not disclose construction methods, such as pile driving, and their potential impacts to sensitive receptors. Without specificity, the mitigation does not guarantee effective restrictions and protection of sensitive receptors from the noise.  
(OLRP, page 4.9-33)

**Alternative Mitigation Measure that is Adequate and Feasible**

The DEIR should provide mitigation measures to guarantee effective noise restrictions, such as hours and protection of sensitive receptors, from the noise in order to support the determination of a less than significant impact as stated in the DEIR.
4.10. Population and Housing

POP Comment #1. 4.10 Population and Housing

The 2008 LRDP proposes a substantial amount of growth in its student, faculty, staff populations, and related academic/support space. As proposed, the student population increase is more than double what was planned for during the 1990 LRDP (5,000 and 2,000, respectively). The 2008 LRDP proposes to accommodate this substantial population growth with proposed development as the University student population grows to 25,000 students from 20,000, which was the population cap established in the 1990 LRDP. However, the DEIR indicates that the student population has already exceeded the student growth proposed in the 1990 LRDP, by 1,410 students (see POP Comment #2). The impacts of this preexisting growth, coupled with the proposed growth toward buildout of the 2008 LRDP must be more thoroughly addressed in this section of the DEIR through analysis and disclosure to clearly identify potential impacts on and off campus.

In general, the terminology used to reference the unincorporated area of the County of Santa Barbara is inconsistent. Please review the document for internal consistency. In addition, the use of standard terminology is needed for clarification. Please see comment #3.

(4.10 General, OLRP)

POP Comment #2. 4.10 Population and Housing

Based on Table A.1 of the 2008 LRDP, the Total Existing Population of UCSB is 24,685. However, the DEIR and the UC Santa Barbara Office of Budget and Planning discloses a much higher existing population as of the 2007-08 school year. Section 3.0: Project Description and the UC Santa Barbara 2007-08 Campus Profile discloses that in the 2007-08 school year, UCSB had:

- 9,723 Faculty and Staff (UCSB Personnel headcount, UC Santa Barbara, “2007-08 Campus Profile”, page 8, http://bap.ucsb.edu/IR/07-08/cp2007.pdf )
- Total Population = 31,133

This discrepancy is a difference of 6,448 people factoring into the existing UCSB population, not including student, staff, and faculty family members.

Similarly, Table A.1 of the 2008 LRDP reports that in 2025 the UCSB population will be 31,431 people. However, in Section 4.11: Public Services, the DEIR discloses that LRDP will actually bring 11,106 additional people due to:

- 5,443 new bedspaces
- 239 net new student family units (@ 2.68 persons per unit)
- 1,874 net new faculty/staff units (@ 2.68 persons per unit)

This means that the true total primary population by 2025 from the 2008 LRDP is 42,239. The difference between these two sums is 10,808 people. Additionally, Section 4.10: Population and Housing (Table 4.10-3) reports that the unincorporated area of Isla Vista houses 40% to 46% of UCSB’s student population. At this rate, in 2025 12,463 of the 27,092 projected student population of UCSB will reside in Isla Vista. The discrepancy between what is reported in the Table A.1 and what is disclosed in the DEIR should be remedied. Furthermore, the DEIR should perform all analyses of
environmental impacts based on the higher potential buildout population, as this would disclose all impacts under a “worst-case scenario” development pattern.

(4.10 General, OLRP)

**POP Comment #3. 4.10.1.1 Study Area**

Hope Ranch is not a city. It is a residential community within the unincorporated Goleta Planning Area of Santa Barbara County. Many students, faculty and staff from UCSB live in the unincorporated Goleta Valley, which lies directly adjacent to the University. Furthermore, the data provided for student and faculty populations should be consistent with the method of measurement from the 1990 LRDP. Data should also be provided that illustrates how the University has or has not complied with the 1990 LRDP.

(Pages 4.10.2-3; OLRP)

**POP Comment #4. Study Area**

A new row including the total number and percent should be added to Table 4.10-3 to fully illustrate the trends in student living locations. This addition would accurately report that approximately 70% of the student population lives off-campus.

(Page 4.10.3; OLRP)

**POP Comment #5. Study Area**

The data provided in Table 4.10-7 is inaccurate and does not comport with Table 4.10-6. The population figures are inaccurate for the City of Santa Barbara. Please update the DEIR data with current and reliable information.

(Pages 4.10.6-7; OLRP)

**POP Comment #6. 4.10.1.6 Regulatory Context, County of Santa Barbara**

The section should be revised to include the following County policies as follows:

- County of Santa Barbara Housing Element (HE) Goals 1-9 should be used, not the HE Implementation Guidelines. (Page 4.10-21; OLRP)
- The County's HE Goal 1.10.4 (Isla Vista Master Plan) should be disclosed. (Page 4.10-21; OLRP)
- The County's Local Coastal Plan housing policies should be disclosed.

(Page 4.10-21; OLRP)

**POP Comment #7. Regulatory Context, County of Santa Barbara**

The Narrative should be updated to reflect that the County Board of Supervisors has adopted the Isla Vista Master Plan (IVMP); an updated policy list and project improvement list with adopted policies should be included. Furthermore, it should be noted that the rezones in the IVMP constituted the implementation of Housing Element Policy 1.10.4.

(Page 4.10-21; OLRP)

**POP Comment #8. 4.10.2.3 Impacts and Mitigation Measures**

The DEIR states that no people or housing will be displaced under the 2008 LRDP. This is inconsistent with the proposed redevelopment of various existing housing developments on campus, such as Storke
and Santa Ynez apartments. Considering the stated 1% student growth per year, this statement is inconsistent with DEIR data and with LRDP Mitigation POP-2.
(Pages 4.10-22 & 25; OLRP)

**Alternative Mitigation Measure that is Adequate and Feasible**

The 2008 LRDP and DEIR should propose a phasing plan for all development. The phasing plan should address the following at issuance of Notice of Impending Development (NOID):

1. Existing student populations
2. Additional students at each phase
3. Number and types of existing housing units
4. Number and types of additional housing units
5. The location and capacity of housing for displaced residents during redevelopment projects

The issuance of any NOID should not result in the displacement of residents into surrounding areas off campus. Furthermore, if at any point, on-campus housing cannot accommodate the proposed growth (student and faculty) then growth should stop until the needed development can accommodate the growth. The proposed 4 year lag in the DEIR is not acceptable as the surrounding areas will be burdened with the anticipated growth during this period.

**POP Comment #9. LRDP Mitigation Measure POP-2**

LRDP Mitigation Measure POP-2 is inadequate as it states that housing opportunities may not keep pace with increases in either enrollment and/or new employees anticipated under the 2008 LRDP. This is identified as a significant impact, and LRDP Mitigation POP-2A proposes to address the impact by assuring that adequate housing will be provided for new populations no later than four years after that populations' arrival. This proposed mitigation is not adequate, as a 4-year lag between LRDP residential development and growth in student and faculty populations presents significant impacts to the surrounding areas that could mitigated with an accurate development phasing plan.

Over any given four-year period in the LRDP, housing for an average of 1,176 students and 450 faculty/staff (annualized growth over four years) is needed. These increases in population will have an impact on the demand for additional housing and services in the unincorporated area by significant levels. Moreover, these impacts have not been adequately quantified in the DEIR, as the unincorporated areas of Goleta and Isla Vista are not disaggregated from the City of Goleta in most discussions. According to the DEIR Table 4.10-3, 40-46% of UCSB students live in Isla Vista (This is inconsistent with Table B.11 in the Draft LRDP which says that 40% of students live in Isla Vista). This means an additional 470-540 students and 20-25 faculty/staff may locate in Isla Vista over this four year period. In fact, this additional population represents a new increment of growth that will not be entirely accommodated until the final LRDP housing projects are constructed, which could be twenty years into the future. This new increment does not account for any increases to the base population of students (70% off-campus) that is likely to occur due to a portion of undergraduate students that may need more than four years to graduate.

This new increment of growth will increase the demand for housing, parking, public safety, and other public services throughout the life of the LRDP. According to the Parking Study in the DEIR, 83% of students living in Isla Vista own vehicles, and most faculty and staff can be assumed to own vehicles. This means that demand for an additional 400-450 parking spaces will be in Isla Vista. Additionally, this new increment of growth will place pressure on existing non-student residents' ability to afford the cost of housing, as lower vacancy rates will drive rents above the current rate of $1,000 - $1,400 per bedroom for student housing in Isla Vista.
This negatively impacts the ability of the County to achieve the Isla Vista Master Plan’s (IVMP) Housing Goal to produce new housing that is affordable to all sectors of Isla Vista, including area workers and families that are not unaffiliated with UCSB. IVMP Housing Policies 2, 4, and 5 are negatively impacted by this unaddressed increment of growth, as overcrowding will expedite dilapidation of the housing stock and large student populations could crowd out long-term residents. This new increment of growth also negatively impacts the County’s Housing Element Policy 1.10.4, under which Isla Vista constitutes an important community for meeting the unincorporated area’s regional housing needs. (Page 4.10-25 & 27; OLRP)

**Alternative Mitigation Measure that is Adequate and Feasible**

The proposed mitigation to the population growth is inadequate, as it does not appropriately address the physical impacts associated with the new increment of growth that will occur and is likely to remain in Isla Vista throughout the life of the LRDP. The most effective way to mitigate these impacts is to ensure that new housing to accommodate growth in student enrollment and faculty/staff is provided prior to the actual presence of these populations. Currently, the mitigation calls for ensuring that accommodations are provided within four years of the presence of each four year increment of growth. The following should be incorporated into LRDP Mitigation POP-2A to ensure that the impact remains less than significant:

- To ensure that sufficient housing accommodations are planned appropriately, the County requires that the LRDP and the DEIR include a phasing plan and development schedule that shows when residential projects will be phased, and demonstrates how this phasing correlates with anticipated UCSB workforce and student growth.

- To ensure that sufficient housing accommodations have been provided, the County requires that all Notices of Impending Development (NOID) demonstrate affordability and suitability of the proposed space. Notices should include all items illuminated in the LRDP, as well as housing types and tenures, proposed rents or sale prices of units, targeted population served by the units, the number of units in a project, and the jurisdiction within which the project is located to ensure that units will be affordable to UCSB workforce and students, and will not induce growth in Isla Vista.

- UCSB is required to provide an annual report summarizing all NOIDs, along with the other information currently recommended in LRDP Mitigation POP-2A to the County and all other jurisdictions by February 1 of each year, so that this information may be included in the Housing Element section of each appropriate jurisdiction’s General Plan Annual Report to the Legislature.

- If sufficient housing capacity has not been demonstrated prior to the arrival of new student and faculty/staff populations, UCSB is required to contribute to an Isla Vista Affordable Housing Trust Fund, as well as to an Isla Vista Parking Fund, that will be used to mitigate the impacts of each increment of growth. The County’s existing per unit affordable housing in-lieu fees and parking related development impact fees will constitute a baseline for the annual contribution.

- The findings supporting whether sufficient housing capacity has been demonstrated will be based on the information provided in the NOIDs and UCSB’s annual report. If a finding has been made by the UCSB Planning Director that sufficient housing capacity has been demonstrated, this finding must be supported by the County Board of Supervisors. Otherwise,
UCSB will contribute to the Isla Vista Affordable Housing Trust Fund and the Isla Vista Parking Fund.

- The items noted above should be incorporated into the 2008 LRDP Notice of Impending Development (NOID) language and associated DEIR mitigations.

**POP Comment #10. LRDP Impact POP-3**

The DEIR inaccurately states that the County has a residential build-out of 8,200 units. This seems to be in reference to the build-out of the South Coast, given on page 4, Appendix 5, of the SBCAG Regional Growth Forecast. The LRDP will create direct and indirect growth that will add to the demand for housing in the County. This will have significant impacts that are capable of being mitigated.

As the DEIR notes, in Table 4.10-5, the annual average rate of growth in population exceeds the rate of growth in housing throughout the County. This fact places pressure on vacancy rates, increases rents and housing costs, and increases competition for affordable housing, particularly for very low and low income households. The proposed LRDP will worsen this situation in several ways.

Most significantly, the LRDP will drive employment growth in other industries through the induced effects of workforce and student spending, as well as capital spending. At least 2,214 new jobs will be created as a result of the implementation of the LRDP (estimated based on new total of 11,071 induced jobs in Section 6.21). The vast majority of these jobs will be in the retail, hospitality, and service sectors, which are some of the lowest paying industries in the County. Based on salary information from the 2006 UCSB Economic Outlook, salaries for the hospitality and retail industries averaged $23,000 per worker, and salaries in the services industry averaged $42,000 per worker. Service and hospitality workers could afford to pay $680 per month for housing, whereas service industry workers could afford to pay $1,180 per month. Clearly, workers that occupy these jobs will place increased demand on the County’s stock of rental housing. Those who are unable to find housing will be forced to commute from outside of the area, thereby impacting the roadway system and contributing to traffic congestion, air quality and greenhouse gas emissions.

Additionally, some portion of the UC workforce is likely to remain on the South Coast through retirement, adding to the demand for housing that is created by existing and new members of the UC workforce. Even though newly hired staff would be provided with housing through the projects in the 2008 LRDP, some portion of this workforce is likely to retire within the next 17 years, and remain on the South Coast. Upon retirement, these one-time members of the UCSB workforce that were provided housing by UCSB would enter the local housing market, representing an additional increase in demand for housing. While these impacts are significant, they are also avoidable, as the measures described below could provide appropriate mitigation.

*(Pages 4.10.27 & 29; OLRP)*

**Alternative Mitigation Measure that is Adequate and Feasible**

LRDP Mitigation POP-3A should be modified to ensure that the resulting impact is mitigated to a less than significant level. The modification below should accomplish this.

- House 100% of the current and future UC workforce and student population on the UCSB campus, so as to relieve direct and induced pressure on the County’s housing stock. This will reduce demand for housing and enable the 2,214 new workers that occupy jobs induced by UCSB, along with UCSB retirees, to find housing.
• If UCSB cannot attain this mitigation then the University should pay the County in lieu fees to offset the costs of providing affordable housing for the 2,214 workers that occupy jobs induced by the UC.
4.11. Public Services

PUB Comment #1.

In general, the DEIR is inadequate in its discussion of project-specific impacts to public services. By increasing student, faculty and staffing levels and by the indirect growth inducing impacts, the project will clearly cause population growth. Due to current inadequacies in the provision of public services, such as fire and law enforcement, by UCSB to serve the existing population, as documented below, this proposed population growth will result in increased crime, growth inducing impacts, and the foreseeable blight and physical deterioration of private and public facilities. CEQA requires that such public service and blight related impacts be analyzed in depth and mitigated. The DEIR has not successfully mitigated the impacts of the 2008 LRDP to public services.

It is clear to the County that past service agreements with the University to mitigate impacts to public services have not been fulfilled by UCSB. For example, the Isla Vista Foot Patrol is presumably staffed under the original agreement of 50% County/50% UCSB staffing of field sworn deputies. The Foot Patrol is currently staffed with 28.25 sworn full-time employment (FTE) officers. However, the 50/50 agreement has not been upheld. Currently, the Santa Barbara County Sheriff’s Dept (SBCSD) staffs the foot patrol with 14 uniformed sworn staff, while the University staffs the Foot Patrol with 7 uniformed sworn staff.

Under the 2008 LRDP, the County anticipates complete cooperation in mitigating impacts on public services with monetary compensation for the on-going operation of service agreements between the University and the County, including the Sheriff and Fire Departments. Adherence to these pending service agreements will become especially crucial as implementation of the 2008 LRDP proceeds with significant impacts to traffic and, as a result, increased response times to emergencies in Isla Vista and surrounding areas.

PUB Comment #2. 4.11.1.2 Law Enforcement

Section 4.10: Population and Housing (Table 4.10-3) reports that the unincorporated area of Isla Vista houses 40% to 46% of UCSB’s student population. At this rate, in 2025 12,463 of the 27,092 projected student population of UCSB will reside in Isla Vista. The population growth proposed by the LRDP will significantly increase the student population of Isla Vista as continuing students are required to move off campus. The Law Enforcement Discussion should disclose accurate information pertaining to the future student population in Isla Vista and existing mutual service agreements that exist between law enforcement agencies and UCSB. Without this information, the DEIR will not adequately identify impacts nor will it propose adequate mitigation for the negative impacts to law enforcement service levels resulting from the 2008 LRDP.

(Pages 4.11-1-5; OLRP)

PUB Comment #3. University Police Department

The DEIR acknowledges two annual events which require extraordinary law enforcement and patrolling, namely Halloween weekend and the Fall Orientation Period. These are two typically reoccurring events that require a significant increase in staffing for the UCSB Campus and surrounding areas, especially in Isla Vista. It should be noted that the description of “Orientation Weekend” in the DEIR is inaccurate. The implemented County program to address “Orientation Weekend” is actually...
called the “Fall Orientation Program”. The ‘Fall Orientation Program” is not focused on a single weekend or even month, but a significant reoccuring weekend event that occurs from the beginning of the University’s fall quarter in September through the Halloween weekend at the end of October. The significant impact to law enforcement occurs when new students (for most, their first time away from home) partake in large party and unruly behavior, which results in increased demand for the SBCSD. The DEIR should acknowledge this significant impact to law enforcement service levels during Fall Quarter of UCSB school year. Without this information, the DEIR is inadequate.

(Pages 4.11-1-2; Sheriffs Department)

PUB Comment #4. University Police Department

The University of California Police Department (UCPD) provides police services for all campus properties and coordinates with the California Highway Patrol and County of Santa Barbara Sheriff’s Department. However, the actual service capabilities of the UCPD have not been disclosed. Please discuss equipment, staffing, training, and response abilities in this section to ensure the DEIR fully discloses all impacts to these public services.

(Pages 4.11-1; OLRP)

PUB Comment #5. Isla Vista Foot Patrol (IVFP)

Isla Vista (IV) is the most active area in the Sheriff’s jurisdiction, including its four contracted cities. Isla Vista leads in Calls for Service, Reports and Part 1 Crimes. As such, during peak activity events, such as the Fall Orientation Program and Halloween Weekend, law enforcement services are often deployed in Isla Vista to the detriment of service levels in other areas of the SBCSD service district. This diversion of services to Isla Vista from other areas depletes response times and law enforcement capabilities in other areas of the County. The DEIR should analyze the impacts of increased population in Isla Vista on regional law enforcement response times and service capabilities, as any increase in population will inevitably cause the peak activity events in Isla Vista to require increased service from the SBCSD away from other areas, such as the City of Goleta.

Additionally, due to the high volume and nature of activities, IV has the highest staffing level of any jurisdiction in the County. The Isla Vista Foot Patrol is staffed at a ratio of 1.86 sworn per 1,000 residents. Additional deputies stationed 24 hours, 7 days a week, usually on overtime, augment staffing during peak activity events since UCPD is not currently providing its fair share of the staffing responsibility. The average staffing level in the unincorporated area is 1.3 sworn per 1,000 persons. The cities of Santa Maria, Santa Barbara and Lompoc average 1.34 sworn per 1,000 persons. IV has a population of 15,562 and is typically subject to transient populations during the year. UCSB students visit IV to socialize, shop, study, and recreate, which contributes to the actual service population significantly. This statistical data should be included in this section of the DEIR to ensure the existing setting is fully disclosed and that all impacts to this existing setting are mitigated.

(Pages 4.11-1-2; Sheriffs Department)

PUB Comment #6. Isla Vista Foot Patrol(IVFP)

Staffing levels for the IVFP were not modified in the prior LRDP and are currently inadequate. When the IVFP was created over 30 years ago, it was staffed in a 50/50 partnership with UCPD. Each agency contributed a supervisor and five officers for a total of 12 sworn. The IVFP began as a day shift operation and was policed by Goleta Valley units during the late night hours. It is now a full 7x24 operation with 21.25 sworn Santa Barbara Sheriff’s Office deputies and 7 University sworn UCPD officers. The increased staffing levels are attributable to the County. Additionally, long-term and short-term vacancies on campus are routinely filled by IVFP officers from the UCPD. Since the UCPD’s
primary responsibility is the campus, officers are pulled from the IVFP to cover campus shortages. These vacancies at the IVFP are filled via overtime at the expense of the County. In this scenario, the SBCSD must divert frontline law enforcement resources from other geographic locations within the unincorporated area.

The Isla Vista Foot Patrol is staffed with 7 UCPD officers, but it is clear that growth-inducing impacts of the 2008 LRDP will require an increase in the staffing needs of the IVFP. This increase will become necessary to maintain law enforcement at effective and acceptable levels. This discussion should further clarify how UCSB Campus contributes to staffing commitment to providing adequate law enforcement to the impacted community of Isla Vista. The DEIR references the Isla Vista Foot Patrol Station as the UCSB Police Sub-Station. Although the station may be located on UCSB property, the document should clearly disclose the Santa Barbara Sheriff’s Office as the operator of the sub-station.

(Pages 4.11-1-2; Sheriffs Department)

**PUB Comment #7. Santa Barbara County Sheriff’s Department**

This discussion should disclose current crime statistics for the Santa Barbara County Sheriff’s Department (SBCSD) for Isla Vista and, as noted above, disclose additional information pertaining to staffing levels of the IVFP. The County Sheriff’s Department statistics will disclose important information pertaining to the existing setting and the proposed growth in the LRDP. The statistics should provide clarification for the volume of alcohol related crimes and crimes against persons, as they are closely related. Additionally, crime statistics for the Isla Vista area should be listed along with the University Crime Statistics to fully disclose the scope and impacts of the proposed project.

(Pages 4.11-2; Sheriffs Department)

**PUB Comment #8. Isla Vista Foot Patrol (IVFP)**

Though the minimum service-to-population standards noted in the DEIR are consistent with the policies of the Goleta Community Plan, the DEIR does not consider the increased service-to-population ratio required by conditions in Isla Vista. The DEIR acknowledges the SBCSD preferred ratio of 1 officer per 1,000 persons, but does not identify the source of this information. As previously described, the County staffs the IVFP at a 1.8 officers per 1,000 person ratio. This information should be disclosed in this section to establish an accurate setting for law enforcement in IV.

Furthermore, the DEIR should disclose the functionality of law enforcement response to UCSB owned properties in the Isla Vista Community. Due to the close proximity of SBCSD to UCSB, the SBCSD often responds to calls for incidents occurring at these UC-owned properties, including Santa Catalina, Tropicana and Fountain Blue Apartments, IV Theater, and Embarcadero Hall, even though these properties should be the full responsibility of the UCPD. These properties can be described as islands in the SBCSD’s service are without connectivity to the UCPD facilities. This scenario augments the need of officers for the total population of Isla Vista.

(Pages 4.11-2; Sheriffs Department)

**PUB Comment #9. Isla Vista Foot Patrol (IVFP)**

Parking is a concern for the County under the 2008 LRDP as proposed. Parking in Isla Vista is already a dilemma both functionally and for enforcement officers. The addition of 6,736 new staff, faculty and students using only 3,650 new spaces will further exacerbate the poor parking conditions in Isla Vista, as UCSB requires the payment of parking fees and students/faculty/staff routinely avoid parking fees by parking in IV or at Goleta Beach County Park. Additionally, many of the new developments proposed would utilize on-street parking. The Santa Catalina redevelopment project, for example, is
proposed to add 600 beds and no additional parking. The surrounding streets are already used by Santa Catalina residents for parking and any increase in cars will have significant impacts on area parking without increased regulation and enforcement. An increase in demand for parking availability in and around the UCSB campus as a result of the 2008 LRDP should be met with increased parking regulations and enforcement by local law enforcement.

(Public Comment #10. 4.11.2.3 Impact PUB-2)

LRDP Impact PUB-2 recognizes that the proposed population growth will result in an increase in demand on the SBCSD. However, the DEIR has determined that the significance of this impact is less than significant and no mitigation is required. The justification for this determination is insufficient. This DEIR section has not established a quantifiable baseline condition, nor has it recognized that UCSB students represent nearly half the population of Isla Vista, which require County resources for annual events such as the “Fall Orientation Program” and Halloween, which both occur during the first quarter of the school year. The DEIR does not establish the existing and future demand on the SBCSD and related administrative services, such as parking enforcement, District Attorney, public defenders and courts systems.

(Alternative Mitigation Measure that is Adequate and Feasible)

The SBCSD proposes the following mitigation measures to ensure that adequate Law Enforcement is available for the surrounding area at all times.

The University should contribute funding to reach the 50/50 uniformed sworn staffing level with the County for the Isla Vista Foot Patrol while maintaining the existing service to population ratio of 1.86 officers to every 1,000 people. Per this condition, the University should enter into a Memorandum of Understanding (MOU) with the County to meet existing deficiencies in IVFP staffing and arrange for increases in staffing proportional to the phased growth proposed by the 2008 LRDP. Clearly defined levels of service should be defined to ensure blight, urban decay, and all associated environmental impacts are mitigated. Additionally, this MOU should alleviate the UCPD practices of holding long term vacancies at the Foot Patrol and assigning personnel that are scheduled for long term leaves, both without monetary or staffing backfill, as these practices require the County to remove services from other areas in the County to cover the resulting staffing deficiencies.

In addition to the above remedies for current issues, the following measures funded by the University are necessary to mitigate the impacts to law enforcement of the proposed University expansions:

1) Add (1) one Parking Enforcement Officer- With the parking to population ratio proposed, the future parking impacts are presumed to be severe.
2) Add (1) one clerical support/reception staff member- The IVFP has evolved into a 7x24 operation. Seven day and evening per week support staff coverage is necessary with the increased hours and activity.
3) Add (11) eleven sworn Deputy Sheriffs- The increase of almost 11,106 new students, staff and faculty, and family members will add significant workload for the IVFP. Although many of this population increase will live on University property, much of their time will be spent in Isla Vista. It is expected that individuals will frequent IV for classes, socializing, shopping, dining, recreating and partying. The eleven additional positions are based upon the current sworn staffing ratio for Isla Vista of 1.86 sworn per 1,000 of population.
PUB Comment #11.4.11.2.3 Impact PUB-2

As noted above the proposed growth and resulting impacts on Law Enforcement are significant. Additionally, the DEIR discussion does not document the additional specialized and technical services that the SBCSD provides that exceed the service capabilities of the UCPD., such as:

- Forensic and criminal investigations
- Bomb Squad
- large demonstrations at campus or in Isla Vista organized by UCSB students, or

The increases in staffing needed to mitigate these impacts of the 2008 LRDP would require significant increases in capital improvements, including equipment, new construction, and law enforcement vehicles, to outfit new deputies with adequate facilities.

*(Page 4.11-16; Sheriffs Department)*

Alternative Mitigation Measure that is Adequate and Feasible

In order to mitigate these impacts to a less than significant level, the following new mitigation measure should be included:

1) UCSB shall pay the County of Santa Barbara development impact fee\(^5\) (AB 1600) for Law Enforcement Facilities pursuant to the Development Impact Fee (AB-1600) as currently calculated by the County of Santa Barbara to mitigate the impacts of the 2008 LRDP on Law Enforcement facilities and as calculated by the County of Santa Barbara at the time of the issuance the Notice of Impending Development (NOID) and

2) UCSB shall pay the fair share for the ongoing cost for funding this public service in the amount of $8,066,100 which shall be revised annually by a percentage equal to the adjustment equal to the annual percentage change in the April Consumer Price Index ("CPI – All Urban Consumers") for the Los Angeles-Anaheim-Riverside Region. Adjustments shall be increased up to the nearest five-cent increment. Adjustments shall automatically become effective on the first day of November at which time payment is due each year without amendment. The payment of UCSB’s fair share of ongoing costs may be offset by direct revenues specifically generated by UCSB and its related population in Isla Vista as described in Attachment B.

PUB Comment #12.4.11.2.3 Impact PUB-2

This discussion defers the noted and anticipated impacts resulting from the proposed LRDP growth on mitigation measures from the previous 1990 LRDP, which is incorrect as stated above. The new sub-station may not mitigate the noted impacts since the DEIR does not include any supporting data nor does establish the staffing of the new sub-station.

*(Page 4.11-16; Sheriffs Department)*

PUB Comment #13.4.11.1.3 Fire Protection

This discussion discloses only the basic levels of service information pertaining to fire protection for the County and UCSB. The County of Santa Barbara currently provides fire protection services for UCSB, Isla Vista and the City of Goleta. Full analysis of the current demand for Fire Protection Service for UCSB and growth related impacts resulting from the LRDP must be provided in order to fully disclose the extent of potential impacts. To assist with this analysis, the DEIR should disclose call data for UCSB and Isla Vista. Additional services or other functions provided to UCSB by the County Fire
Department, such as those regulated by the County Fire Department as the Certified Unified Program Agency (CUPA), should be accounted for in the DEIR analysis.

*Page 4.11-16, Fire*

**PUB Comment #14. 4.11.2.3 Impact PUB-3**

The DEIR acknowledges the following impact “On-campus development and an increase of on campus population under the 2008 LRDP has the potential to result in environmental impacts associated with expansion to meet an increased demand on the Santa Barbara County Fire Department services and facilities.” In addition, the impact and mitigation discussion states that the resulting population will be twice as much as the existing station can serve. The DEIR does not contain support for its conclusions that impacts to county fire department services will be less than significant. In fact, impacts to fire services that are not addressed in the DEIR include:

- increased public safety risks due to understaffed fire stations,
- increased response times due to increased traffic congestion and population growth,
- increased public safety risks due to staff shortages for hazardous waste regulation,
- increased inspections and enforcement of new and redeveloped structures and for hazardous waste regulation,
- Increased needs for multiple engines and equipment for specialized response emergencies,
- Increased need for fire and forensic investigation services,
- increased safety risks to firefighters due to inadequate staffing levels, and
- potential blight due to degradation of facilities and homes due to lack of adequate regulatory and public safety services.

The LRDP Impact PUB-3 should be corrected to state the following:

“Implementation of the 2008 LRDP will result in environmental impacts associated with on-campus development and ancillary increases in off-campus population that will significantly increase demand on the Santa Barbara County Fire Department services and facilities.”

The Santa Barbara County Fire Department strongly objects to the following statement in the support mitigation discussion (Page 4.11-18, first paragraph, 6th & 7th sentence): "The University does not have control over how and when the County Fire Department chooses to respond to this impact. Thus, the University's direct impacts to fire would be significant and unavoidable." Since the impacts to ongoing fire services will be significant, UCSB is obligated to mitigate the impacts by funding increased service levels and constructing needed facilities and improvements.

*Page 4.11-16, Fire*

**Alternative Mitigation Measure that is Adequate and Feasible**

The DEIR language should be changed to state the following: "The University is responsible for providing fire services to campus owned properties. In order to mitigate the increased need for firefighters and fire station facilities due to the growth proposed in the 2008 LRDP, the University shall pay for the necessary firefighting staff needed to adequately protect the health and safety of its faculty and student populations, as well as to construct new fire stations necessary to serve this new population and infrastructure. At full LRDP buildout, this would require 9 post positions be staffed (27 firefighters) and the construction of two new fire stations: one rebuilt fire station to serve the existing main (east) campus and one new fire station to serve the West Campus area."
1) The rebuilt fire station to serve the main (east) campus area is necessary in order to bring the existing fire station up to Essential Facility Act Standards as well as to accommodate the necessary increase in firefighting personnel assigned to it.

2) A new fire station on West Campus should be constructed in the general vicinity of El Colegio Road and Storke Road on UCSB property to best serve the West Campus area.

The timing for funding firefighter positions shall be seven (7) post positions (21 firefighters) at the beginning of the 2008 LRDP implementation. The 8th and 9th positions will be phased with campus growth over the life of the 2008 LRDP. When future enrollment increases reach an additional 2,500 students over existing enrollment, the 8th post position (3 firefighters) shall be added by UCSB. When future enrollment increases reach an additional 5,000 students over existing enrollment, the 9th post position (3 firefighters) shall be added by UCSB. By implementing and monitoring these mitigation measures, the University's direct impacts to the County Fire Department would be mitigated to a less than significant level.

Alternative Mitigation Measure that is Adequate and Feasible

In order to mitigate these impacts to Fire Services, the following mitigation measure(s) should be included in the DEIR:

1) UCSB shall pay the County of Santa Barbara development impact fee4 (AB 1600) for Fire Protection pursuant to the Development Impact Fee (AB-1600) as currently calculated by the County of Santa Barbara to mitigate the impacts of the 2008 LRDP on fire protection facilities and as calculated by the County of Santa Barbara at the time of the issuance the Notice of Impending Development (NOID) and

2) UCSB shall pay the fair share for the ongoing cost for funding this public service in the amount of $5,165,000 which shall be revised annually by a percentage equal to the adjustment equal to the annual percentage change in the April Consumer Price Index (“CPI – All Urban Consumers) for the Los Angeles-Anaheim-Riverside Region. Adjustments shall be increased up to the nearest five-cent increment. Adjustments shall automatically become effective on the first day of November at which time payment is due each year without amendment. The payment of UCSB’s fair share of ongoing costs may be offset by direct revenues specifically generated by UCSB and its related population in Isla Vista as described in Attachment B.

a) UCSB shall enhance the existing Building #574 (commonly known as fire station 17) through full reconstruction to accommodate 9 firefighters on duty each day. If this reconstruction is infeasible for the University, UCSB shall pay the development impact fee to cover the costs of all construction phases and operational equipment of the Station 17 reconstruction. This facility shall meet the Essential Facility Act Standards for building construction. This is necessary in order to comply with California Health and Safety Code 16000 and to provide for the additional staffing needed to adequately serve the fire protection needs of the University.

b) UCSB shall construct a new fire station to serve the proposed West Campus expansion. If this new construction is infeasible for the University, UCSB shall pay development impact fees to the County of Santa Barbara to cover the costs of all construction phases and operational equipment of the new station. This facility shall meet the “Essential Facility Act” (CA Health & Safety Code 16000) standards for building construction. This fire station shall be located on University owned property and be located in the vicinity of El Colegio Road and Storke Road.
c) The University shall pay for the on-going cost of necessary firefighting staff at a minimum service-to-population ratio of 1 firefighter to every 3,000 persons to adequately protect the health and safety of its faculty and student populations at buildout of the 2008 LRDP.

PUB Comment #15.4.11.2.4 Impact PUB-6

The Cumulative Impacts Analysis does not account for the impacts resulting from regional growth on Santa Barbara County Public Administration or countywide services. Projected increases in population associated with the LRDP will result in increased costs to the County providing countywide services associated with law and criminal justice services (courts, district attorney and public defender), public safety (fire, probation and sheriff), health and public assistance services (alcohol, drug and mental health services, public health, social services and child support services), community resources (agricultural commissioner, housing and community development, parks, planning and development and public works) and other governance functions (Board of Supervisors, County Executive Office, Counsel, Auditor-Controller, Clerk-Recorder-Assessor, General Services, Human Resources and Treasure-Tax Collector).

Alternative Mitigation Measure that is Adequate and Feasible

1) UCSB shall pay the County of Santa Barbara development impact fee\(^5\) (AB 1600) for Public Administration, Libraries, and other County departments\(^6\) pursuant to the Development Impact Fee (AB-1600) as currently calculated by the County of Santa Barbara to mitigate the impacts of the 2008 LRDP on public administration facilities and as calculated by the County of Santa Barbara at the time of the issuance the Notice of Impending Development (NOID) and

2) UCSB shall pay the fair share for the ongoing cost for funding these public services in the amount of $4,040,900\(^7\) and shall be revised annually by a percentage equal to the adjustment equal to the annual percentage change in the April Consumer Price Index ("CPI – All Urban Consumers") for the Los Angeles-Anaheim-Riverside Region. Adjustments shall be increased up to the nearest five-cent increment. Adjustments shall automatically become effective on the first day of November at which time payment is due each year without amendment. The payment of UCSB’s fair share of ongoing costs may be offset by direct revenues specifically generated by UCSB and its related population in Isla Vista as described in Attachment B.
4.12. Recreation

REC Comment #1. 4.12.1.1 Study Area

The DEIR states that the University provides for recreation and access to the coast to populations and visitors not affiliated with the University. It should be clearly stated that this recreation use is only available for a fee. Fees are required for facility use and parking for all visitors arriving by motor vehicle.

REC Comment #2. 4.12.1.1 Study Area

The DEIR states that "The majority of LRDP-related impacts are expected to occur on campus, since students, staff and faculty are most likely to use these resources on a regular basis." This statement is incorrect when considering that currently 70% of UCSB student population lives off campus. As such, regional recreation areas, including trails, parks, beaches, are frequently used by UCSB students. These regional recreation areas include the Santa Ynez Mountains and Foothills with such popular destinations as “Three Pools Seven Falls” near the County’s Mission Canyon Planning Area, and “Lizard’s Mouth” near the boundary of the Goleta Planning Area on West Camino Cielo, in addition to County Parks, including Goleta and Isla Vista Beach Parks. Use of these recreation areas requires park maintenance, road maintenance, and remote emergency response in many cases.

The 2008 LRDP states that it will accommodate the proposed growth; however, it does not account for deficiencies or impacts to the non-campus recreation facilities. The DEIR should assess the impacts to parks, trails, transportation, and public services resulting from UCSB population traveling to and from regional recreation destinations. This discussion needs to recognize and disclose what the percentage will be of on-campus and off-campus residents at the adoption of the 2008 LRDP (also refer to Population and Housing Comments).

REC Comment #3. 4.12.1.1 Study Area

LRDP Table B.1 reports that 77 acres of UCSB property were dedicated to recreation in 2007. In 2007-08, 31,133 faculty, staff, and students had access to 0.0025 acres of designated recreation space each. Table D.1 reports that designated recreation space will increase by four (4) acres for a total of 81 acres at buildout of the 2008 LRDP for an additional 6,763 people, not including additional family members. This is only a 5% increase in recreation area for a 22% increase in primary population. This is a concern for the County since the lack of sufficient recreation area for campus populations will displace users to County parks and recreation areas regionally. Additionally, this nominal increase in recreation space, proportional to primary population growth, conflicts with the goals and policies of the Coast Act, which requires sufficient recreation access in the coastal zone. The DEIR should analyze whether the proposed 5% increase in recreation area will suffice for the proposed primary and secondary UCSB populations, whether the proposed 5% increase is consistent with the Coastal Act, and whether additional recreation space should be designated. The County suggests that excess academic/instructional/support space be reassigned as recreation space to avoid potential unplanned population increases (see DESC. Comment #5 from the County for details of this issue).
REC Comment #4. 4.12.1.1 Study Area

The Vicinity Beaches Map (Figure 4.12-3) is missing two (2) coastal access points in Isla Vista (Escondido Pass between numbers 5 & 6 and El Embarcadero between 7 & 8). This map should clearly differentiate coastal access points managed by UCSB versus those managed by County of Santa Barbara.

(4.12-11; Parks)

REC Comment #5. 4.12.1.4 Regulatory Context

The DEIR incorrectly reports that “the pertinent community plan for the project and study areas is the Isla Vista Master Plan. Isla Vista is a sub-area of the unincorporated Goleta Valley, which as a whole is subject to the policies of the Goleta Community Plan. Though the Isla Vista Master Plan provides some unique policies and goals for the Isla Vista Community, it is not a comprehensive planning document and, as such, relies on the Goleta Community Plan for a policy foundation. This discussion needs to disclose the County of Santa Barbara’s recreation policies from the Goleta Community Plan and the Isla Vista Master Plan, as follows. Disclosure of these policies is important due to the large amount of UCSB student population living off-campus as noted in the DEIR.

- Policy PRT-GV-1: Diverse outdoor and indoor recreational opportunities shall be encouraged to enhance Goleta’s recreational resources and to ensure that current and future recreational needs of residents are met.

- Policy PRT-GV-2A: The County Parks Department and other agencies or groups pursuing implementation of the trail system shall use the Goleta Trails Implementation Study and its trail siting and design guidelines to guide future trail development and implementation.

- Policy PRT-GV-2D: Priority for future trail acquisition and implementation shall include, but not be limited to, the following trail categories expressed in descending order of priority:
  
  o Category 1: Fremont\Slippery Rock Trail
  o Category 2: Urban Trails not likely to be acquired through the discretionary permit process
  o Category 3: San Marcos Pass Trail
  o Category 4: Farren Trail

- Policy PRT-GV-5: The County shall actively pursue acquisition of interconnecting useable public trails within designated trail corridors through negotiation with property owners for purchase; through exchange for surplus County property as available; or through acceptance of gifts and other voluntary dedications of easements

- Policy PRT-GV-7: In developing and maintaining the trail system, provision shall be made for the following:
  
  o appropriate trail signage at all major trail heads and signs or markers on public recreational trails;
  o the maintenance of the trail system in Goleta;
  o adequate trailhead parking;
  o consideration should be given to the use of Old San Marcos Pass Road for trail heads; and
• Minimization of erosion on trails, particularly those located near creeks and riparian corridors.

• Policy PRT-GV-13: Properties with the potential for maximum community use shall be considered a high priority in park acquisition decisions. This includes parcels which are highly visible (e.g., open space lot on heavily used traffic corridor) or are accessible to many people (e.g., park along bike path or at trailhead), or serve people in ways beyond accessibility (e.g., parcel which supports a produce stand).

• Action PRT-GV-13.1: The County shall explore the feasibility of entering into Joint Use Agreements with schools for public use of school recreation facilities when school is not in session.

• Policy PRT-GV-14: Acquisition of open space and passive recreational opportunities shall be based upon the following factors (not listed in order of importance):
  o parcels with good passive recreational opportunities;
  o parcels with good visual qualities;
  o parcels with significant natural resources;
  o parcels with significant physical constraints; and
  o parcels which provide opportunities for public beach access

• Policy PRT-GV-15: There shall be no motorized off-road recreational vehicle sites within the Goleta Planning Area.
  
  (4.12-19; Parks, OLRP)

REC Comment #6. 4.12.2.3 Impacts and Mitigation Measures

As noted above and as indicated in the Housing and Population section of the DEIR, a significant amount of UCSB students and faculty live off campus. The DEIR does not propose a phasing plan to ensure that adequate housing will be provided before enrollment is increased. Furthermore, the DEIR indicates that the University has exceeded the student population cap of the 1990 LRDP. The resulting disconnect between allowed student population and available housing will impact adjacent County recreation facilities. LRDP Impact REC-1 should recognize the proposed redevelopment and potential displacement or unavailability of housing during the life of the proposed LRDP. The DEIR includes a Mitigation Measure REC-2A to tie recreational facilities development with housing development. If the DEIR does not disclose the potential for redevelopment, coupled with an increase in student population without a phasing plan, the LRDP may significantly impact existing on-campus recreational facilities.

(Page 4.12-24; OLRP)

Alternative Mitigation Measure that is Adequate and Feasible

The 2008 LRDP and DEIR should propose a phasing plan, as noted in Section 4.10, for all development related to the proposed LRDP. The phasing plan should acknowledge student populations and availability of on campus housing and other facilities. Furthermore, if at any point, on-campus housing and facilities cannot accommodate the proposed growth (student and faculty) then growth should stop until the needed development can accommodate the growth. The proposed 4 year lag in the DEIR is not adequate as it will cause a significant impact to the surrounding area.
REC Comment #7. 4.12.2: Impact and Mitigation Measures

The supporting discussion for LRDP Impact REC-1 includes a 3rd bullet that references a small bathroom at the West Campus Bluffs area. The DEIR has not considered the construction and resulting impacts of the bathroom in its analysis. If the impacts have not been disclosed, then the proposed bathroom cannot be a mitigation measure. This impact, mitigation and supporting discussion needs to be clarified.
(Page 4.12-25; RDA)

Alternative Mitigation Measure that is Adequate and Feasible

The DEIR should include the appropriate mitigations to address impacts resulting from the proposed bathroom at the West Campus Bluffs area. The bathroom should be designed and constructed to be have no or little impact on the visual, functional, and environmental integrity of the West Campus Bluff area.

REC Comment #8. 4.12.2: Impact and Mitigation Measures

LRDP Impact REC-2 should include in the supporting discussion the amount of UCSB population living off campus. As noted in the DEIR, UCSB students represent approximately 40% of the population of Isla Vista. This population has an impact on the surrounding parkland adding to the physical deterioration of its facilities such as the ongoing use of Goleta Beach by UCSB students for parking and recreation, which add to its deterioration. The DEIR determined that this is a significant impact; however the proposed mitigation does not fully mitigate this to a less than significant level as noted in the DEIR. The following additional mitigations should be included to further reduce these impacts.

Alternative Mitigation Measure that is Adequate and Feasible

LRDP Mitigation REC-2B – This mitigation needs to address public coastal access. The mitigation states that it will maintain a list of facilities. This mitigation needs to address coastal access and public parking throughout the UCSB Campus. It is important to note that the community of Isla Vista is greatly impacted by the UCSB student population and free on-street parking. UCSB should provide designated areas of free parking for beach access as part of the LRDP to improve coastal accessibility.

Alternative Mitigation Measure that is Adequate and Feasible

LRDP Mitigation REC-2C - This mitigation is inadequate in that the proposed LRDP and DEIR do not specify the location or size of the proposed mitigation. If locations and sizes of the proposed mitigation measure are not provided and analyzed in the DEIR, then the following mitigation measure should be used in its place:

1) UCSB shall pay the County of Santa Barbara development impact fee\(^8\) (AB 1600) for parks pursuant to the Development Impact Fee (AB-1600) as currently calculated by the County of Santa Barbara to mitigate the impacts of the 2008 LRDP on park facilities, and as calculated by the County of Santa Barbara at the time of the issuance the Notice of Impending Development (NOID) and

2) UCSB shall pay the fair share for the ongoing cost for funding this public service in the amount of $310,500 which shall be revised annually by a percentage equal to the adjustment equal to the annual percentage change in the April Consumer Price Index ("CPI – All Urban Consumers") for the Los Angeles-Anaheim-Riverside Region. Adjustments shall be increased up to the nearest five-cent increment. Adjustments shall automatically become effective on
the first day of November at which time payment is due each year without amendment. The payment of UCSB’s fair share of ongoing costs may be offset by direct revenues specifically generated by UCSB and its related population in Isla Vista as described in Attachment B.

REC Comment #9. 4.12.2: Impact and Mitigation Measures

LRDP Mitigation REC-3A - See comments for Mitigation REC-2B above.
(Parks)

REC Comment #10. 4.12.2.5 Cumulative Impacts and Mitigation Measures

LRDP Impact REC-4 recognizes the impacts of the University on the adjacent area, but Mitigation REC-4A defers mitigation to the project specific impacts as mitigation to be determined at a later date. This does not mitigate this impact; therefore the following mitigation measure should be incorporated into the 2008 LRDP as a policy and added to the DEIR as mitigation.

Alternative Mitigation Measure that is Adequate and Feasible

The cumulative impacts may be further reduced by the payment of impact fees (noted in REC-2C) so that agencies can provide for the current deficit that UCSB contributes to as well as new impacts from the 2008 LRDP. In addition, the University should also include a broader commitment to provide for recreation on campus for the general population.
(Page 4.12-28; Parks)
4.13. Transportation

The 2008 LRDP proposes a substantial amount of growth for its student population, faculty, staff and academic space. Implementation of the proposed UC Santa Barbara LRDP would degrade County of Santa Barbara intersection and roadway operations near the campus to unacceptable levels. Comments provided below address the traffic impact analysis and adequacy of proposed mitigation measures identified in the Draft EIR. Furthermore, the DEIR should disclose the assumption made in the baseline impacts as part of this DEIR for the pending development of North Campus.

This section also needs to differentiate impacts, mitigations, monitoring and supporting discussion between affected jurisdictions. Currently, the identified impacts use and contain different jurisdictions in within the DEIR proposed mitigations and supporting discussion. This is confusing and results in ineffective mitigation measures.

TRANS Comment #1. 4.13 Transportation and Circulation

The Table of Contents does not correspond to the main body of the report. Please revise for accuracy. A complete Table of Contents should be provided.
(Page 4.13-i, Public Works)

TRANS Comment #2. 4.13 Transportation and Circulation

Appendix 4.13-1: This section should be reorganized according to traffic scenario, AM count, and PM count and with roadways in alphabetical order to aid the reader in finding the information of interest.
(Page 4.13-iii, Public Works)

TRANS Comment #3. 4.13 Transportation and Circulation

Please use the proper names of the Caltrans facilities mentioned in the DEIR: SR 217 and US 101. Please revise the DEIR to be consistent in this usage throughout the document.
(Page 4.13-1, Public Works)

TRANS Comment #4. 4.13 Transportation and Circulation

The document should be clear that the Community of Isla Vista is in the unincorporated portion of the County of Santa Barbara and is subject to the County Comprehensive Plan, the Coastal Land Use Plan, the Goleta Community Plan, and the Isla Vista Master Plan.
(Page 4.13-1, Public Works)

TRANS Comment #5. 4.13 Transportation and Circulation

US 101/SR 217 and US 101/Fairview Avenue interchanges should be added to the DEIR as primary interchanges serving the UCSB campus in the 4th paragraph of this section.
(Page 4.13-1, Public Works)

TRANS Comment #6. 4.13 Transportation and Circulation

The DEIR omits discussions of Isla Vista roadway operational issues such as level of service and safety impacts associated with bicycle traffic and pedestrian traffic. Of particular significance, the
intersection level of service (LOS) at Embarcadero Del Norte and Pardall Road is greatly influenced by east-west bicycle pedestrian traffic. The DEIR needs to provide a level of service analysis, sensitivity to increases in pedestrian and bicycle volumes and an analysis and discussion of impacts caused by creating several vehicular access points to the main UCSB campus from IV roadways.

*TRANS Comment #7. 4.13 Transportation and Circulation*

Considering the high number of study locations on Embarcadero Del Norte, this roadway should be included in the description of local roadways. Without its inclusion, the DEIR’s assessment of 2008 LRDP impacts to local transportation networks is incomplete and, therefore, inadequate.

*TRANS Comment #8. 4.13 Transportation and Circulation*

Considering the volume of pedestrians and bicycle traffic on Pardall Road, this roadway should be included in the description of local roadways. Without its inclusion, the DEIR’s assessment of 2008 LRDP impacts to local transportation networks is incomplete and, therefore, inadequate.

*TRANS Comment #9. 4.13.1.1 Traffic Volumes*

Traffic volume count sheets are not included in the appendices. Without the actual count sheets the existing traffic conditions cannot be analyzed thoroughly for accuracy. Additionally, if the raw traffic volume counts have been adjusted in any way to derive a result (i.e. for pedestrians or bicycle traffic patterns and the associated impacts on ADTs), please provide both where the adjustment was made and describe the methodology for the adjustment. This disclosure is necessary to ensure the DEIR adequately mitigates the impacts to baseline transportation network conditions.

*TRANS Comment #10. 4.13 Transportation and Circulation*

Since Isla Vista is defined under the Isla Vista Master Plan as a community with unique boundaries, conditions, and issue areas, Isla Vista should be referred to as a community, instead of a neighborhood. Please revise accordingly.

*TRANS Comment #11. 4.13 Transportation and Circulation*

Red circles in graphs are in the wrong locations. The graphs should depict accurate information for the integrity of the DEIR. Without this correction, the DEIR is inadequate.

*TRANS Comment #12. 4.13.1.1 Traffic Volumes*

Study Intersections: The document identifies eleven (11) study intersections analyzed in the am peak. All intersections that were analyzed in the pm peak should also be analyzed in the am peak for project specific impacts as well as fair share contributions to cumulative impacts.
TRANS Comment #13. 4.13 Transportation and Circulation

The DEIR should refer to the Isla Vista Master Plan and the Goleta Community Plan for study intersections in Isla Vista.

(Page 4.13-4, Public Works)

TRANS Comment #14. 4.13.1.1 Study Roadways

Table 4.13-8. El Colegio/Los Carneros Rd and El Colegio/Embarcadero Del Norte should be highlighted as they operate at LOS “D” impact under the pm peak hour. It should be noted that the County LOS standard is “C”. The Isla Vista Master Plan LOS standard is “D” (IVMP FEIR 3.13 Transportation and Parking, page 3.13-29).

(Page 4.13-8, Public Works)

TRANS Comment #15. 4.13.1.1 Traffic Operations Methodology

Traffic Operations Methodology: Please specify the assumptions of the ICU methodology for signalized intersection analysis methodology, e.g., the saturation flow and lost time assumptions.

(Page 4.13-12, Public Works)

TRANS Comment #16. 4.13.1.1 Roadway System

Please revise Table 4.13-5 to include the design capacity for primary and secondary roadways in the City of Goleta and County of Santa Barbara. This information is necessary for understanding the volume to capacity ratios identified throughout the traffic analysis.

(Page 4.13-13; OLRP)

TRANS Comment #17. 4.13.1.1 Roadway System

Please revise Table 4.13-8. PM Peak LOS on El Colegio/Los Carneros and El Colegio /Embarcadero Del Norte at LOS D should be highlighted in yellow.

(Page 4.13-16; RDA)

TRANS Comment #18. 4.13.1.1 Roadway System

The volume to capacity (V/C) calculations in Table 4.13.9 and Table 4.13-39 are incorrect for City and County roadway segments. The DEIR analysis incorrectly uses the LOS C threshold volume instead of the roadway design capacity volume to calculate volume to capacity. These tables should be revised with the correct V/C information.

(Page 4.13-17 and 4.13-84; OLRP)

TRANS Comment #19. 4.13.11 Roadway System

Bicycle and Pedestrian Facilities: The DEIR proposes to designate at least five east-west routes from Isla Vista to Main campus (Page 4.13-24) for bicycle/pedestrian uses. This may impede the flow of traffic in IV, as bicycle users typically do not obey traffic controls. By spreading the east-west bicycle routes throughout the area, it would be very hard for northbound and southbound motorists to cross both protected and unprotected intersections. Instead, UCSB should designate less impeding bicycle routes using Pardall Road/Sueno Road and design them as a Bicycle Boulevards (bikes only).

(Page 4.13.20, Public Works)
TRANS Comment #20.  4.13.1.1 Roadway System

Bicycle and Pedestrian Facilities: Under past LRDPs, UCSB has an effective and comprehensive circulation system for bicyclists and pedestrians. However, it is unclear if this existing system will be maintained under buildout of the LRDP. Readers of the DEIR would benefit from the maps shown as figures 4.13-4a and 4.13-4b being modified to show existing and proposed bicycle routes. Where no future development is to occur, building footprints should appear on these maps to indicate where the existing system would be eliminated and how the new proposed system would link with existing system elements. This would aid in the full disclosure of known impacts and ability of identified mitigations to lessen these impacts.
(Page 4.13-20, Public Works)

TRANS Comment #21. 4.13.1.4 Parking

The DEIR is unclear with regard to which students, resident or otherwise, can purchase parking permits and where they can park.
(Page 4.13-27, Public Works)

TRANS Comment #22. 4.13.1.4 Parking

Parking should contain a methodology for determining the probability of how many vehicles are parked on a daily basis in Isla Vista by students, staff and faculty. The document does not sufficiently or clearly show the percentage of available spaces in Isla Vista likely being used on a typical day. The document omits an analysis of the impacts associated with the non-resident vehicles parking as close as possible to UCSB occupying available space closer to the main campus. The document also omits a discussion of how any increase in Isla Vista non-resident parking impacts spread to the west. The methodology presented in the document shows that a percentage of any increase in student population will mean an increase in non-resident Isla Vista Parking. The document does not provide this data and an associated analysis of potential impacts. The document does imply that the County could mitigate these impacts for UCSB by implementing a community parking permit program. UCSB is responsible for mitigating the impacts of the proposed LRDP and the document should discuss past failed attempts to implement a parking permit program due to opposition from many groups including the State of California Coastal Commission. Therefore, a parking permit program in Isla Vista implemented by the County is not feasible. A free parking permit program that encourages faculty, staff and students to utilize UCSB-provided parking may be viable. UCSB shall be responsible for the implementation and management of any parking permit program in Isla Vista since UCSB is responsible for mitigating impacts of their development plans.
(Page 4.13-27, Public Works)

TRANS Comment #23. 4.13.1.4 Parking

The University is planning to only provide an additional 100 parking spaces for the Main Campus. The limited parking spaces provided for the Main Campus seem not proportional for the magnitude of proposed development. The amount of parking increase provided should bear some relationship to the amount of staff increase and enrollment increase indicated in the plan.

Specific parking impacts to the Isla Vista Community are not addressed in the report. A significant amount of the campus parking demand is currently occurring on public roadways in the Isla Vista area. Enrollment and staffing increases, without associated parking provisions, will increase demand for parking in Isla Vista as well as resultant traffic increases associated with the search for available parking. A comprehensive parking demand, supply, & management study for the Isla Vista Community
should be provided to identify adequate mitigation to the impact of additional parking demand to the neighboring communities.

(PAGE 4.13-27, Public Works)

TRANS Comment #24. 4.13.1.4 Parking

Please disclose why the parking study did not include the am (7-9) and pm (4-6) peak hours when the study in Isla Vista did. This should have been disclosed to show the correlation between the a.m. and p.m. peak travel times and to be consistent with the Isla Vista parking analysis.

(PAGE 4.13-29; Public Works)

TRANS Comment #25. 4.13.1.4 Parking

Parking histogram: This chart should be expanded to include the am and pm peak hours to be consistent with the analysis period of interest and to be consistent with the IV parking study, which did include the roadway peak hours of operation.

(PAGE 4.13-29, Public Works)

TRANS Comment #26. 4.13.1.4 Isla Vista Parking

Table 4.13-16: This table provides the reader with survey information and statistical data. The table should be expanded to provide the reader with a margin of error.

(PAGE 4.13-35, Public Works)

TRANS Comment #27. 4.13.1.4 Isla Vista Parking

Table 4.13-16: The total responses for Non-UCSB/Non-Isla Vista Housing do not track with "Have a car while at UCSB" as they do in the previous columns. It also seems odd that all of the total responses for this column also do not have an on-campus permit. Additionally, the "total surveyed" does not appear to be a summation of the data in the columns.

(PAGE 4.13-35, Public Works)

TRANS Comment #28. 4.13.1.4 Parking

The DEIR text on page 4.13-35 references Table 4.13-15B which is a summary of the amount of parking occurring in Isla Vista instead of in on-campus parking lots. This table is missing from the impact analysis and should be included to fully understand the scope of existing off-campus parking impacts in Isla Vista.

(PAGE 4.13-35; OLRP)

TRANS Comment #29. 4.13.1.4 Isla Vista Parking

Table 4.13-17: This table provides statistical data that is not clearly presented. The table should provide an average weighted utilization rate that is based on the number of school days per month. For reference, County staff calculates this rate to be approximately 32%. The paragraph following table 4.13-17 provides data that calculates to a rate of 25% (885/3480) and page 4.13-35 claims a utilization rate of 40%. The data in this section should be reevaluated for consistency and a standard methodology should be applied to the survey results that does not ignore the user groups that park in Isla Vista on a less than often basis.

(PAGE 4.13-36, Public Works)
TRANS Comment #30. 4.13.1.4 Goleta Beach Parking

Table 4.13-18: This table provides statistical data that is not clearly presented. The table should provide an average weighted utilization rate that is based on the number of school days per month. The data in this section should be reevaluated for consistency and a standard methodology should be applied to the survey results that does not ignore the user groups that park at Goleta Beach on a less than often basis.
(Page 4.13-37, Public Works)

TRANS Comment #31. 4.13.1.4 Parking

Proposed LRDP Parking First Paragraph: The LRDP states that since “new students and faculty/staff would reside in University owned housing under the LRDP, additional parking on the main campus for commuters would be minimal”. Unless there are restrictions placed on the new students, prohibiting cars, it should be assumed, and documented numerically, that there will be an increase in parking in Isla Vista and surrounding communities.
(Page 4.13-38, Public Works)

TRANS Comment #32. 4.13.1.4 Parking

The DEIR and 2008 LRDP propose to reduce the available parking from 1 space for every 4 students to 1 space for every 4.6 students. Tables 4.13-12 and 4.13-13 indicate an average parking utilization rate between 66% and 80%. Given that 60% of UCSB students have a car, it is reasonable to assume that the proposed population growth and academic space increases will require additional parking spaces beyond the proposed 3,650 under the 2008 LRDP.
(Page 4.13-38; Public Works)

TRANS Comment #33. 4.13.1.5 Motorized Vehicle Travel Patterns

Paragraph Two: The DEIR identifies that cut-through traffic was analyzed that bypasses afternoon congestion on US 101 during the afternoon peak periods. If this is true, then the DEIR appears to be lacking in the analysis of mid-day peak conditions. The DEIR should be revised to reflect a mid-day analysis to identify project specific impacts, the LRDP's cumulative impacts and the LRDP fair share contribution to the identified impacts.
(Page 4.13-40, Public Works)

TRANS Comment #34. 4.13.1.5 Campus Travel Characteristics

Transportation System Management: The free student bus passes referenced in the document are the result of a student passed fee to provide the amenity. It is possible that students will vote at a later date whether to continue this program. If this amenity is not renewed through a student vote, it will call into question the existing 6% student transit utilization rate cited in the EIR (see 4.13-25). The document should analyze traffic and circulation impacts associated with a decline in transit ridership due to the lack of a free bus pass or propose securities to continue the free bus pass program in the event the student fee is revoked.
(Page 4.13-42, Public Works)
TRANS Comment #35. 4.13.1.5 Campus Travel Characteristics

Mitigation in the DEIR places significant value on the UCSB TAP program to help mitigate impacts associated with buildout of the LRDP. To assess the effectiveness of this mitigation, figures regarding existing TAP utilization under current campus characteristics need to be provided. If mitigation relies on the success of expanding program elements to mitigate for LRDP traffic impacts, then information needs to be provided to assess how the existing program is performing.

(Page 4.13-42, Public Works)

TRANS Comment #36. 4.13.1.6 Local Goals and Policies

This section should include references to the County of Santa Barbara Goleta Community Plan and the Isla Vista Master Plan

(Page 4.13-44, Public Works)

TRANS Comment #37. 4.13.1.5 Transportation System Management

Table 4.13-23: This table is based on the results of a 2002 survey. The results of this survey are arguably outdated and may not be applicable due to their age. The DEIR should be revised to reflect a current survey, no more than two years old.

(Page 4.13-44, Public Works)

TRANS Comment #38. 4.13.1.5 Transportation System Management

Paragraph One: The DEIR references “the number of faculty/staff bicycling and walking to campus is 16 percent higher for those residing in University-owned housing, Isla Vista and Goleta”. Although this may be true, it is not apparent how this number was calculated. The user group that is 16 percent higher than another group is not clearly identified. Please explain the calculation in the DEIR.

(Page 4.13-44, Public Works)

TRANS Comment #39. 4.13.2 Impacts and Mitigation Measures

LRDP Mitigation TRAFFIC-2A (3) and the associated LRDP growth will create impacts to Isla Vista intersections. Increases in faculty, staff, and students, even those living on campus, result in increased traffic in Isla Vista, particularly bicycle and pedestrian related trips. It is reasonably foreseeable that LRDP development will utilize the Isla Vista transportation network for a portion of their trips. Impacts to the Isla Vista transportation network are not assessed in the EIR, and no mitigations are proposed. The DEIR should be revised to address this omission

(Table 4.13-44, Page 4.13-106; RDA)

Alternative Mitigation Measure that is Adequate and Feasible

In 2006 the County of Santa Barbara, Department of Public Works completed the Isla Vista Sidewalk Study. The purpose of this study was to identify strategies for improving sidewalks in Isla Vista between the UCSB Main Campus western boundary and Camino Pescadero. The study determined that it would cost approximately $20,166,000 to improve the sidewalks' conditions and connectivity. The improved sidewalk network will be necessary to safely serve the increased pedestrian traffic associated with build out of the proposed LRDP, and it would be consistent with the Isla Master Plan.

The proposed mitigation is inadequate because it does not appropriately address the physical impacts associated with the increases in bicycle and pedestrian traffic that will occur in Isla Vista.
The following mitigation measures should be incorporated into the DEIR to ensure that the impacts of the proposed LRDP remain less than significant:

1) Provide funding to implement the Sueno Bicycle Boulevard project which is identified on Page 2-15 of the adopted Isla Vista Master Plan prior to the issuance of an NOID for the Ocean Road or Devereux site housing.

2) Provide fair share funding to implement the 2006 Isla Vista Sidewalk Initial Study to meet the Isla Vista Master Plan standards.

3) Implement project to improve UCSB/Isla Vista street connections for bicycle and pedestrian traffic only, which is identified on Page 4-69 of the adopted Isla Vista Master Plan prior to the issuance of a NOID for the Ocean Road Housing Project.

4) fund improvements to Isla Vista intersections as identified on Page 2-27 to improve bicycle circulation including, but not limited to:
   i) Embarcadero Loop street improvements
   ii) El Embarcadero Street improvements
   iii) Camino Pescadero street improvements
   iv) Sabado Tarde Road improvements
   v) Camino Del Sur improvements
   vi) Pardall Road improvements between current RDA project and the Main Campus
   vii) Del Playa Drive improvements
   viii) Small Rotary implementation

TRANS Comment #40. 4.13.2 Impacts and Mitigation Measures

The LRDP identifies proposed 'Isla Vista Connections' to improve access to the campus along the proposed Ocean Road development. It is unclear if these connections are proposed to allow vehicular access between Ocean Road and Isla Vista. If these connections are proposed to allow vehicular access, the DEIR must analyze the impacts of increased trips through Isla Vista, especially on Isla Vista intersections. The DEIR does not evaluate potential impacts associated with the proposed Isla Vista Connections and should be revised to address this omission.

(Table 4.13-44, page 4.13-106; RDA)

Alternative Mitigation Measure that is Adequate and Feasible

Provide funding to the County to construct improvements necessary to impacted Isla Vista streets to meet the adopted County levels of service policies prior to any Isla Vista connection that allows vehicular traffic.

TRANS Comment #41. 4.13.1.6 UC Santa Barbara 2008 LRDP

UC Santa Barbara 2008 LRDP: This section lacks any reference to the IV Master Plan goals and policies. The section should be updated to reflect the goals and policies associated with this approved County document.

(Page 4.13-49, Public Works)

TRANS Comment #42. 4.13.1.6 UC Santa Barbara 2008 LRDP

While never completed under the 1990 LRDP, the designated improvements of Mesa Road should be completed. This would help mitigate impacts to the relatively few regional east-west roadways. Mesa Road can then become a local access road to the Main Campus. LRDP Policy TRANS-8 should be amended to state “Mesa Road shall be widened...” as this is a critical transportation corridor.
Consistent with mitigation proposed by the County in Section 4.3 Biology, any widening of Mesa Rd should not encroach into designated Environmentally Sensitive Habitat Areas.
(Page 4.13-50, Public Works)

TRANS Comment #43.  4.13.2.1 Standards of Significance

Bullet Two: The County threshold for traffic level of service is LOS “C”. This information should be revised to reflect the correct LOS for the County.
(Page 4.13-52, Public Works)

TRANS Comment #44.  4.13.2.1 Standards of Significance

Bullet Three: The DEIR states that a significant impact would occur on County of Santa Barbara roadways operating at LOS C if the 2008 LRDP project increased daily traffic volumes by 1%. However, the DEIR should clarify that any increase in traffic related to a 2008 LRDP project that creates LOS “C” on County roadways or LOS “D” on Isla Vista roadways should be considered a significant impact and mitigated accordingly.
(Page 4.13-52, Public Works)

TRANS Comment #45.  4.13.2 Impacts and Mitigation Measures

The County supports the completion of Phelps Road extension which is a very important component of impact mitigation for UCSB traffic impacts to the existing east-west corridors, as well as for emergency access. If Phelps Road is also connected to the new proposed east-west road at Los Carneros, the benefits would be significant. This option should be analyzed in the DEIR.
(Page 4.13-52, Public Works)

TRANS Comment #46.  4.13.2 Impacts and Mitigation Measures

Although Cathedral Oaks Road is a major collector, it is extremely sensitive to volume and speed impacts because of its residential nature for much of the route. For this reason, it is critical to the County that UCSB mitigate traffic impacts to east-west routes in the immediate campus area to avoid spillover as congestion occurs. The DEIR needs to specifically discuss impacts to all east-west roadways in the region and propose specific mitigation measures. The DEIR should include a discussion regarding the operation of each east-west roadway including analysis and discussion of impacts to Cathedral Oaks Road when breakdowns in levels of service occur on the limited number of alternative east-west routes.
(Page 4.13-52, Public Works)

TRANS Comment #47.  4.13.2 Impacts and Mitigation Measures

Please revise second bullet in the significance threshold discussion for County intersections along El Colegio Road and the Los Carneros Road/Mesa Road intersection. The significance threshold is LOS C not LOS D as noted in the discussion. Additionally, LRDP Impact TRAFFIC-1, associated mitigations and supporting discussion should remove any reference to the County of Santa Barbara, as this impact is relevant to the City of Goleta, not the County of Santa Barbara, which is analyzed in the DEIR under LRDP Impact TRAFFIC-2.
(Page 4.13-52; OLRP)
TRANS Comment #48.  4.13.2 Impacts and Mitigation Measures

LRDP Impact TRAFFIC-2 and its proposed mitigations are inadequate. As phases of the LRDP are permitted/constructed, a fee schedule agreement should be finalized to afford the cost of improvements at the time of construction to mitigate the impacts that occur within each phase. LRDP Impact TRAFFIC-2, associated impacts and supporting discussion need to remove all references to the City of Goleta, as the City is a separate jurisdiction from the County of Santa Barbara.

(Page 4.13-52-55, OLRP)

Alternative Mitigation Measure that is Adequate and Feasible

1) UCSB shall pay the County of Santa Barbara development impact fee\(^9\) (AB 1600) for transportation pursuant to the Development Impact Fee (AB-1600) as currently calculated by the County of Santa Barbara to mitigate the impacts of the 2008 LRDP to transportation levels of service and facilities, and as calculated by the County of Santa Barbara at the time of the issuance of the Notice of Impending Development (NOID), and

2) UCSB shall pay the fair share for the ongoing cost for funding this public service in the amount of $76,700 and shall be revised annually by a percentage equal to the adjustment equal to the annual percentage change in the April Consumer Price Index ("CPI – All Urban Consumers") for the Los Angeles-Anaheim-Riverside Region. Adjustments shall be increased up to the nearest five-cent increment. Adjustments shall automatically become effective on the first day of November at which time payment is due each year without amendment. The payment of UCSB’s fair share of ongoing costs may be offset by direct revenues specifically generated by UCSB and its related population in Isla Vista as described in Attachment B.

TRANS Comment #49.  4.13.2 Impacts and Mitigation Measures

As illustrated by road patterns depicted Figure 1 of this document, mitigation to east-west roadways is imperative to prevent major impacts at already poorly operating locations. The DEIR should address the limited east-west roadways in the region. An analysis should be performed that considers all of the east-west regional roadways including each route’s sensitivity to breakdowns in levels of service. Roadways such as Cathedral Oaks Road, US 101, and Hollister Avenue should be analyzed. The DEIR mitigation is inadequate and ineffective in these areas. UCSB should mitigate their impacts by assisting the County of Santa Barbara with any necessary improvements to the County transportation infrastructure deemed necessary to mitigate impacts to traffic and air quality. Additionally, project-specific mitigations may also be necessary to ensure that project specific impacts are less than significant.

(Page 4.13-52, Public Works)

Alternative Mitigation Measure that is Adequate and Feasible

UCSB shall pay the County of Santa Barbara for its fair share of improvements to County of Santa Barbara transportation infrastructure including, but not limited to, intersection and roadway segment improvements listed below.
## Projected Required Mitigation Projects

<table>
<thead>
<tr>
<th>Project Description</th>
<th>Estimated Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>ROADWAYS</strong></td>
<td></td>
</tr>
<tr>
<td>1 Los Carneros Road Widening</td>
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<tr>
<td>2 Phelps Road Extension</td>
<td>UCSB</td>
</tr>
<tr>
<td>3 Fowler Road Extension</td>
<td>City of Goleta</td>
</tr>
<tr>
<td>4 Storke Road Widening</td>
<td>$4,000,000</td>
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<tr>
<td>5 Hollister Widening from San Antonio Road to SR 154</td>
<td>$19,700,000</td>
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<tr>
<td>6 Turnpike Road Widening from Calle Real to Cathedral Oaks Road</td>
<td>$6,500,000</td>
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<tr>
<td>7 US 101 Widening – 6 Lanes from Storke Road to Fairview Road</td>
<td>Caltrans</td>
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<tr>
<td><strong>INTERSECTIONS</strong></td>
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</tr>
<tr>
<td>8 Los Carneros Road/Mesa Road Intersection Improvements</td>
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</tr>
<tr>
<td>9 Hollister Avenue/Storke Road Intersection Improvements</td>
<td>City of Goleta</td>
</tr>
<tr>
<td>10 El Colegio Road/Storke Road Intersection Improvements</td>
<td>$2,500,000</td>
</tr>
<tr>
<td>11 Turnpike Road/Calle Real Intersection Improvements</td>
<td>$2,000,000</td>
</tr>
<tr>
<td>12 Hollister Avenue/Patterson Avenue Intersection Improvements</td>
<td>$2,500,000</td>
</tr>
<tr>
<td>13 Hollister Avenue/Storke Road Intersection Improvements</td>
<td>City of Goleta</td>
</tr>
<tr>
<td>14 Hollister Avenue/Los Carneros Road Intersection Improvements</td>
<td>City of Goleta</td>
</tr>
<tr>
<td>15 Traffic Signals – Various Locations (4 Intersections)</td>
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<td><strong>SUB-TOTAL</strong> $11,550,000</td>
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<td><strong>NEIGHBORHOOD TRAFFIC MANAGEMENT</strong></td>
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<td>16 Traffic Calming Devices</td>
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<td><strong>INTERCHANGES</strong></td>
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<td>17 US 101/SR 217/Patterson Avenue Interchange Improvements</td>
<td>Caltrans</td>
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<tr>
<td>18 US 101/Storke Road/Glen Anne Road Ramp Intersection Improvements</td>
<td>Caltrans</td>
</tr>
<tr>
<td>19 US 101/Los Carneros Road Ramp Intersection Improvements</td>
<td>Caltrans</td>
</tr>
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<td>20 US 101/Fairview Road/Calle Real Interchange Improvements</td>
<td>Caltrans</td>
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<tr>
<td>21 US 101/Turnpike Road Ramp Intersection Improvements</td>
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<tr>
<td>22 US 101/Hollister Avenue Interchange Improvements</td>
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<td><strong>ISLA VISTA</strong></td>
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<td>23 Embarcadero Loop Roadway Improvements</td>
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<td>24 El Embarcadero Roadway Improvements</td>
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<td>26 Sabado Tarde Roadway Improvements</td>
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</tr>
<tr>
<td>27 Camino Del Sur Roadway Improvements</td>
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<tr>
<td>28 Pardall Road from Embarcadero Del Norte to UCSB</td>
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<tr>
<td>29 Del Playa Drive Roadway Improvements</td>
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<td>30 Embarcadero Del Norte/Pardall Road Intersection Improvements</td>
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<td>31 Embarcadero Del Mar/Pardall Road Intersection Improvements</td>
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<td>32</td>
<td>El Embarcadero Intersection Improvements</td>
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<tr>
<td>33</td>
<td>Isla Vista Traffic Calming</td>
</tr>
<tr>
<td>34</td>
<td>Isla Vista Sidewalks – Sidewalk In-Fill Various Locations</td>
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<tr>
<td></td>
<td><strong>BIKEWAY IMPROVEMENTS</strong></td>
</tr>
<tr>
<td>35</td>
<td>San Jose Creek Class I Bike path - Cathedral Oaks to Hollister</td>
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<tr>
<td>36</td>
<td>San Jose Creek Class I Bike path - Hollister Ave. to Goleta Beach</td>
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<tr>
<td>37</td>
<td>Ekwill St. Class I Bike path - Ekwill to Maria Ygnacia Creek</td>
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<tr>
<td>38</td>
<td>Patterson Ave Class II Lanes-Hollister Ave to Atascadero Creek Bike Path</td>
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<tr>
<td>39</td>
<td>Patterson Ave Class II Lanes - Cathedral Oaks to Calle Real</td>
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<tr>
<td>40</td>
<td>Obern Trail - Pedestrian Trail, Bikepath</td>
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<tr>
<td>41</td>
<td>San Antonio/Maria Ygnacia - Class I Bike path Improvements</td>
</tr>
<tr>
<td>42</td>
<td>San Pedro Class I Bike path - From Fowler Road to Goleta Beach</td>
</tr>
<tr>
<td>43</td>
<td>Bike Racks and Bike Lockers - Various Locations</td>
</tr>
<tr>
<td>44</td>
<td>Bikeway Signage Program-Continue On - Going Bikeway Signage Program</td>
</tr>
<tr>
<td>45</td>
<td>Class I Bikeway Lighting - Illuminate Key Class I Facilities</td>
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<tr>
<td></td>
<td><strong>TRANSIT IMPROVEMENTS</strong></td>
</tr>
<tr>
<td>46</td>
<td>Purchase Battery Chargers - 5 Battery Chargers for Recharging Shuttles</td>
</tr>
<tr>
<td>47</td>
<td>Purchase of Shuttles - New Transit Route, Patterson/Turnpike-4 Shuttles</td>
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<td>48</td>
<td>Purchase of Busses - New Transit Route, Santa Barbara/Fairview Express</td>
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<td>49</td>
<td>Purchase of Busses - 2 New busses to maintain Trunk Line Level of Service</td>
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<tr>
<td>50</td>
<td>Bus Stops - Construct Bus Stops, Turnouts &amp; Pavement Reinforcement</td>
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<tr>
<td>51</td>
<td>Passenger Boarding Improvements - Provide ADA Access Improvements</td>
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<td></td>
<td><strong>SIDEWALK IMPROVEMENTS</strong></td>
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<td>52</td>
<td>Hollister Avenue, Puente Drive, Etc.</td>
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<td><strong>SUB-TOTAL:</strong></td>
</tr>
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<td></td>
<td><strong>PLAN ADMINISTRATION</strong></td>
</tr>
<tr>
<td>53</td>
<td>Model, Cost Estimates and Fee Calculation Updates</td>
</tr>
<tr>
<td>54</td>
<td>Project Study Reports</td>
</tr>
<tr>
<td>55</td>
<td>Future Plan Administrative Costs</td>
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<td><strong>SUB-TOTAL:</strong></td>
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</tbody>
</table>

Notes:
The County of Santa Barbara, Department of Public Works reserves the right to revise this improvement list and total cost estimates provided above, as well as revise the payment calculation shown below. Significant mitigations including project specific mitigations may be identified as further information is obtained from the University of California, Santa Barbara.
Projects listed for jurisdictions other than the County of Santa Barbara were included to disclose in full the improvements needed to mitigate impacts to the operations of the County transportation network.
Projects shown in bold are included in the current Goleta Transportation Improvement Plan (GTIP).

UCSB LRDP Transportation Mitigation Payment Calculation:

- Trips - Remaining in Current Plan (1,841) Plus UCSB LRDP (7,282) = 9,223
- Revised Peak Hour Trip Cost (Current Plan plus UCSB LRDP) = $12,240
- 0.62 PHTs/Apartment x Revised GTIP Fee = $7,589

Attachment A: Santa Barbara County Comment Letter
UCSB Vision 2025 LRDP & DEIR SCH # 2007051128
84
### Attachment A: Santa Barbara County Comment Letter

**UCSB Vision 2025 LRDP & DEIR SCH # 2007051128**

<table>
<thead>
<tr>
<th>Description</th>
<th>Quantity</th>
<th>Unit Cost</th>
<th>Sub-Total</th>
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<tbody>
<tr>
<td>LRDP Proposed Apartments</td>
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<td>$22,470,734</td>
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<tr>
<td>0.52 PHTs/Townhouse x Revised GTIP Fee</td>
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<tr>
<td>LRDP Proposed Townhouses</td>
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<td>2.54 PHTs/1000 Sq. Ft.</td>
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<td>Proposed Square Feet (1000s)</td>
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<td><strong>Total UCSB LRDP Transportation Mitigation Payment</strong></td>
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<td>$90,360,545</td>
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*Total Mitigation Payment subject to changes annually by Construction Cost Index (CCI)*

The above project list is based on the Goleta Transportation Improvement Plan (2007 Cost Estimates Update) and the Isla Vista Sidewalk Initial Study (County of Santa Barbara, Department of Public Works, 2006). Mitigation measures for UCSB LRDP impacts to any and all County of Santa Barbara transportation facilities listed above, as shown in TRANS Comments Figure 1 below and as proposed in all of the comments in this document are subject to further refinement as UCSB provides more information.
Figure 1: 2008 LRDP DEIR Transportation Mitigation Improvement Projects
TRANS Comment #50. 4.13.2 Impacts and Mitigation Measures

The number of County intersections included in the analysis is inadequate, particularly in Isla Vista. Proposed Campus growth could be reasonably foreseeable to increase UCSB trips by an estimated 25-35%. That level of increase will have impacts to County roadways and intersections throughout the South Coast. (Page 4.13-52-103, RDA)

Alternative Mitigation Measure that is Adequate and Feasible

An analysis of Isla Vista intersections on Embarcadero Del Norte for the proposed project has not been provided within the document in tabular form and must be included to disclose and mitigate the inevitable decrease in service and associated impacts on air quality, noise, and surrounding resources at these Isla Vista intersections and roadways. Furthermore, the “with project” analysis should have included a discussion and analysis of the seven proposed roadway connections to Ocean Road from the Isla Vista area.

TRANS Comment #51. 4.13.2.2 Mitigation Measures

According to the DEIR, significant development is still pending under the 1990 LRDP, including 976 beds, 151 student family units, and 172 faculty and staff units, as conditions under 2025 No Project. However, these increases in development and population are not considered as part of the baseline population for the DEIR analysis. Instead, the DEIR analysis considers the average enrollment of 20,000 students and 4,685 faculty and staff as the baseline, which inaccurately represents the total UCSB population in the 2007-08 school year. Table 4.13-26 should be revised to depict actual population numbers as the baseline compared to 2025 plus LRDP population projections (5,000 additional students, and 1,700 faculty and staff) for the DEIR impact analysis. (Page 4.13.54, OLRP, Public Works)

TRANS Comment #52. 4.13.2.2 Analytical Method

The DEIR analyzed 41 intersections for the PM peak hour, but it only analyzed 11 intersections for the AM peak hour. The document should analyze all 41 intersections for both AM and PM peak hour conditions. Although the DEIR notes that some of the area roadways and intersections show more total traffic during the PM peak hour, the AM traffic volumes indicated at the selected locations show much stronger directional movements and higher one-way traffic flows especially toward the campus in the AM peak hour. Critical traffic conditions near college campuses are more likely to be found during the AM peak hour, since the majority of students take classes that begin during AM peak period, while relatively few classes end during the PM peak period. It is more likely that traffic impacts would be found during the AM peak hour, especially for intersections within or near the campus. Thus, the analysis to be conducted for AM peak hour is very important to determine the impact of the project.

In addition, to identify potential project impacts or cumulative impacts, the study area should have included the following areas:

- Roadway segments and major intersections along Cathedral Oak Road,
- (Additional) roadway segments and major intersections within the Isla Vista Community
- Roadway segments and major intersections within County of Santa Barbara unincorporated areas, northeast of the campus
In general, the LRDP study area should be determined based on the CMP criteria and study guidelines for UCSB, City of Goleta, Isla Vista Community, County of Santa Barbara, and Caltrans. 

(Page 4.13-54, Public Works)

**TRANS Comment #53. 4.13.2.2 Analytical Method**

The DEIR indicates that the LRDP will generate a total of 27,276 daily trips with 1,604 AM peak hour trips and 2,170 PM peak hour trips. The adequacy of the trip rate (for instance, the trip rate for student apartment) should be presented. Table 4.13-28 of the DEIR proposes a 25% internalization (reduction) of trips within the Main Campus. However, the 25% trip reduction of the daily and AM and PM peak hour volumes cannot be replicated based on the assumption. In addition, Table 4.13-31 fails to provide detailed information on how the trips for the 25% internalization of trips between Storke & West Campus Housing & Main Campus have been calculated. It is likely that such internalized trips will leave one side of the campus and use streets in the Isla Vista Community to travel to the other side of the campus. The EIR may thus underestimate traffic impacts on streets in Isla Vista and on El Colegio Rd. by reducing the traffic generation forecast based upon internalized trips.

(Page 4.13-54, Public Works)

**TRANS Comment #54. 4.13.2.2 Analytical Method**

Project trip distributions are not provided in the DEIR. A traffic study and traffic impact section of an EIR must indicate roadways that are expected to experience traffic increases and the numerical traffic volumes associated with the project on each roadway. The project trip distribution should be based upon an objective source or reliable origin/destination study. For this study the traffic model should provide a select zone analysis indicating the distribution of project trips and the resultant traffic volumes in the AM and PM peak hours. The study documents provided do not allow for the identification of the volume of traffic increase associated with each roadway, because the volumes are not documented and the traffic model can unintentionally mask project traffic increases during the traffic assignment process, thus underestimating the traffic volumes and potential impacts.

(Page 4.13-54, Public Works)

**TRANS Comment #55. 4.13.2.2 Analytical Method**

The report mentioned bicycle and pedestrian issues on and off campus. It also suggests designating five new east-west connections between Isla Vista and the Main Campus (Page 4.13-24) for bicycle/pedestrian uses. The plan also proposes to discourage use of Pardall Road, which is the main bicycle route connecting the Isla Vista Community to the main campus, passing through an underpass into the campus aligned with the main east/west bicycle corridor within the campus.

The plan to deemphasize Pardall Road is not advisable. Bicycle users often do not obey stop signs and other static traffic controls. By spreading the bicycles on other roadways throughout the area, it will become more difficult for northbound and southbound motorists to travel through intersections with more frequent east/west bicyclists. The LRDP should continue to encouraging bicycles to use and be concentrated along Pardall Road/Sueno Road, and these roads should be further enhanced as Bicycle Boulevards to provide the most appropriate method of circulation for bicyclists. The Isla Vista Community Master Plan should be further referenced in order to properly plan for and participate in the improvement projects for Isla Vista. The task of managing the extremely high bicycle traffic volumes between Isla Vista and the campus will be greatly complicated by de-emphasis of the Pardall bike route and the proposed elimination of the grade separation of Pardall Road at Ocean Road.

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In addition, the intersection analysis didn’t consider the impact of bicycle movements at several locations where their inclusion would seriously affect the results. For instance, the intersection of Pardall Road at Embarcadero del Norte is shown as LOS B during the existing PM peak hour. This is because all east/west bicyclists were excluded from the traffic count used for the analysis. If bicycle volumes were counted and properly considered, we believe that the intersection would be evaluated at LOS F under existing conditions based on field review of traffic flows and delays to the stopped street movements. We estimate that up to 20,000 bicycle trips per day are being made along Pardall Road on a typical school day.

(Page 4.13-54, Public Works)

TRANS Comment #56. 4.13.2.2 Analytical Method

All forecast turning movement volumes for all scenarios illustrated on Figure 4.13-8 through 4.13-11 should be reasonable. Explain why the southbound left turn volumes for intersection #15 are decreased by 110 vehicles from 2025 NP to 2025 With LRDP conditions. Also, explain why the westbound volumes for intersection #34 are decreased from the existing condition to 2025 No Project conditions. (Page 4.13-65) If proper traffic modeling and forecasting practices are followed, this type of reduction should not occur.

(Page 4.13-54, Public Works)

TRANS Comment #57. 4.13.2.2 Analytical Method

The intersection and roadway ICU analysis in the DEIR for the roadway geometric conditions did not assume the completion of the City of Goleta’s GTIP roadway improvements.

In reviewing the ICU and HCM calculation worksheets, it appears that a few intersection ICU and delays may be calculated incorrectly. For instance, the intersection of Fairview Street at 101 Northbound Ramp shows incorrect geometry conditions. The Intersection of Camino del Sur at El Colegio has stop control placed along El Colegio instead of Camino del Sur for the analysis. Errors in calculations of level of service can result in failure to properly identify deficiencies and impacts.

(Page 4.13-54, Public Works)

TRANS Comment #58. 4.13.2.2 Analytical Method

Table 4.13-42 through Table 4.14-45 documented the intersection analysis results under the With Mitigation conditions. However, those improvements are not included in the bullet lists on Page 4.13-96 through Page 4.13-97. Please list mitigation measures for each intersection and illustrate the improvements on a geometry improvement figure. (Page 4.13-96) The scope and extent of improvements required may be underestimated. For example, if two turn lanes are required as a mitigation measure, the receiving roadway must have two lanes. This may result in the need to provide additional lanes on roadway segments continuously from one intersection to another.

(Page 4.13-54, Public Works)

TRANS Comment #59. 4.13.2.2 Analytical Method

The fair-share calculation based on the AM and PM peak hour project volume contributions are not included in the report. The cost estimates for the intersection improvements are also missing from the report. The relative cost and fair share participation should be known in order to determine if the mitigation measures are feasible, if alternate measures should be considered, and if the contribution by all UCSB traffic growth is included in the fair share calculation.

(Page 4.13-54, Public Works)
TRANS Comment #60.  4.13.2.2 Analytical Method

Traffic volume count sheets are not included in the appendices. Provide the actual count sheets for review. There are anomalies in the existing traffic counts provided that would be verified or explained by the raw traffic counts. If the raw counts have been adjusted for the analysis, please provide the location and methodology of the adjustment. Specify the assumptions of the ICU methodology for signalized intersection analysis methodology, e.g., the saturation flow and lost time assumptions.

(Page 4.13-54, Public Works)

TRANS Comment #61.  4.13.2.2 Proposed UC Santa Barbara LRDP

Table 4.13-27: The table should be revised to show the net difference between each scenario along the time line (i.e., existing to cumulative, cumulative to cumulative plus LRDP).

(Page 4.13-56, Public Works)

TRANS Comment #62.  4.13.2.2 Proposed UC Santa Barbara LRDP

Figure 4.13-7: This figure should show existing and proposed lane geometrics at each intersection under the LRDP. This would indicate what will happen at each intersection in a graphical format that should be easier to understand.

(Page 4.13-57, Public Works)

TRANS Comment #63.  4.13.2.2 Proposed UC Santa Barbara LRDP

Graphic Plots: The four graphic plots should be moved to the Trip Generation section to be consistent with the text.

(Page 4.13-58, Public Works)

TRANS Comment #64.  4.13.2.2 Trip Generation

Paragraph Two: A detailed Trip Generation Study should be included in the technical appendices.

(Page 4.13-58, Public Works)

TRANS Comment #65.  4.13.2.2 Analytical Method

Student Housing trip generation estimate of 2.16 average daily trips (ADT) per student appears to be underestimated. For instance, Santa Catalina housing residents have a history of driving to classes on campus or parking close to campus in IV to avoid walking, riding a bike, or taking the bus. The DEIR should assess the reported estimate of ADT for remote campus housing uniquely from the average trip rate and compare with rates at other residence halls, and published national standards.

(Page 4.13-59; RDA)

TRANS Comment #66.  4.13.2.2 Trip Generation

The tables on this page do not reflect the project specific trip generation. A new table should be added that shows projected trips associated with each phase of development of the 2008 LRDP.

(Page 4.13-60, Public Works)

TRANS Comment #67.  4.13.2.2 Trip Generation

Table 4.13-28 includes 25% internalization of trips within Main Campus. However, the 25% trip reduction of the daily and AM and PM peak hour volumes cannot be replicated based on the...
assumption. In addition, Table 4.13-31 fails to provide detail information with how the trips for the 25% internalizations of trips between Storke & West Campus Housing & Main Campus have been calculated. Please revise accordingly and provide methodology information.
(Page 4.13-60, Public Works)

TRANS Comment #68. 4.13.2.2 Trip Generation

The DEIR fails to provide project-specific trip distribution figures. In addition, no project-specific traffic volume figures have been provided either. Please provide all project specific data based on a 2008 LRDP phasing plan.
(Page 4.13-60, Public Works)

TRANS Comment #69. 4.13.2.2 City of Goleta Traffic Model

Though the DEIR is clear that the City of Goleta’s calibrated traffic model has been used in the analysis and mitigation of transportation impacts, it provides no clear discussion of the assumptions or methodology applied in the model. Judging by the large scale and nature of the proposed development, it is reasonable that many assumptions were needed to complete the model and the traffic analysis. Without disclosure of the assumptions and methodology applied, the findings in the DEIR are unsubstantiated and, therefore, the DEIR is inadequate. All assumptions in the methodology should be released in a traffic modeling report for the DEIR and clearly disclosed in Section 4.13 of the DEIR.
(Page 4.13-61, Public Works)

TRANS Comment #70. 4.13.2.2 City of Goleta Traffic Model

Page 4.13-61 indicates that City of Goleta traffic model forecasts p.m. peak hour volumes under Year 2030. However, the source for the peak hour trip generation rates is not disclosed or justified in the DEIR for the land use categories of Student Family Housing Units and Faculty Housing Units. Additionally, the DEIR does not describe or justify modifications to the trip generation rates specifically for the 2008 LRDP project description. There is no further discussion of how the a.m. forecasts have been generated. Please provide detail modeling data for a.m. forecasts. These trip generation rate details should be disclosed and explained in the DEIR. Without these details, the findings and mitigations proposed by the DEIR are unfounded and inadequate.
(Page 4.13-61, Public Works)

TRANS Comment #71. 4.13.2.2 City of Goleta Traffic Model

Page 4.13-62 refers to Appendix 4.13-1 for land use and roadway improvements. No land use data or roadway improvement information was provided in Appendix 4.13.1. Please provide detail land use assumptions for review.
(Page 4.13-62, Public Works)

TRANS Comment #72. 4.13.2.2 Year 2025 City and County Land Uses

Paragraph One: “Several land use categories contained in the model...” This sentence states that several land use categories were omitted due to negligible changes under different scenarios. This information should be disclosed in a tabular format consistent with CEQA.
(Page 4.13-63, Public Works)
TRANS Comment #73.  4.13.2.2 Year 2025 City and County Land Uses

Paragraph Two: “Since funding for the majority of the roadway improvements is uncertain (i.e., full funding has not yet been identified), traffic forecasts and LOS results were developed assuming only the existing roadway network was present.” This approach is not acceptable considering the County and the City of Goleta have identified and approved improvements for the planning area that we are currently collecting AB1600 fees to construct. The LRDP analysis must assume these improvements as part of the baseline conditions to be consistent with County and City of Goleta Community Plans. The assumption that the infrastructure will never be built is completely unfounded and minimizes the impacts of the LRDP to the surrounding infrastructure, as infrastructure that is already compromised is slated for improvements. The County and City of Goleta have adopted plans and improvements that will maintain LOS C conditions within Goleta planning area under build out conditions.

(Please 4.13-63, Public Works)

TRANS Comment #74.  4.13.2.2 Year 2025 City and County Land Uses

Bullet One: This bullet should be revised to reflect the implementation of the approved GTIP improvements.

(Please 4.13-63, Public Works)

TRANS Comment #75.  4.13.2.2 Year 2025 City and County Land Uses

Bullet Two: This bullet, and the associated analysis, should be revised to reflect the impacts of the 2008 LRDP on transportation with and without the widening of Hwy 101 to 6 lanes. Though the 6-lane project is identified in the SBCAG 2004 MTP, it is unapproved and unfunded. Therefore, the UCSB may not associate this project as part of baseline conditions when impacts to traffic are assessed.

(Please 4.13-63, Public Works)

TRANS Comment #76.  4.13.2.2 Analytical Method

The list of proposed LRDP roadway improvements is internally inconsistent regarding how proposed improvements to El Colegio Rd. are treated. The summary on page 4.13-61 suggests El Colegio Rd. is assumed improved from Los Cameros Rd. to Stadium Rd.; however on page 4.13-63 the DEIR states improvements to Camino Del Sur are assumed. As yet, no funding source for improvements to El Colegio west of Los Cameros has been finalized. UCSB impacts to this section of roadway/intersections, assuming existing conditions, should be determined.

(Please 4.13-61 and 63; RDA)

TRANS Comment #77.  4.13.2.2 LRDP Traffic Model Scenarios

Paragraph One: This paragraph references that intersection, freeway and roadway forecasts were developed for the first four scenarios. Scenario five was only analyzed for VMT. It does not seem reasonable to omit the intersection, freeway and roadway forecasts from scenario five since the production trips would now be moved outside the UCSB campus boundaries. Therefore, there would be a net increase in vehicle trips to the local intersections as faculty and students that would have otherwise lived on campus, are now forced to commute to campus. The elimination of this analysis would reduce the impacts of the LRDP to the surrounding infrastructure. The analysis should be updated to reflect intersection, freeway and roadway operations under scenario five.

(Please 4.13-65, Public Works)
TRANS Comment #78.  4.13.2.2 LRDP Traffic Modeling Scenarios

Many forecasted turning movement volumes for all scenarios illustrated on Figure 4.13-8 through 4.13-11 do not appear reasonable. Please explain why the southbound left turn volumes for intersection #15 are decreased by 110 vehicles from 2025 NP to 2025 LRDP conditions. Also, please explain why the westbound volumes for intersection #34 are decreased from the existing condition to 2025 No Project conditions.
(Page 4.13-65, Public Works)

TRANS Comment #79.  4.13.2.2 LRDP Traffic Model Scenarios

All of these figures omit AM peak hour data. The figures should be updated to show AM peak hour operations under the various scenarios.

TRANS Comment #80.  4.13.2.2 LRDP Traffic Model Scenarios

The tables contained on these pages are unclear since they do not show the project specific trip contributions to the intersections under each scenario without referring back to the data. The figures should be revised to show the net increase or decrease in trips under each scenario as well as total volume.
(Page 4.13-66 to 4.13-73, Public Works)

TRANS Comment #81.  4.13.2.2 Analytical Method

Page 4.13-61 indicates that the City of Goleta traffic model forecasts PM peak hour volumes for Year 2030. There is no further discussion with how the AM peak hour forecasts have been generated. Detail modeling data and methodology for both AM and PM peak hour forecasts should be provided. Although City of Goleta traffic model documentation is available, the land use data, the zone structure and the highway network have been updated/modified for the UCSB LRDP project. Information on the approach to and extent of modeling inputs should be furnished to insure that model updates have been properly made.

The City of Goleta Traffic model provides only peak hour traffic volumes on roadway links, while intersection turning movements are required to evaluate traffic level of service. The methodology for transforming link volumes into intersection turning movements should be identified and documented. Some methodologies may inappropriately reduce traffic volumes during the process of preparing turning movement forecasts. Also, the process of refining the peak hour link forecasts to address local inconsistencies and anomalies in the forecast should be indicated.

It is indicated that Year 2025 traffic forecasts were developed by addition of traffic growth between the base year and Year 2025 models to existing traffic counts for the study facilities. Please provide the detail post-processing worksheets for review. The methodology may not apply to future new intersections and/or locations which experience significant roadway circulation changes.
(Page 4.13-68, Public Works)

TRANS Comment #82.  4.13.2.2 Analytical Method

The focus of the Draft EIR is an analysis of the relative changes in traffic associated with changes in campus development associated with the proposed LRDP. This is perhaps appropriate for
identification of the incremental impacts of the changes proposed by the LRDP, however it will mask
the additional impacts of development of the campus permitted under the existing LRDP. The impacts
of a development, per CEQA should not be reduced by dividing the project into phases and analyzing
the incremental development of each phase, especially when a large amount of development is
identified by the current plan. At minimum, additional traffic resulting from the existing LRDP should be
included in the assessment of cumulative impacts and the relative contribution of UCSB to cumulative
traffic growth in the area.

This distinction is most important in assessing the obligation to mitigate cumulative impacts. The LRDP
EIR may conclude that traffic expected from changes in the LRDP might constitute, say, 30% of the net
traffic increase at a specific intersection. However traffic increases associated with the existing LRDP
and its proposed land uses may contribute another 40% of the net traffic increase, resulting in a total
contribution by the LRDP (existing plus proposed) of 70% of the total impact. If UCSB related traffic
constitutes 70% of the increase, it is not appropriate to conclude that the improvement should be
provided by others and UCSB’s contribution should be limited to the 30% increase identified by the
proposed LRDP. This issue could greatly increase the responsibility of UCSB to participate or lead
traffic mitigation efforts.

Intersections in or near the campus are highly affected by this issue. The traffic analysis shows minor
contributions to total traffic increases at locations such as Los Carneros Road at Phelps/Mesa Road,
however virtually all traffic increase at this intersection would be attributed to UCSB campus growth.
(Page 4.13-68, Public Works)

TRANS Comment #83. 4.13.2.2 City of Goleta Traffic Model

The last paragraph of Page 4.13-68 indicates that Year 2025 traffic forecasts were developed by
adding the growth between the base year and Year 2025 models to existing traffic counts for the study
facilities. Please provide the detail post-processing worksheets for review. The methodology may not
apply to future new intersections and/or locations which may experience significant roadway circulation
changes.
(Page 4.13-68, Public Works)

TRANS Comment #84. 4.13.2.2 PM Peak Hour LOS Results

Paragraph One: Table 4.13-34 is referenced, but is not included in the document. Please include this
table in the revised document.
(Page 4.13-74, Public Works)

TRANS Comment #85. 4.13.2.2 Analytical Method

PM Peak Hour LOS Results: This section of the document omits a presentation of LOS results and
discussion for the Isla Vista (County of Santa Barbara) intersections.
(Page 4.13-74, Public Works)

TRANS Comment #86. 4.13.2.2 City of Goleta Intersections

Table 4.13-33, under 2025 no conditions, shows substandard levels of service at the regional
intersections. This is not true since the City and the County have approved infrastructure improvement
programs and are currently collecting fees for improvements to raise the LOS at these intersections
and roadways. This table misrepresents the LRDP impacts to the surrounding infrastructure since it
does not take in to account the baseline improvements approved in the Goleta Transportation

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Improvement Plan (GTIP). This table should be revised to reflect implementation of the approved GTIP improvements as a baseline for the projects proposed at the 2025 transportation scenario.  
(Page 4.13-75, Public Works)

**TRANS Comment #87.  4.13.2.2 Santa Barbara County Intersections**

**Bullet One**: Mesa Road/Los Carneros Road is stated to operate at LOS E under 2025 conditions. The County GTIP identifies this intersection to operate at LOS C or better with the implementation of the GTIP improvement. This bullet should be revised to reflect a revised LOS under 2025 assuming completion of the Mesa Road/Los Carneros Road GTIP project.  
(Page 4.13-78, Public Works)

**TRANS Comment #88.  4.13.2.3 Impacts and Mitigation Measures**

The DEIR proposes the payment of the University’s fair share of the cost of improvements to mitigate impacts to traffic in the County of Santa Barbara. However, the DEIR fails to provide estimated fair-share calculations based on quantifiable traffic volume contributions. Additionally, cost estimates for foreseeable intersection improvements are also missing from the report. The cost of improvements and a proposed fair share agreement and payment should be assessed and disclosed as part of the mitigation proposed in the DEIR.  
(Page 4.13-591, Public Works)

**TRANS Comment #89.  4.13.2.3 2008 LRDP Impacts and Mitigation Measures**

This section provides discussions of mitigation measures that do not discuss consequences of not meeting proposed goals and do not propose any specific monitoring to ensure adequate mitigation. The document attempts to leave it up to the University of California to determine which, if any, fees it will pay for transportation mitigation measures. The document should specify specific impacts to off-campus transportation facilities and propose specific mitigation measures that could range from directly mitigating the impact to paying fees to a regional transportation improvement plan so the University is paying its fair share to improve a transportation facility.  

**TRANS Comment #90.  LRDP Mitigation TRAFFIC-1A**

“Enhance and promote existing TDM measures” are notable goals. However, the conclusion of a 10% overall reduction as identified in this mitigation cannot be supported. The mitigation is speculative and must commit specific financial resources on a specific timeline by specific entities responsible for the successful implementation.  
(Page 4.13-91, Public Works)

**Alternative Mitigation Measure that is Adequate and Feasible**

Mitigation should contain at least the following parameters to gauge potential success. Sample Mitigation: Given past documented performance of the existing TAP program, funds will be expended on an annual basis by department[s] on the following specific TDM elements: Subsidized transit passes, car share vehicles, bicycle facilities, etc.
TRANS Comment #91. LRDP Mitigation TRAFFIC-1A

It is inadequate to propose specific mitigation of adverse impacts through a future study/work effort. The proposal to “work with” outside jurisdictions is vague and the value of mitigation against adverse impacts cannot be evaluated or quantified. The mitigation must contain specific milestones related to funding levels, timelines and specific transit programs.

(Page 4.13-92, Public Works)

TRANS Comment #92. LRDP Mitigation TRAFFIC-1A

The reference to “alternative transportation enhancements” is vague and the value of mitigation against adverse impacts cannot be evaluated or quantified. The mitigation is vague and must contain specific milestones related to funding levels, timelines and specific transit projects.

(Page 4.13-92, Public Works)

TRANS Comment #93. 4.13.2.3 LRDP Mitigation Traffic-1A

This mitigation measure proposes monitoring every three years. This timeframe is inadequate to accurately enforce monitoring. Annual monitoring should be provided or at a minimum, it should be consistent with SBCAG CMP monitoring policies.

(Page 4.13-92, Public Works)

TRANS Comment #94. 4.13.2.3 LRDP Mitigation Traffic-1A

“Contribution will include one or more of the following…” This should be modified to read “Contribution will include all of the following…”

(Page 4.13-92, Public Works)

TRANS Comment #95. 4.13.2.3 Mitigation Measures

The mitigation numbering is erratic. Please adjust the numbering to be numerically ascending.

(Page 4.13-93 to 99, Public Works)

TRANS Comment #96. 4.13.2.3 Mitigation Measures

Mitigation Measure 3: This mitigation references “Continue to pursue the potential roadway connections…” as mitigation. This is not a mitigation measure. UCSB should either build or not build the connections as part of the LRDP. This is an open ended mitigation that proposes no guarantees for completion.

(Page 4.13-95, Public Works)

TRANS Comment #97. 4.13.2.3 Mitigation Measures

Mitigation Measure 4: Although the monitoring program is suggested, it does not ensure a measurable reduction in the transportation impacts associated with the LRDP. Please provided a reasonable mitigation measure that demonstrates a measurable reduction in vehicle trips to the roadway network.

(Page 4.13-95, Public Works)

TRANS Comment #98. 4.13.2.3 Mitigation Measures

Mitigation Measure 5: This is an open ended mitigation measure that does not provide a measurable reduction in vehicle trips to the roadway network. UCSB should “build or provide” a mitigation measure
that will clearly demonstrate vehicle reductions. The mitigation measure should be revised to be more specific rather than “work with”.

(Page 4.13-95, Public Works)

**TRANS Comment #99. 4.13.2.3 Mitigation Measures**

Mitigation Measure 6: UCSB shall provide its fair share payment to all project specific impacts. It is neither County nor City policy to take a “balanced transportation system” into account when dealing with infrastructure improvements. However, in areas with multiple mode choice impacts (i.e. bike, pedestrian and vehicle conflicts), the County will consider improvements that offer an effective solution for all travel modes, provided roadway operations meet the County minimum LOS standard.

(Page 4.13-95, Public Works)

**TRANS Comment #100. 4.13.2.3 Mitigation Measures**

Mitigation Measure 6: The UCSB LRDP does not assume the completion of the City of Goleta’s GTIP roadway improvements. This assumption misrepresents the LRDP impacts to the local roadways since implementation of the improvements maintains LOS C operations under 2025 conditions. The LRDP DEIR should be revised to reflect completion of these approved improvements under the 2025 scenario.

(Page 4.13-95, Public Works)

**TRANS Comment #101. 4.13.2.3 Mitigation Measures**

Table 4.13-42 through Table 4.14-45 documented the intersection analysis results under the With Mitigation conditions. However, those improvements are not included in the bullet lists on Page 4.13-96 through Page 4.13-97. Please list mitigation measures for each intersection and illustrate the improvements graphically.

(Page 4.13-96, Public Works)

**TRANS Comment #102. 4.13.2.3 Mitigation Measures**

**Bullet 3:** The proposed mitigation provides LOS D operations at the Hollister/Los Carneros intersection. The County and City of Goleta acceptable LOS for intersections is LOS C. Please provide proper mitigation to meet the LOS standards for the applicable jurisdiction.

(Page 4.13-97, Public Works)

**TRANS Comment #103. 4.13.2.3 Mitigation Measures**

Mitigation 8: The LRDP identifies intersections that are below LOS C under the 2025 scenario. These numbers do not appear to reflect the implementation of the County and City GTIP improvements. Because these improvements are included in approved documents, they should be assumed in place and functional under the 2025 scenario, regardless of funding. Please revise this paragraph to reflect LOS operations with the approved improvements.

(Page 4.13-98, Public Works)

**TRANS Comment #104. 4.13.2.3 Mitigation Measures**

Phelps Road/Storke Road: The DEIR proposes to partially mitigate the impacts to levels of service at the Hollister/Storke Intersection by widening westbound Phelps Road to contain a left, through, and right turn lanes and by constructing the Phelps/Mesa Connection to direct traffic through the Storke
Wetlands to connect at Los Carneros. The DEIR claims that these improvements would “also improve peak hour operations” to a level lower than Year 2025 no project conditions. This connection has been contemplated by the County in the adopted GTIP, but the design and construction of the connection and widening would be the responsibility of the City of Goleta, as the proposed improvements lie within the incorporated city limit.

Though the Phelps widening and connection project has been considered in past, it has not been analyzed for environmental impacts by UCSB or the DEIR. It is reasonable to assume that the significant impacts of the proposed Phelps improvements may have prohibitive impacts on air quality, traffic volumes, wetland habitat, noise, land use, and neighborhood compatibility aesthetics, which would be disclosed in environmental review of the project. Without adequate study, analysis and disclosure of the feasibility of the Phelps Road improvements and all environmental impacts, the widening and connection project does not adequately mitigate the impacts of the 2008 LRDP on local roads serving residential development on Phelps Road.

(Page 4.13-99, OLRP)

Alternative Mitigation Measure that is Adequate and Feasible

The DEIR should analyze the impacts to biological resources, aesthetics, alternative transportation, noise, and air quality resulting from the proposed widening and connection of Phelps Rd. to Mesa Rd as part of the DEIR. Adequate alternatives should be developed that would alleviate existing and future impacts to traffic levels of service.

TRANS Comment #105. 4.13.2.3 Mitigation Measures

Mitigation 1: Hollister Avenue/Storke Road; The EIR reflects LOS E operations at this intersection under the 2025 scenario. This assumes the approved GTIP improvements are not in place. Please revise this paragraph to reflect LOS operations with the approved improvements. The approved County and City standard is LOS C.

(Page 4.13-99, Public Works)

TRANS Comment #106. LRDP Mitigation TRAFFIC-1A

Item 5: Should add City of Santa Barbara to the participating agencies to the existence of the Airport and the regional nature of bus lines utilized by UCSB.

(Page 4.13-95, Public Works)

TRANS Comment #107. 4.13.2.3 Mitigation Measures

Tables 4.13-42 and 43: The tables provided misrepresent the impacts of the LRDP since the 2025 No Project scenario does not take in to account the approved County and City GTIP improvements. Please revise these tables to reflect LOS operations with the approved improvements.

(Page 4.13-101, Public Works)

TRANS Comment #108. 4.13.2 Impacts and Mitigation Measures

The DEIR identifies an impact to Camino Del Sur south of El Colegio roadway intersection; however, mitigation measures are not clearly indicated in the DEIR. Mitigation measures must be included and incorporated into the actual mitigation, not the supporting discussion as done in the DEIR.

(Page 4.13-101-105; RDA)
Alternative Mitigation Measure that is Adequate and Feasible

As currently written, the term “fair share” in Mitigation TRAFFIC-2 and 5 does not describe a particular level of funding, or a particular standard of improvement. The DEIR should determine UCSB mitigation contributions, or describe a formula whereby such contributions will be determined. LRDP Mitigation TRAFFIC-2A 1-6 should be modified to include the additional mitigation not clearly identified in the supporting discussion. If they are not clearly identified, then they can not be considered as mitigations to reduce an impact to a less than significant level. The proposed mitigation measures should be revised to identify additional feasible mitigation measures to reduce this impact to acceptable levels.

TRANS Comment #109. 4.13.2.3 LRDP Mitigation TRAFFIC-2A

LRDP Mitigation Traffic-2A, (1): The proposed mitigation is unacceptable. This mitigation measure does not provide a measurable and definable reduction in the significance of the impacts to a less than significant level. The mitigation measure should be refined to provide a specific project that demonstrates a quantifiable reduction in vehicle trips to identified intersections that is backed by a documented analytical methodology.
(Page 4.13-102, Public Works)

TRANS Comment #110. 4.13.2.3 LRDP Mitigation TRAFFIC-2A

LRDP Mitigation Traffic-2A, (2): This mitigation measure does not clearly define a target LOS for the campus intersections. The Mitigation measure should be revised to reference the adopted LOS standard for intersection operations on campus.
(Page 4.13-102, Public Works)

TRANS Comment #111. 4.13.2.3 LRDP Mitigation TRAFFIC-2A

LRDP Mitigation Traffic-2A, (3): The proposed mitigation is inadequate. This mitigation measure is only valid if it is built. The mitigation measure should be revised to clearly reflect a proposed improvement. Coordination with another jurisdiction does not provide a measurable and definable reduction in the significance of impacts to a less than significant level.
(Page 4.13-102, Public Works)

TRANS Comment #112. 4.13.2 Impacts and Mitigation Measures

Mitigation Measure Traffic 2A is inadequate as it does not provide a monitoring program to ensure the mitigations effectively retain acceptable levels of service on local roadways.
(Page 4.13-102, Public Works)

Alternative Mitigation Measure that is Adequate and Feasible

Mitigation TRAFFIC-2A (4) should be revised to require monitoring of traffic volumes and levels of service and provide traffic monitoring data to the public within 30 days of receipt by UCSB. The DEIR should provide a monitoring program, including disclosure of traffic volumes existing and anticipated during each phase of the 2008 LRDP implementation, and mitigation payments to ensure effectiveness in mitigating impacts to local roadways. The mitigation measure should be refined to mandate monitoring every year, or at a minimum, at a schedule consistent with County CMP monitoring. Monitoring alone does not provide a measurable and definable reduction in the significance of impacts to a less than significant level.
TRANS Comment #113. 4.13.2.3 LRDP Mitigation TRAFFIC-2A

LRDP Mitigation Traffic-2A, (5): The proposed mitigation is unacceptable. This mitigation measure is only valid if it is built. The mitigation measure should be revised to clearly reflect a proposed improvement. Coordination with another jurisdiction does not provide a measurable and definable reduction in the significance of impacts to a less than significant level.

(Page 4.13-102, Public Works)

TRANS Comment #114. LRDP Mitigation TRAFFIC-2A

“Enhance and promote existing TDM measures” are notable goals. However, the conclusion of a 10% overall reduction as identified in this mitigation cannot be supported. The mitigation is speculative and must commit specific financial resources on a specific timeline by specific entities responsible for the implementation.

(Page 4.13-102, Public Works)

Alternative Mitigation Measure that is Adequate and Feasible

Mitigation should contain at least the following parameters to gauge potential success: Given past documented performance of the existing TAP program, funds will be expended on an annual basis by department[s] on the following specific TDM elements: Subsidized transit passes, car share vehicles, bicycle facilities, etc.

TRANS Comment #115. LRDP Mitigation TRAFFIC-2A

It is inadequate to propose specific mitigation of adverse impacts through a future study/work effort. The proposal to “work with” outside jurisdictions is vague and the value of mitigation against adverse impacts cannot be evaluated or quantified. The mitigation must contain specific milestones related to funding levels, timelines and specific transit programs.

(Page 4.13-102, Public Works)

TRANS Comment #116. LRDP Mitigation TRAFFIC-2A

The reference to “alternative transportation enhancements” is vague and the value of mitigation against adverse impacts cannot be evaluated or quantified. The mitigation must contain specific milestones related to funding levels, timelines and specific transit projects.

(Page 4.13-103, Public Works)

TRANS Comment #117. 4.13.2.3 LRDP Mitigation TRAFFIC-2A

“Contribution will include...” This mitigation measure should be revised to state “Contribution will include the following, but is not limited to:”

(Page 4.13-103, Public Works)

TRANS Comment #118. 4.13.2.3 LRDP Mitigation TRAFFIC-2A

Last Paragraph: The DEIR states impacts were addressed on the existing roadway network plus the widening of EL Colegio between Los Carneros Road and Stadium Road. The County and City of Goleta both have approved infrastructure plans that should be reflected in the 2025 scenario. Please update this paragraph to include the approved projects.

(Page 4.13-103, Public Works)
TRANS Comment #119. LRDP Mitigation TRAFFIC-2A

Mitigation Measures Item 2: It is difficult to evaluate the effectiveness of the proposed mitigation because it is unexplained how the improvements will improve connectivity and guarantee reasonable use by UCSB students, faculty, and staff.
(Page 4.13-104, Public Works)

TRANS Comment #120. 4.13.2.3 LRDP Mitigation TRAFFIC-2A

Bullet One and Two: Both bullets reference significant impacts with no reference to the LOS, actual impact or a mitigation measure to reduce the impacts to a less than significant level. The bullets should be revised to reflect the above referenced items to make the impacts and mitigation measures it more apparent to the reader.
(Page 4.13-104, Public Works)

TRANS Comment #121. 4.13.2.3 Mitigation Measures

Mitigation Measure 1: The proposed mitigation is unacceptable. This mitigation measure does not provide a measurable and definable reduction in the significance of the impacts to a less than significant level. The mitigation measure should be refined to provide a specific project that demonstrates a quantifiable reduction in vehicle trips to identified intersections that is backed by a documented analytical methodology.
(Page 4.13-104, Public Works)

TRANS Comment #122. 4.13.2.3 Mitigation Measures

Mitigation Measure 2: The proposed mitigation may be acceptable. This mitigation measure does not provide a measurable and definable reduction in the significance of the impacts to a less than significant level. The mitigation measure should be refined to provide a specific project that demonstrates a quantifiable reduction in vehicle trips to identified intersections that is backed by a documented analytical methodology.
(Page 4.13-104, Public Works)

TRANS Comment #123. 4.13.2.3 Mitigation Measures

Mitigation Measure 3: The proposed mitigation is unacceptable. This mitigation measure is only valid if it is built. The mitigation measure should be revised to clearly reflect a proposed improvement. Coordination with another jurisdiction does not provide a measurable and definable reduction in the significance of impacts to a less than significant level.
(Page 4.13-104, Public Works)

TRANS Comment #124. LRDP Mitigation TRAFFIC-2A

Item 5: The mitigation fails to identify who will determine “appropriate transportation facilities.” An actual investment in specific transit projects would be required to provide for measurable transit mitigation. As written, any conclusion of mitigation for adverse impacts is speculative.
(Page 4.13-105, Public Works)
TRANS Comment #125. 4.13.2.3 Mitigation Measures

Mitigation Measure 4: The proposed mitigation is unacceptable. Monitoring alone does not provide a measurable and definable reduction in the significance of impacts to a less than significant level. (Page 4.13-105, Public Works)

TRANS Comment #126. 4.13.2.3 Mitigation Measures

Mitigation Measure 5: The proposed mitigation is unacceptable. Coordination with another jurisdiction does not provide a measurable and definable reduction in the significance of impacts to a less than significant level. (Page 4.13-105, Public Works)

TRANS Comment #127. 4.13.2.3 Mitigation Measures

Mitigation Measure 6: UCSB shall provide its fair share payment to all project specific impacts. It is neither County nor City policy to take a “balanced transportation system” into account when dealing with infrastructure improvements. However, in areas with multiple mode choice impacts (i.e. bike, pedestrian, transit and vehicle conflicts), the County will look at improvements that offer the best solution for all travel modes provided that vehicle operations meet the County minimum LOS C standard. (Page 4.13-105, Public Works)

TRANS Comment #128. 4.13.2.3 Mitigation Measures

Bullet One: This mitigation measure does not consider the approved GTIP improvement for this intersection. Additionally, this bullet should be revised to reflect the approved GTIP improvement and its effects on the intersection operation. (Page 4.13-105, Public Works)

TRANS Comment #129. 4.13.2.3 Mitigation Measures

Table 4.13-44: The 2025 No project LOS column does not reflect implementation of the County and City approved GTIP improvements. Please revise. (Page 4.13-106, Public Works)

TRANS Comment #130. 4.13.2.3 Mitigation Measures

Bullet 3: The County LOS standard is “C”. This bullet identifies operations to be less than significant at LOS “D” and would therefore be unacceptable mitigation. An alternative mitigation measure should be crafted that provides a measurable and definable reduction in the significance of impacts to a less than significant level (LOS C). (Page 4.13-107, Public Works)

TRANS Comment #131. LRDP Mitigation TRAFFIC-3A

The County appreciates UCSB’s commitment to existing and future users of alternative transportation in that “roadway improvements shall not conflict with existing or planned pedestrian and bicycle facilities or degrade mobility for pedestrians and bicyclists traveling on campus.” (Page 4.13-107, Public Works)
TRANS Comment #132. LRDP Mitigation TRAFFIC-4A

“Enhance and promote existing TDM measures” are notable goals. However, the conclusion of a 10% overall reduction as identified in this mitigation cannot be supported. The mitigation is speculative and must commit specific financial resources on a specific timeline by specific entities responsible for the implementation.
(Page 4.13-110, Public Works)

Alternative Mitigation Measure that is Adequate and Feasible

Mitigation should contain at least the following parameters to gauge potential success: Given past documented performance of the existing TAP program, funds will be expended on an annual basis by department[s] on the following specific TDM elements: Subsidized transit passes, car share vehicles, bicycle facilities, etc.

TRANS Comment #133. LRDP Mitigation TRAFFIC-4A

It is inadequate to propose specific mitigation of adverse impacts through a future study/work effort. The proposal to “work with” outside jurisdictions is vague and the value of mitigation against adverse impacts cannot be evaluated or quantified. The mitigation must contain specific milestones related to funding levels, timelines and specific transit programs.
(Page 4.13-111, Public Works)

TRANS Comment #134. LRDP Mitigation TRAFFIC-4A

The reference to “alternative transportation enhancements” is vague and the value of mitigation against adverse impacts cannot be evaluated or quantified. The mitigation is vague and must contain specific milestones related to funding levels, timelines and specific transit projects.
(Page 4.13-112, Public Works)

TRANS Comment #135. LRDP Mitigation TRAFFIC-5A

“Enhance and promote existing TDM measures” are notable goals. However, the conclusion of a 10% overall reduction as identified in this mitigation cannot be supported. The mitigation is speculative and must commit specific financial resources on a specific timeline by specific entities responsible for the implementation.
(Page 4.13-116, Public Works)

Alternative Mitigation Measure that is Adequate and Feasible

Mitigation should contain at least the following parameters to gauge potential success. Given past documented performance of the existing TAP program, funds will be expended on an annual basis by department[s] on the following specific TDM elements: Subsidized transit passes, car share vehicles, bicycle facilities, etc.

TRANS Comment #136. 4.13.2.3 Mitigation Measures

Table 4.13-46: The v/c ratios provided are erroneously calculated using the LOS C threshold criteria. The table and associated impacts should be revised to calculate v/c values based on approved roadway design capacities.
(Page 4.13-115, Public Works)
TRANS Comment #137.  4.13.2.3 Mitigation Measures

Mitigation Measure 1: The proposed mitigation is unacceptable. This mitigation measure does not provide a measurable and definable reduction in the significance of the impacts to a less than significant level. The mitigation measure should be refined to provide a specific project that demonstrates a quantifiable reduction in vehicle trips to identified intersections that is backed by a documented analytical methodology.

(Please provide page number and reference)

TRANS Comment #138. LRDP Mitigation TRAFFIC-5A

It is inadequate to propose specific mitigation of adverse impacts through a future study/work effort. The proposal to “work with” outside jurisdictions is vague and the value of mitigation against adverse impacts cannot be evaluated or quantified. The mitigation must contain specific milestones related to funding levels, timelines and specific transit programs.

(Please provide page number and reference)

TRANS Comment #139.  4.13.2.3 Mitigation Measures

Mitigation Measure 2: The proposed mitigation may be acceptable. This mitigation measure does not provide a measurable and definable reduction in the significance of the impacts to a less than significant level. The mitigation measure should be refined to provide a specific project that demonstrates a quantifiable reduction in vehicle trips to identified intersections that is backed by a documented analytical methodology.

(Please provide page number and reference)

TRANS Comment #140.  4.13.2.3 Mitigation Measures

Mitigation Measure 3: The proposed mitigation is unacceptable. This mitigation measure is only valid if it is built. The mitigation measure should be revised to clearly reflect a project or be removed entirely as mitigation. Coordination with another jurisdiction does not provide a measurable and definable reduction in the significance of impacts to a less than significant level.

(Please provide page number and reference)

TRANS Comment #141.  4.13.2.3 Mitigation Measures

Mitigation Measure 4: The proposed mitigation is unacceptable. Monitoring alone does not provide a measurable and definable reduction in the significance of impacts to a less than significant level.

(Please provide page number and reference)

TRANS Comment #142.  4.13.2.3 Mitigation Measures

Mitigation Measure 5: The proposed mitigation is unacceptable. Coordination with another jurisdiction does not provide a measurable and definable reduction in the significance of impacts to a less than significant level.

(Please provide page number and reference)
TRANS Comment #143. LRDP Mitigation TRAFFIC-5A

The reference to “alternative transportation enhancements” is vague and the value of mitigation against adverse impacts cannot be evaluated or quantified. The mitigation is vague and must contain specific milestones related to funding levels, timelines and specific transit projects.
(Page 4.13-117, Public Works)

TRANS Comment #144. 4.13.2.3 Mitigation Measures

Mitigation Measure 6: UCSB shall provide its fair share payment to all project specific impacts. It is neither County nor City policy to take a “balanced transportation system” into account when dealing with infrastructure improvements. However, in areas with multiple mode choice impacts (i.e. bike, pedestrian, transit and vehicle conflicts), the County will look at improvements that offer the best solution for all travel modes provided that vehicle operations meet the County minimum LOS C standard.
(Page 4.13-117, Public Works)

TRANS Comment #145. 4.13.2.3 Mitigation Measures

“Contribution will include...” This mitigation measure should be revised to state “Contribution will include the following, but is not limited to:"
(Page 4.13-117, Public Works)

TRANS Comment #146. 4.13.2.3 Mitigation Measures

Mitigation Measure 1: The proposed mitigation is unacceptable. This mitigation measure does not provide a measurable and definable reduction in the significance of the impacts to a less than significant level. The mitigation measure should be refined to provide a specific project that demonstrates a quantifiable reduction in vehicle trips to identified intersections that is backed by a documented analytical methodology.
(Page 4.13-118, Public Works)

TRANS Comment #147. 4.13.2.3 Mitigation Measures

Mitigation Measure 2: The proposed mitigation may be acceptable. This mitigation measure does not provide a measurable and definable reduction in the significance of the impacts to a less than significant level. The mitigation measure should be refined to provide a specific project that demonstrates a quantifiable reduction in vehicle trips to identified intersections that is backed by a documented analytical methodology.
(Page 4.13-118, Public Works)

TRANS Comment #148. 4.13.2.3 Mitigation Measures

Mitigation Measure 3: The proposed mitigation is unacceptable. This mitigation measure is only valid if it is built. The mitigation measure should be revised to clearly reflect a project or be removed entirely as mitigation. Coordination with another jurisdiction does not provide a measurable and definable reduction in the significance of impacts to a less than significant level.
(Page 4.13-119, Public Works)
TRANS Comment #149.  4.13.2.3 Mitigation Measures

Mitigation Measure 4: The proposed mitigation is unacceptable. Monitoring alone does not provide a measurable and definable reduction in the significance of impacts to a less than significant level.
(Page 4.13-119, Public Works)

TRANS Comment #150.  4.13.2.3 Mitigation Measures

Mitigation Measure 5: The proposed mitigation is unacceptable. Coordination with another jurisdiction does not provide a measurable and definable reduction in the significance of impacts to a less than significant level.
(Page 4.13-119, Public Works)

TRANS Comment #151.  4.13.2.3 Mitigation Measures

Mitigation Measure 6: UCSB shall provide its fair share payment to all project specific impacts. It is neither County nor City policy to take a “balanced transportation system” into account when dealing with infrastructure improvements. However, in areas with multiple mode choice impacts (i.e. bike, pedestrian, transit and vehicle conflicts), the County will look at improvements that offer the best solution for all travel modes provided that vehicle operations meet the County minimum LOS C standard.
(Page 4.13-119, Public Works)

TRANS Comment #152. LRDP Mitigation TRAFFIC-6A

"Enhance and promote existing TDM measures" are notable goals. However, the conclusion of a 10% overall reduction as identified in this mitigation cannot be supported. The mitigation is speculative and must commit specific financial resources on a specific timeline by specific entities responsible for the implementation.
(Page 4.13-121, Public Works)

Alternative Mitigation Measure that is Adequate and Feasible

Mitigation should contain at least the following parameters to gauge potential success. Given past documented performance of the existing TAP program, funds will be expended on an annual basis by department[s] on the following specific TDM elements: Subsidized transit passes, car share vehicles, bicycle facilities, etc.

TRANS Comment #153. LRDP Mitigation TRAFFIC-6A

It is inadequate to propose specific mitigation of adverse impacts through a future study/work effort. The proposal to “work with” outside jurisdictions is vague and the value of mitigation against adverse impacts cannot be evaluated or quantified. The mitigation must contain specific milestones related to funding levels, timelines and specific transit programs.
(Page 4.13-121, Public Works)
TRANS Comment #154. LRDP Mitigation TRAFFIC-6A

The reference to “alternative transportation enhancements” is vague and the value of mitigation against adverse impacts cannot be evaluated or quantified. The mitigation is vague and must contain specific milestones related to funding levels, timelines and specific transit projects.
(Page 4.13-122, Public Works)

TRANS Comment #155. LRDP Mitigation TRAFFIC-8A

It is inadequate to propose specific mitigation of adverse impacts through a future study/work effort. The proposal to “work with” outside jurisdictions is vague and the value of mitigation against adverse impacts cannot be evaluated or quantified. The mitigation must contain specific milestones related to funding levels, timelines and specific transit programs, bicycle and pedestrian projects.
(Page 4.13-130, Public Works)

TRANS Comment #156. LRDP Impact TRAFFIC-10 Isla Vista Parking Impacts

LRDP Mitigation Measure TRAFFIC-10A is inadequate. The UCSB parking survey results (Table 4.13-17 and 4.13-18) indicate approximately 1,530 faculty/staff and students are parking off-campus in Isla Vista and Goleta Beach on a daily or frequent basis. For Isla Vista, this represents 25% (885 spaces) of the on-street parking spaces are being used daily by UCSB affiliates. The DEIR acknowledges off-campus parking intrusion by UC Santa Barbara affiliates. This has historically been a concern due to the close proximity of free parking spaces in Isla Vista and at Goleta Beach.
(Page 4.13-132, OLDP)

Alternative Mitigation Measure that is Adequate and Feasible

The LRDP needs to propose specific mitigation measures such as fully accommodating the parking needs of the UCSB faculty, staff and students. The LRDP and DEIR need to discuss the specific impacts to the Isla Vista community and proposed specific mitigation measures such as building more parking spaces and reducing parking fees so using UCSB provided spaces becomes more attractive.

TRANS Comment #157. LRDP Mitigation Traffic 10A

Mitigation TRAFFIC-10A relies on UC Santa Barbara contributing its fair-share towards the implementation of a parking permit program in Isla Vista. As noted on page 4.13-133, Santa Barbara County has attempted to implement a parking permit program in Isla Vista but was unable to receive approval from the Coastal Commission. Due to the future uncertainty surrounding approval of a parking permit program in Isla Vista, the 2008 LRDP & DEIR shall disclose this issue and identify additional mitigation measures to alleviate off-campus parking intrusion in Isla Vista and at Goleta Beach associated with buildout of the LRDP.
(Page 4.13-132, OLDP, RDA)

Alternative Mitigation Measure that is Adequate and Feasible

Mitigation may include, but are not limited to prohibiting cars for freshman students residing on campus; providing free parking for UCSB Students and adding the parking fee into student fees to offset construction costs of free parking in Isla Vista, designate long term parking versus day parking lot to allow student to store their cars on-campus alleviate impacted Goleta Beach Parking in Isla Vista, or develop additional free parking spaces within UCSB and Isla Vista.

W Comment #1. 4.14.1. Environmental Setting

The legend for the water district boundary and Goleta City Limits are transposed on Figure 4.14-1 -1. Please revise accordingly.
(Pages 4.14-2; Water Agency)

W Comment #2. 4.14.1. Environmental Setting

In order to fully evaluate water supply availability, water supply and demand analysis needs to be based on both annual demand and peak daily demand. Only annual demand is used in the analysis. Please provide additional analysis based on peak daily demand.
(Pages 4.14-2 through 8; Water Agency)

W Comment #3. 4.14.1.2. Water Supplies

The nature of the “right” to receive supplies should be clarified. If the supplies are based on a contract or other agreement, that should be clarified in the DEIR.
(Page 4.14-6; Water Agency)

W Comment #4. 4.14.1.2. Water Supplies

Clarification of what “estimate of current water demand” entails should be provided. As it is currently disclosed, it appears that the discussion intends to comprise a description of baseline. The intent needs to be clarified accordingly.
(Page 4.14-7; Water Agency)

W Comment #5. 4.14.1.3 Future Water Demand

Future demand for water (in acre-feet per year AFY) is intrinsically linked to future primary and secondary population growth and the structures proposed as part of the 2008 LRDP. The DEIR reports conflicting totals of units, bedspaces, and populations totals in the document. For example, Table 3.0-9: Proposed Additional Campus Housing – Units reports an increase of 2,331 net new units and 4,205 net new bedspaces. However, Table 1.0-1: Summary of the 2008 LRDP reports and increase of 2,113 additional units and 5,443 additional bedspaces. The future water demand analysis is inadequate due to the lack of commitment by the University to a project description and a lack of a phasing plan that demonstrates the timing and intensity of the development proposed by the 2008 LRDP. This section should be revised in light of a proposed phasing plan from 2008 -2025 to disclose projections of impacts to water supply.

W Comment #6. 4.14.1.3 Future Water Demand

This analysis may not be based on a “reasonable worst case” and so requires more justification of the water duty factor selected. The analysis should consider the future water demand of the secondary growth associated with the University, which cumulatively has an impact on the availability of water to the Goleta Water District area.
(Page 4.14-13; Water Agency)
W Comment #7.  4.14.1.4 Regulatory Context

This discussion needs to disclose that water in excess of those amounts held in the name of local districts is held by Central Coast Water Authority as a drought buffer, and is therefore not available for other uses, including the University’s future needs under the 2008 LRDP. (Page 4.14-17; Water Agency)

W Comment #8.  4.14.1.5 Cumulative Setting

This section provides no discussion of reasonably foreseeable projects to be considered in the Cumulative Impacts section. In short the Cumulative Impacts section for water supply is essentially omitted. Given the importance of water supplies in Santa Barbara County and the South Coast area in particular, this DEIR must be re-circulated with the inclusion of discussion pertaining to cumulative impacts to water supply and mitigation of those impacts. (Page 4.14-18; Water Agency)

W Comment #9.  4.14.2.3 Cumulative Impacts

Impact W-3 recognizes that the proposed growth of the LRDP in conjunction with other development in the GWD service area will increase the cumulative demand for potable water so that the impact is significant. The proposed LRDP Mitigation W-3A does not specify how the University will ensure that adequate water is provided for the proposed growth, including any potential deals with outside water agencies to purchase additional water and the regional impacts of such deals. This mitigation needs to be much more specific about providing supplemental supplies to meet the increased demand driven by the LRDP. Without more specificity, this mitigation cannot be considered feasible. (Page 4.14-22; Water Agency)

Alternative Mitigation Measure that is Adequate and Feasible

In order to conclude that there would be no significant impact due to increased demand the nature of these new supplies needs to be discussed along with a determination of their feasibility. Only those supplemental supplies that are demonstrated to be feasible can be used as a basis of mitigation.

W Comment #10.  4.14.2.2 2008 LRDP Impacts and Mitigation Measures

LRDP Mitigation W-3D is inadequate in that it provides no quantifiable means to establish the effectiveness of the proposed water saving devices in the mitigation measure. (Page 4.14-23; Water Agency)

Alternative Mitigation Measure that is Adequate and Feasible

The University needs to show a schedule for retrofitting existing facilities with low flow fixtures and an estimated annual savings based on the number of fixtures to be replaced. This information is necessary to estimate the effectiveness of the mitigation measure.

W Comment #11.  4.14.2.2 2008 LRDP Impacts and Mitigation Measures

LRDP Impact W-3 and its proposed mitigations do not adequately address nor secure potable water needed to accommodate the proposed growth. The proposed mitigations do not demonstrate the availability of supplemental supplies. In addition, the proposed mitigation of conservation/retrofitting does not provide a schedule or estimate of water savings. Thus the statements regarding adequacy of supply for the LRDP are without basis. The proposed Residual Significance level is inadequate.
Alternative Mitigation Measure that is Adequate and Feasible

The proposed mitigations need to ensure that potable water for the proposed growth is secured. The mitigations should disclose the needed water entitlements to accommodate the 2008 LRDP growth.
(Page 4.14-24; Water Agency)
4.15.  Wastewater

No comment from the County of Santa Barbara, as this utility is served by Goleta Sanitary District and Goleta West Sanitary District.
4.16. Other Utilities

UT Comment #1. 4.16.1.2 Solid Waste and Recycling

The Regulatory Context discussion needs to disclose the Goleta Community Plan policies pertaining to Resource Recovery.

This section should also refer to DEIR Section 4.7 Hydrology and Water Quality in that Solid Waste and Recycling Facilities should be located appropriately distanced from waterways, covered, and that any water drainage and runoff should be treated considering potential contamination from solid waste.

UT Comment #2. 4.16.1.2 Solid Waste and Recycling

Under the Multi-Jurisdiction Solid Waste Task Group (MJSWTG) discussion, the 2008 LRDP inaccurately states the regional diversion rate to be 55%. The County is currently certified at 64% and its internal calculations place the diversion rate at 69%. The DEIR inaccurately states that the County has 18 years of capacity left at the Tajiguas Landfill. The Tajiguas Landfill actually has 14 years left. (Page 4.16-2; Public Works, Resource Recovery and Waste Management)

UT Comment #3. 4.16.1.2 Solid Waste and Recycling

At this time, 4,000 tons represents a diversion point for the County. This means that if the tons buried at the Tajiguas Landfill were to increase by 4,000 tons per year, the County’s diversion rate would decrease by 1%. Additionally, if the County’s diversion rate drops below 50%, the County could be subject to fines of $10,000 a day as well as the disappointment expressed by County residents and businesses that are actively reducing, reusing, recycling, and composting. Therefore, the 2008 LRDP and DEIR should include additional measures to ensure that a solid waste diversion rate of 75% is required as part of its growth. (Page 4.16-2; Public Works, Resource Recovery and Waste Management)

UT Comment #4. 4.16.1.2 Solid Waste and Recycling

At 54.2% diversion, UCSB is considerably lower than all neighboring jurisdictions. The University should commit to a higher diversion rate of 75% diversion rate by 2010.

The map on page 4.16-4 shows existing recycling facilities. There is no reference to new facilities in this section and it does not disclose if existing facilities have the capacity to provide for the expansion. (Page 4.16-3; Public Works, Resource Recovery and Waste Management)

UT Comment #5. 4.16.1.6 Telecommunications

Please provide a map indicating the location of the existing eight (8) cell sites and the proposed three (3) cell sites. Private cell towers are not related to the educational function of the University and therefore require permitting from the governing jurisdiction. Provide the appropriate permits for all existing and proposed cells sites. (Page 4.16-11, OLRP)

UT Comment #6. 4.16.2 Impacts and Mitigations
The Standards of Significance should use the County's existing operational and proposed construction and demolition thresholds to evaluate impacts since the University's waste is sent to the County’s Tajiguas Landfill. It is also important to note that there is no reference to solid waste impacts, diversion, or recycling in the actual 2008 LRDP. These issues are only discussed in the DEIR. The 2008 LRDP should include additional policies for diversion as a means to support the University’s goals of sustainability.


UT Comment #7. 4.16.2 Impacts and Mitigations

LRDP Impact UTIL-1 recognizes that the growth proposed in the 2008 LRDP will result in an increase in the solid waste being disposed of in the local landfills as significant. LRDP Mitigation UTIL-1A is not supported by the DEIR discussion. The analysis does not provide information pertaining to the estimated waste generation of the proposed population increase, academic space and residential units. In addition, the DEIR does not provide direction pertaining to recycling within new and redeveloped areas. It is important to note that the proposed 2008 LRDP is increasing waste generation and spreading development throughout the campus property.

(Page 4.16-14; Public Works, Resource Recovery and Waste Management)

Alternative Mitigation Measure that is Adequate and Feasible

All new construction will have to conform to AB 2176 requiring equal and adequate space provided for both solid waste and recycling in all new facilities. UCSB should manage and coordinate an integrated waste management program, to:

1) Increase UCSB solid waste diversion to 75%
2) Implement a greenwaste composting program for landscaping/vegetation management programs
3) Increase recycling facilities and programs
4) Compost food waste
5) Use recycled/recyclable materials for all University functions
6) And provide adequate facilities to support the proposed sustainability goals of the University.

Alternative Mitigation Measure that is Adequate and Feasible

The University should augment the existing recycling system to reach a diversion rate of 75%, as stated above.

UT Comment #8.

LRDP Mitigation UTIL-1B is not supported by the discussion. This analysis does not provide data pertaining to waste generated from Construction and Demolition. However, the DEIR LRDP Impact discussion for AIR-3 states the following (page 4.2-30):

- Development under the 2008 LRDP will require complete demolition of 1,065,569 square feet, plus partial removal of 106,957 square feet, of existing buildings on campus. To accommodate the growth proposed in the 2008 LRDP 1.8 million square feet of academic buildings and 3.5 million square feet of residential buildings would be constructed. Parking and street improvements would also be needed, this would include removal of 2.2 million square feet of parking, construction of 1.4 million square feet of parking, and construction of 2.3 million square feet of major roads.
This is a substantial amount of construction and demolition resulting from the proposed growth. Based on the definition of boundaries prepared by the California Integrated Waste Management Board, UCSB is currently within the jurisdiction of the County of Santa Barbara when computing if our community is in compliance with the California Integrated Waste Management Act (CIWMA). The CIWMA was passed in 1989 and requires each jurisdiction to divert from the landfill 50% of the waste generated in 1990 by the year 2000. Compliance with the CIWMA is documented through the annual preparation of a disposal report accounting for changes in population and sales tax. Subsequent revisions to the CIWMA have required that the 50% diversion rate be maintained after 2000 and there have been several recent legislative proposals to increase that diversion requirement to 75%. The last diversion rate for the County that has been certified by the state is 64% for 2004.

(Page 4.16-15; Public Works, Resource Recovery and Waste Management)

Additionally, (Second Paragraph) the reference to 18 years of disposal capacity should be changed to 14 additional years from 2008.

(Page 4.16-15; Public Works, Resource Recovery and Waste Management)

**Alternative Mitigation Measure that is Adequate and Feasible**

UCSB should develop a contract with its contracted solid waste hauler to divert all Construction and Demolition (C&D) waste to the local recycling facility.

**Alternative Mitigation Measure that is Adequate and Feasible**

UCSB should also develop a campus wide greenwaste recycling and foodwaste composting program either on campus or through its contracted solid waste hauler.

**Alternative Mitigation Measure that is Adequate and Feasible**

All campus facilities should use recycled and/or recyclable materials for all functions.

**UT Comment #9.**

The County Resource Recovery & Waste Management Division is available to assist with preparing solid waste management plan as well as identifying means of recycling on-site on a fee basis.

(Page 4.16-15; Public Works, Resource Recovery and Waste Management)
5.0 Alternatives

The EIR improperly eliminates from consideration the No Project Alternative and those reasonable alternatives that reduce environmental impacts. CEQA requires that such alternatives be included in EIRs. CEQA Guidelines Sections 15126.6(a) (e). By limiting the review of the Reduced Enrollment Alternative to six pages, the EIR is not complying with CEQA’s requirement to analyze alternatives “to substantially lessen any of the significant effects of the project. (Guidelines Sections 15126.6(a)). Despite the fact that the EIR concludes that the Reduced Enrollment Alternative is the Environmentally Superior Alternative, the EIR does not provide virtually any analysis or comparison to the proposed project impacts. Section 5.2.2.2 also contains improper circular logic in dismissing the Reduced Enrollment Alternative as feasible. First CEQA provides that an EIR must examine an alternative if it meets most of the project objectives. The only objective not met is an arbitrary number related to desired growth supplied by the lead agency itself. CEQA clearly prohibits lead agencies from using project objectives that are so narrow that they unreasonably limit the range of alternatives. That is exactly what the EIR does in this case; by relying on a fixed number (1%) that has nothing to do with the existing setting, the available infrastructure, or the surrounding community policies, the EIR has impermissibly narrowed its range of alternatives to the proposal.

The Reduced Enrollment Alternative is inadequate in that the proposed reduction does not provide support for its assumptions and does not clarify the maximum amount of students. The alternative, as it is currently worded, states that an increase of 3,000 students would reduce growth by 40%. Since the discussion does not disclose if there is a maximum enrollment, then it can be construed as an addition 3,000 students above the existing population of 21,082. The additional 3,000 students would increase the student population to 24,082, which is nearly what the LRDP & DEIR currently propose.

By limiting the review of the No Project alternative to four pages, the EIR is not complying with CEQA’s requirement to analyze the no impact alternative “to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.” CEQA Guidelines Sections 15126.6(e). For instance, by providing a skeletal analysis of the impacts of public services and blithely concluding the impacts would be significant, the EIR equates the project impacts with the no project impacts when in fact the impacts are vastly different. While UCSB impacts to County public services are large and ongoing, the increase in impacts will be an enormous increase. This comparison, which is at the heart of CEQA’s alternatives requirement, is absent.

Additionally, Table 5.0-1 shows that the plus and minus signs have the same definitions. Please revise accordingly. (Pages 5.0-5-8; Fire)

The following project alternatives should be considered:

A. Project Alternative that is Adequate and Feasible

The DEIR and 2008 LRDP should analyze the feasibility and the potential to alleviate impacts of purchasing and either retrofitting or rebuilding housing in Isla Vista for continuing students and faculty. This alternative would support redevelopment to provide housing for these currently underserved populations. It is reasonable to assume that housing provisions for continuing students, faculty and staff would alleviate many of the impacts to the environment, public services, and infrastructure
resulting from development and populations sprawling not only into undeveloped, natural, and environmentally sensitive habitat areas, but also into surrounding jurisdictions.

B. Project Alternative that is Adequate and Feasible

Under current housing allocations, only first-year students are guaranteed on-campus, UCSB-owned housing rentals. Each year, nearly an entire class of students moves into the surrounding communities. This is a growth-inducing impact of the 2008 UCSB LRDP. By providing appealing University-owned housing options for continuing students on Main Campus, Isla Vista, the City of Goleta, and the County of Santa Barbara would be less likely to house sophomore, junior, senior, and graduate students. Additionally, increasing housing opportunities for new and continuing students on Main Campus would localize growth and all associated impacts to transportation, public services, and biological resources to an area that is already used intensely. As an alternative, the DEIR and 2008 LRDP should analyze the feasibility and the potential to alleviate impacts of increasing Main Campus housing to accommodate new and continuing students, faculty and staff.
6.0 Other CEQA Considerations

CEQA Comment #1. 6.2 Growth Inducement

Growth inducing impacts of the 2008 LRDP are primary concerns for the County of Santa Barbara. As recorded in the County’s comments on DEIR Section 4.8: Land Use and Section 4.10 Population and Housing, the significant increases in population and university facilities proposed as part of the 2008 LRDP are anticipated to cause significant impacts to County infrastructure, service levels, housing, and economic development. The DEIR analysis of growth inducement in surrounding areas is in adequate because the LRDP DEIR does not:

- discuss obvious secondary impacts due to UCSB planned growth,
- include support for its conclusions that there will be sufficient on campus housing,
- include support for its conclusions that indirect impacts to infrastructure, public and community services and traffic will be less than significant, and
- identify and adopt numerous reasonable and feasible mitigation measures for the clearly foreseeable growth inducing impacts.

While the LDRP DEIR analysis concludes that the 2008 LRDP’s induced growth is a secondary or indirect impact, this same analysis contends that this secondary impact will not be significant because

1) The 2008 LRDP provides housing for all its projected growth in the form of student, faculty, and staff housing.
2) Most of the infrastructure or improvements in infrastructure under the 2008 LRDP are within the campus.
3) Off-campus improvements are limited to roadway infrastructure, proposed to mitigate the impacts of LRD implementation.

The County challenges these findings on the basis that the DEIR lacks consideration of housing options for continuing undergraduate and graduate students, housing options and availability for relatives of enrolled students augmenting the real regional population, South Coast housing market pressures and affordable housing availability for future populations, and potential roadway improvements beyond what is planned for under adopted County documents, such as the GTIP and the Capital Improvements Program (CIP). Further, the LRDP does not address the growth inducement caused by growth of the service sector due to the increased demand caused by UCSB’s substantial growth. There will be considerable increases in impacts to infrastructure and public services, community services and traffic due to the growth in the construction, retail and service businesses that will follow the increase in UCSB’s students, faculty and administrators. The following comments detail this assertion.

(Page 6.0-3, OLRP)

CEQA Comment #2. 6.2 Growth Inducement

The DEIR acknowledges that development of the 2008 LRDP would provide on-campus housing for all future students, faculty, and staff. Student enrollment is planned to increase at an average rate of 1% per year, phased as new developments and redevelopments are implemented. However, the 2008 LRDP has no proposed housing provisions for continuing students after their first year. The university housing program guarantees housing to all first-year students, but fails to accommodate students throughout their academic careers at UCSB. Based on information posted on UCSB student housing
website (http://www.housing.ucsb.edu/hchoices/wherecanilive.htm), current housing can accommodate the following:

**Freshman**
- Eight residence halls provide room and board for 4700 students.
- Most freshmen opt to live in residence halls their first year with many choosing to return for subsequent years.
- Freshmen who return a Statement of Intent to Register are eligible to complete the Residence Hall Contract.
- Some freshmen choose to live in private apartments or commute from home.

**Continuing Student**
- University-owned Undergraduate Apartments are very popular for sophomores, juniors and seniors. (Note: the LRDP does not propose modifications, increases in housing availability, or improvements to these apartments. The 290 furnished apartments for single (unmarried) full-time UCSB students are rented on an academic year basis (9-months), which means continuing students must find alternative housing during the summer months)
- Many sophomores (and some juniors and seniors) return to the university-owned residence halls.
- A lottery held February 1-15 for continuing students allocates spaces within the residence halls and apartments

The County has concerns regarding the LRDP's assessment of population and housing. In particular, the LRDP does not provide adequate discussion or mitigation for the impacts of increased populations of 'continuing undergraduates', as in sophomores, juniors and seniors. UCSB only promises to house 1st year students. Once freshmen are accommodated, a lottery for continuing undergraduates fills the remaining beds, which often insignificantly houses these students. For example, during the 2007 school year, the County is concerned about the following inadequate supply of housing for continuing students:

- In 2007, 4,338 students enrolled as freshmen.
- All freshmen are assured of residence hall housing, provided housing deadlines are met.
- According to the UCSB’s housing website, UCSB provides 4,795 beds in its residence halls.

At this rate, the residence halls can only accommodate 457 continuing undergraduate students each year. The rest (3,881 students) must find housing in Isla Vista, Goleta, or other parts of the County. This means 89.5% of sophomores in the 2008 school year were required to find off-campus housing in the County’s jurisdictions. As such, the DEIR explains that Isla Vista is home to 40% of UCSB’s student body. With the proposed increases in student population, it is reasonable to assume this percentage would increase proportionally. The 2008 LRDP does not propose to expand housing for existing or continuing students; it proposes only to accommodate increased average enrollment. This means UCSB would accommodate an increased freshmen baseline, but contribute an annually increasing number of students into Isla Vista without increased housing in the area.

Additionally, the County asserts that though students graduate each year as new freshmen enroll, which offsets UCSB total population, many graduates remain in Santa Barbara County to continue to work, live, and/or go to graduate school. The 2008 LRDP reports their population rate as a function of students enrolling and graduating each year, but should evaluate the impacts of the student who remain after graduation after having moved from other places to live in Santa Barbara County. These
populations would not occur without UCSB, and therefore arguably, UCSB is one of the largest growth-inducing businesses in the County and must be considered as such in the DEIR.

Alternative Mitigation Measure that is Adequate and Feasible

UCSB should implement either, or a combination of both, alternatives proposed by the County of Santa Barbara as part of Section 5.0 of this comment letter. These alternatives would provide additional University-owned housing for continuing students on Main Campus and in Isla Vista. These alternatives would relieve some of the burden on the County of Santa Barbara to provide housing and services to continuing students enrolled at UCSB.

CEQA Comment #3. 6.2 Growth Inducement

The DEIR claims that most infrastructure improvements proposed under the 2008 LRDP would occur on campus, with the exception of roadway improvements, which would mitigate the impacts of increased traffic on area roadways. The County contends that the improvements identified as part of the 2008 LRDP and DEIR inaccurately mitigate the impacts of growth-inducement and that more potential roadway improvements are needed beyond what is planned for under adopted County documents, such as the GTIP and the Capital Improvements Program (CIP). These plans were developed without consideration of the 2008 LRDP’s proposed growth. As such, the improvements were designed to accommodate the buildout of the County of Santa Barbara under existing land use and zoning growth assumptions. By adding additional primary and secondary populations, the County would be required to expand planned roadway improvements in number, scale, and type, as is detailed in County comments on Section 4.13: Transportation. A complete update of our transportation improvement plans would be needed in order to accommodate the significant increase in population.

Additionally, any improvements in roadways, public services, and levels of service (LOS) to accommodate primary and secondary growth from the 2008 LRDP, including the widening of primary arterials, highways, secondary streets, the increase in wastewater capacity, the increase in water availability, or the increase in emergency services response times and ranges, would have a significant growth-inducing impacts on the County as additional populations not associated with the University could use the capacity increases.

Alternative Mitigation Measure that is Adequate and Feasible

The DEIR must evaluate the impacts of increased service capacity as a catalyst for increased development and population growth beyond what is planned for in the County Comprehensive Plan.

CEQA Comment #4. 6.2 Growth Inducement

The DEIR acknowledges “induced growth can result in increased demand on community and public service infrastructure, an increase in traffic noise, degradation of air and water quality, and agricultural land conversion to urbanized uses,” which are all major concerns for the County in our baseline environmental setting. In the unincorporated areas surrounding UCSB property, the Goleta Community Plan and the County Comprehensive Plan enforce County standards for timely emergency services response times, a Level of Service (LOS) “C” at intersections and roadways, and a balance of land uses adopted as part of the plans, including residential, commercial, and urban agricultural uses. It is clear from the County’s comments on traffic, public services, water resources, and land use and planning that all of these impacts from growth inducement are major concerns for the County and are
not adequately mitigated by the DEIR. It is reasonable then that, based on the disclosed primary population increases, the secondary population growth foreseen for the Goleta Valley associated with the primary population growth of UCSB toward 2025 would not be accommodated at currently adopted County standards. These future secondary populations could expect poor emergency response times, and unacceptable LOS at intersections and associated poorer air quality.

Additionally, though development under the 2008 LRDP does not directly threaten existing agricultural resources, this section fails to acknowledge the proximity and sensitivity of adjacent urban agricultural lands in the County, known as the Patterson Agricultural Block. It is critical to evaluate the real potential for growth inducing impacts of the 2008 LRDP to generate demand for this area’s conversion to residential uses. Since the County’s comprehensive planning goals include the preservation and proliferation of agriculture, any loss of urban agricultural lands under increasing growth pressures is considered significant. Secondary population growth, consisting of students’ families and relatives, or employees, should be estimated as additional population growth associated with the 2008 LRDP and analyzed for impacts to public services, transportation, and land conversion.

CEQA Comment #5. 6.2.1 Indirect Economic Growth

The County recognizes that UCSB positively contributes to economic viability in Santa Barbara County with associated advances in industry, tourism, entertainment, technology, retail sales, and other beneficial economic activity. The economic benefit of commercial development, however, is accompanied by the responsibility of the County to implement plans to accommodate anticipated economic growth. The DEIR acknowledges that increases in jobs on the South Coast of Santa Barbara County will further exacerbate the jobs/housing imbalance if additional housing is not constructed in each jurisdiction. This is significant due to associated traffic impacts from commuters. Though the DEIR estimates 11,071 indirectly created jobs, it does not describe this total in terms regional commuter trends. For instance, the DEIR should disclose the number of employees who would commute from County areas outside the Goleta Valley and the impacts to traffic and air quality resulting from increases in this type of commuting. Additionally, the DEIR notes that the 2007 Regional Growth Forecast from the Santa Barbara County Association of Governments does “not include growth anticipated under the 2008 LRDP” in the regional growth and buildout scenarios, which impedes the County’s ability to project the changes that will be required of long range plans to accommodate the anticipated growth.

Alternative Mitigation Measure that is Adequate and Feasible

To allow the County the opportunity to plan for population buildout with the primary and secondary growth contributions from the 2008 LRDP, the DEIR should provide estimated regional buildout growth and totals by the year 2025, inclusive of indirect economic growth. These estimates should integrate existing buildout numbers from the City of Goleta and the County of Santa Barbara to attain a projected buildout population of the Goleta Valley, which reaches from the City of Santa Barbara in the east, to Farren Rd in the west, and up to Camino Cielo Rd in the Santa Ynez Mountains foothills. This data would inform any general planning updates, capital improvement projects, and other jurisdictional planning efforts to accommodate growth that, under current general plans and long range development plans, will not receive adequate services, land uses, and environmental quality. Without this long-term analysis of growth and population, mitigations and improvements proposed as part of the DEIR would not adequately address impacts resulting from foreseeable secondary economic growth.
CEQA Comment #6. 6.3 Global Climate Change

The DEIR is clearly inadequate due to not quantifying the increase in greenhouse gas emissions and for not identifying and adopting reasonable and feasible mitigation measures for reducing greenhouse impacts. According to the DEIR, the impacts to the global climate caused by cumulative contributions of greenhouse gases from projects are mitigated by the UC Policy on Sustainable Practices. Specifically, the DEIR identifies the policy for Sustainable Transportation Practices as a mitigating policy since it commits the University to provide affordable on-campus housing and alternative means of transportation to reduce greenhouse gas emissions associated with auto commuting to and from UCSB. However, the DEIR has clarified in Section 4.13 Transportation that the 2008 LRDP would significantly increase traffic volumes and decrease levels of services at nearly all regionally roadways and intersections. These impacts would significantly increase greenhouse gas emissions to the detriment of local air quality and global climate change and the DEIR proposed no mitigations that adequately nullify these greenhouse gas contributions. The DEIR proposes only to “work with” local jurisdictions, including the County, the City of Goleta, the Metropolitan Transit District (MTD), and Caltrans, to reduce traffic levels of service to sustainable level. Additionally, the 2008 LRDP proposes increased housing on remote on-campus sites at West Campus, North Campus, and Storke Campus. Increased housing at these sites would exacerbate local traffic congestion and greenhouse gases without a significant increase in alternative transportation options, such as improved connectivity with regional bus systems.

Alternative Mitigation Measures that are Adequate and Feasible

The DEIR should study and implement the project alternatives proposed by the County in Section 5.0 of this comment letter, which would localize increased housing development near Main Campus. These alternatives would reduce the distance of student residential development from academic spaces, and therefore, the travel time and associated air quality impacts. Additionally, the DEIR should study and implement agreements with MTD to increase shuttle service and frequency to all campuses proposed under the 2008 LRDP. This increase would connect residents to the regional alternative transportation network. The study should guarantee an agreement with local jurisdictions to fund and increase alternative transportation.

Additionally, the EIR is inadequate in that it does not include obvious and commonly adopted mitigation measures, such building energy efficiency design requirements. The DEIR should identify and discuss all relevant mitigation measures included in the California Air Pollution Control Officer Associations document “CEQA and Climate Change,” January 2008.

Page 6.0-5, OLRP

CEQA Comment #7. 6.3 Global Climate Change

The DEIR relies on the UCSB Campus Sustainability Plan (CSP), which is a Draft document as of May 2007. This reliance is inadequate until the CSP is officially adopted with implementation measures and monitoring procedures. Please disclose this fact in the DEIR.

CEQA Comment #8. 6.5 Significant Irreversible Environmental Impacts

The DEIR claims that secondary impacts, including secondary population growth and resulting urbanization, is not a significant irreversible environmental impact. As discussed in prior comments of this section, the County asserts that secondary population and commercial development would significantly impact the provision of public services, transportation service levels, adequate air quality,
and overall environmental health. It is inadequate to disregard these impacts without further analysis of the irreversible impacts of secondary growth associated with the 2008 LRDP.

**Alternative Mitigation Measure that is Adequate and Feasible**

In conjunction with a 2025 population buildout scenario requested in CEQA Comment #5, the DEIR should analyze the changes to land use regionally that would be necessary to accommodate the increases in both primary and secondary population. These land use changes should be analyze for impacts to regional environmental quality and to global climate change under AB32.

*(Page 6.0-16, OLRP)*
Endnotes and References

1 Vision 2025: UC Santa Barbara Long Range Development Plan. Pg: C-7. This LRDP therefore reflects a design strategy featuring clear patterns of common open space that serve as the framework within which individual building projects are subsequently developed (Figure C.1).
2 Affordability is based on the assumption that a worker could afford a rental payment equal to 33% of this/her gross monthly income.
3 Currently Law Enforcement DIF estimated at $2,663,700 + $553,000. See Table 11 of Attachment B for additional detail.
4 Currently Fire DIF estimated at $4,925,300 + $9,640,000. See Table 11 of Attachment B for additional detail.
5 Currently Public Administration DIF estimated at $7,936,100. Libraries estimated at $1,857,800. See Table 11 of Attachment B for additional detail.
6 Other County departments include Planning and Development, Public Health, Alcohol, Drug, and Mental Health Services, Board of Supervisors, Probation, District Attorney, Public Defender, Courts, and other departments funded by the County General Fund.
7 Table 3 reports $4,351,400 in on-going annual costs for “Other County Depts.” By subtracting Parks costs, because they are addressed in Section 4.12 Recreation, the total ongoing cost is $4,040,900; see Table 21 for additional details.
8 Current Parks DIF estimated at $18,220,100. See Table 11 of Attachment B for additional details.
9 Currently Transportation DIF estimated at $57,008,800 + $33,150,300. See Tables 11 and 12 of Attachment B for additional detail.
10 http://www.admissions.ucsb.edu/QuickFacts.asp
1.0 Introduction

Response to Comment A-17-Intro-1. Comment noted.

Response to Comment A-17-Intro-2. As noted on DEIR page 2.0-1, the 2010 LRDP would replace the current 1990 LRDP.

Response to Comment A-17-Intro-3. Summer recreation, academic, or other programs do not constitute primary components of the LRDP objectives, and therefore were not included in Table 1.0-1. The potential physical impacts of construction and operation of the facilities and space that would accommodate such programs are analyzed in the EIR.

Response to Comment A-17-Intro-4. Comment noted.

Response to Comment A-17-Intro-5. The LRDP includes the land use designations and development policies that will guide Campus development.

Response to Comment A-17-Intro-6. As explained in the response to comment A-17-INTRO-5 above, the LRDP is a plan to govern the physical development of the Campus. A program EIR, followed by tiered environmental review, is thus an appropriate document, pursuant to CEQA Guidelines section 15168(a). The scope of additional environmental review for specific projects under the LRDP will be determined at the time that specific projects under the LRDP are proposed. Pursuant to CEQA Guidelines section 15168(c)(2), the Campus will apply the criteria of Guidelines section 15162 in making that determination.

Response to Comment A-17-Intro-7. The EIR’s figures represent the Campus’s best efforts at presenting information accurately and clearly. A mitigation monitoring and reporting plan will be prepared as part of the Final EIR.

Response to Comment A-17-Intro-8. Please refer to responses to comments regarding particular analyses and mitigation measures.

Response to Comment A-17-Intro-9. The Table on page 1.0-8 identifies the agencies that have permitting authority over projects implementing the 2010 LRDP. Voluntary agreements among agencies pertaining to cost sharing for public safety and other services and transportation improvements are not listed.

Response to Comment A-17-Intro-10. No changes are proposed to Embarcadero Hall in the 2010 LRDP.

Response to Comment A-17-Intro-11. Comment noted.

2.0 Summary of Environmental Impacts and Mitigation Measures

Response to Comment A-17-Summary-1. Comment noted.

Response to Comment A-17-Summary-2. Comment noted.

Response to Comment A-17-Summary-3. Comments on the alternatives section are addressed in responses to specific comments.
Response to Comment A-17-Summary-4. Comments on the growth inducing impacts section are addressed in responses to specific comments.

3.0 Project Description

Response to Comment A-17-PD-1. The Campus, like all other campuses of the University of California, will not construct any project that is inconsistent with a current, adopted LRDP. Any such inconsistent project would require an LRDP amendment, which would be subject to environmental review and to Regental approval.

Response to Comment A-17-PD-2. The LRDP addresses Campus development through the year 2025 but does not establish a schedule for that development. The mitigation identified in the LRDP EIR will be applied to all such development.

Response to Comment A-17-PD-3. The figures show only the campus lands owned by the University. Leased properties, like Embarcadero Hall, are not shown. Please see response to comment A-17-INTRO-10.

Response to Comment A-17-PD-4. The EIR analyzes the impacts of development under the 2010 LRDP, not the impacts of implementation of past projects.

Response to Comment A-17-PD-5. The enrollment figured used in the LRDP and analyzed in the LRDP EIR is expressed as three quarter average headcount so that the analysis is on a figure that averages the variation in enrollment quarter to quarter. The usual pattern is that fall quarter has the highest enrollment, and winter and spring quarters have lower enrollment levels. It is difficult to predict exact enrollment as admission offers are sent to eligible students and the percentage of eligible students who accept varies. Nevertheless, the University would not be able to build facilities and structures for a student population beyond the capacity of the LRDP. Hence, in any given school year, the number enrolled could be either over or under capacity, due to fluctuations in the rate of offers of admission to actual students admitted. The University can control the ultimate number of students on campus over the school year by adjusting the number of transfers, but the Fall enrollment each year depends on the ability to estimate how many of the students accepted will actually attend UC Santa Barbara, or attend another school to which they have been accepted.

Response to Comment A-17-PD-6. The DEIR examined the effects of developing gross square footage where the physical impact of the Campus’s development footprint would be relevant. This includes setbacks from wetlands, hydrological changes, aesthetics and others. The assignable square footage is principally used by the University to understand its instructional capacity and the need for infrastructure and services.

Regarding LRDP housing, please note that Tables 1.0-1 and 3.0-9 have been revised to correct some errors in the number of new bedspaces to be consistent throughout the LRDP and EIR. The correct number of new bedspaces is 4,766, while the correct number of net new housing units is 2,113. Please see the document Changes to Draft EIR Text.

Response to Comment A-17-PD-7. The acreage of areas devoted to various land use designations were intentionally aggregated to allow for both flexibility in planning and (most importantly) to allow for a mixture of uses (e.g. faculty and student housing projects). LRDP Table B.1 shows existing land uses by approximate percentage of the campus in 2007. DEIR Table 3.0-1 shows existing land uses by approximate percentage of the campus in 2008. In any event, the difference between the two tables in the estimated land uses by percentage of the entire 1,055-acre campus is minor.

Response to Comment A-17-PD-8. Figure B-9 and Table B-2 in the LRDP provide a general view of the location of existing assignable square feet.

Response to Comment A-17-PD-10. The use of campus recreational facilities by the general public is discussed in detail in Section 4.12, Recreation.

Response to Comment A-17-PD-11. Recommendations, policies, and suggestions from the Joint Proposal for the Ellwood-Devereux Coast were implemented by the County of Santa Barbara, City of Goleta, and University in their respective plans, projects, ordinances, and project approvals. For example, those portions of the Joint Proposal and related plans and reports that applied to lands within the jurisdiction of the University were incorporated into the approved projects for North Campus Faculty and Student Housing projects as well as the LRDP amendment and policies approved by The Regents and California Coastal Commission.

Response to Comment A-17-PD-12. Affiliates are persons enrolled in the University and employed by the University. It includes part time employees and students. It does not include vendors, contractors to the University, or family members not otherwise affiliated with the University. Regarding special events, please refer to response to Intro comment 3 above.

Response to Comment A-17-PD-13. The LRDP provides twelve school years of data and is adequate for the purposes of examining enrollment trends.

Response to Comment A-17-PD-14. The 2010 LRDP is a plan for increasing the enrollment capacity of the University to 25,000. As has happened in the past, actual enrollment at the University can, for a period of time, exceed the enrollment capacity. This is because of the inability to precisely gauge the number of accepted students who will choose to enroll. Please see response to comment A-17-PD-5.

Response to Comment A-17-PD-15. As stated in the Project Description (p. 3.0-13), the graduate student increase is projected at 17% of total enrollment. Thus, while student enrollment (undergraduate and graduate) is projected to increase at approximately 1% per year, the total proportion of graduate students within that total is expected to increase to 17%. The 17% total increase in graduate student enrollment is factored into the average annual growth rate of 1% per year.

Response to Comment A-17-PD-16. The Campus Plan, among other planning efforts described in the document, informed the development of the 2010 LRDP. It is not a component of the 2010 LRDP.

Response to Comment A-17-PD-17. The LRDP outlines a program of development for the campus through 2025. The EIR does not analyze project-specific impacts, because the LRDP does not propose individual projects—much in the same way a county does not propose individual projects in its general plan but outlines a broad plan for future development by identifying the locations and scale of various types of development and adopting broadly applicable goals, policies and programmatic implementation measures.

Indirect effects from growth connected with the University are acknowledged in the EIR. Please see RDEIR Section 4.10, Population and Housing (RDEIR, p. 4.10-25). Growth inducement is discussed on RDEIR pages 4.10-28 to -29, and in Impact POP-4. This impact is significant and unavoidable. Under the 2010 LRDP, housing will be created for all new students, faculty and staff.

Response to Comment A-17-PD-18. Section 3.7 includes a general discussion of each land use category. The Academic Uses description includes the following explanation for the uses permitted:

The Academic Uses category is intended to accommodate all instruction and research (I&R) and support functions and facilities that must be accessible by foot to students, faculty and staff largely on the Main Campus, with smaller sites on West and Storke Campuses. This also includes those Organized Research Units (ORU) and Organized Activities
(O.A) which need to be near their parent departments, most academic support and student services, and most university/community public services, such as arts and lectures.

The EIR does not make a distinction between “prohibited uses” and “prohibited development.”

For a more detailed description of the uses permitted with each land use, please see the LRDP, pages D.3 through D.5.

Please see Figure 4.8-5 for a map of the surrounding land use context.

Response to Comment A-17-PD-19. Current management activities will be moved to other locations on campus designated for Academic Uses. Specific locations have not been determined. The trips to and from campus generated by facilities management are included in the transportation analysis.

Response to Comment A-17-PD-20. The building size and locations proposed for the LRPD are programmatic The LRDP sets a limit on the total area of new buildings. Building envelopes are provided to assist with understanding the potential distribution of buildings on campus. The envelopes, as noted by the commenter, are in aggregate larger than the total square footage allowed by the LRDP. At buildout, the Campus will not include every building envelope at the full size shown on LRDP Figure D-3.


Response to Comment A-17-PD-22. It is unclear to what figure in Table 3.0-9 the commenter is referring. With regard to interpreting the tables listing the new and redeveloped housing and bedspaces that would be produced under the 2010 LRDP, please see response to comment A-17-PD-6. With regard to the commenter’s suggestions about water efficient landscaping, 90% of the landscape irrigation on campus uses recycled water (RDEIR, p. 4.14-24), and Mitigation W-3A requires use of recycled water to the extent feasible. Mitigation Measure W-3 has been amended to add part W-3H, as follows and as suggested by the commenter:

LRDP Mitigation W-3H The University shall make use of drought tolerant species in campus landscaping.

With regard to the commenter’s suggestion regarding installation of runoff control and treatment control systems in new infrastructure to protect water quality in wetlands areas, please see responses to comments A-17-HYDRO-1 through -25.

Response to Comment A-17-PD-23. The Project Description Section gives an overview of the LRDP as proposed. Technical traffic data is provided RDEIR Appendix 4.13-1.

Response to Comment A-17-PD-24. The Transportation & Circulation Section 4.13 of the RDEIR summarizes bicycle and pedestrian facilities in the campus vicinity and presents proposed enhancements with the LRDP. Bicycle facilities are displayed in RDEIR Figures 4.13-4A and 4.13-4B. There is no indication that the County of the Isla Vista Parks and Recreation District plans to create new bike paths in the Del Sol or Camino del Corto open space areas in connection with the LRDP.

Response to Comment A-17-PD-25. Phase 1 of the El Colegio Road widening project is complete, and Phase 2 is under construction. Phase 2 will provide sidewalks on the north and south sides of the roadway. In addition, intersections along El Colegio Road will be signalized and crosswalks will be provided. Thus, the proposed footpaths will not cause hazards for pedestrians. On the west side of Isla Vista, the proposed footpaths are on Campus land and do not extend in Isla Vista open space.

Response to Comment A-17-PD-26. Please refer to the general response to traffic comments.
Response to Comment A-17-PD-27. The University is providing parking for new housing complexes to accommodate the parking demand for student, faculty and staff residents. As described in RDEIR Impact TRAFFIC-9, development under the 2010 LRDP would have a significant and unavoidable impact related to parking in Isla Vista.

Response to Comment A-17-PD-28. The existing coastal access facilities are discussed in Section 4.12.1.2 and shown on Figure 4.12-3. Impacts regarding coastal access are discussed in Impacts REC-1, REC-2, and REC-3.

Response to Comment A-17-PD-29. As described on DEIR pages 4.7-30 through 37, infrastructure improvements both part of and separate from the LRDP will protect Campus water bodies. The campus addresses known runoff constituents (solids, nutrients, oil and grease) with implementation of best management practices, including installation of Continuous Deflective Separation (CDS) units at major storm drain outfall areas and installation of bioswales and storm water filtration marshes at various storm water discharge areas. Water quality monitoring of the Campus Lagoon by the Cheadle Center for Biodiversity and Ecological Restoration (CCBER) is ongoing. A portion of the water discharged to the Pacific Ocean at the East Bluff is sea water which contains no urban pollutants and therefore when discharged into the Lagoon would likely have no adverse effect on Lagoon water quality. Fresh water from urbanized drainages that would be diverted from bluff top locations to the Lagoon would be subject to additional water quality treatment methods. The campus has implemented several storm water quality systems and continues to plan for them in future development projects. Project specific environmental analysis is initiated as each project under the LRDP is proposed so that storm water is treated is such a way to prevent significant adverse impacts to ESHAs including the Campus Lagoon. The campus continues to install water quality devices and incorporate LIDs in accordance with implementation of its SWMP, by restoring the edges of the Campus Lagoon with biofiltration and bioswales and by complying with all State and Federal regulations pertaining to the protection of Environmentally Sensitive Habitat Areas (ESHA).

For example, a CDS unit is installed on the west side of the Main Campus in a storm drain pipe that drains into the Campus Lagoon and bioswales were constructed at Manzanita Village Housing near the edge of the Campus Lagoon to treat water flowing into the Lagoon. The Main Campus Infrastructure Renewal Project Phase I, approved by the Coastal Commission in December 2009, includes additional capacity for the diversion of water from Ocean outfalls and adds a CDS unit and over 20,000 square feet of restoration on the slope above the Campus Lagoon as a storm water filtration marsh. The storm water outfall in this location is designed to slow water runoff and filtrate much of it through plants and into a willow area at the edge of the Campus Lagoon. A CDS unit was installed for the El Colegio Road Widening Project in 2009 to filter water prior to entering the San Clemente Storm Water Management System which was constructed in 2006 through 2008 to collect and clean water from the San Clemente Housing area. Also a system of bioswales was constructed along the edge of Parking Lot 38 near Storke Field to catch runoff from Parking Lot 30 and divert the water from flowing in the Storke Campus wetland ESHA.

4.0 Environmental Setting

Response to Comment A-17-ES-1: Ventura County growth is incorporated in the analysis of DEIR sections where that information is relevant, such as air quality and transportation.

4.1 Aesthetics

Response to Comment A-17-AES-1. County policies do not apply to University projects. Mitigation for Impact AES-4 has, however, been amended as follows to address aesthetic impacts on surrounding areas, including Isla Vista housing adjacent to Ocean Road:

LRDP Mitigation AES-4B: Project development and design on the Storke Campus shall consider the effect of existing and proposed landscaping on views.
Prior to approval of Storke Campus development projects visible from off-campus areas, the UC Santa Barbara Design Review Committee shall review project designs for:

- Campus development and design along Ocean Road respecting the adjacent Isla Vista and Storke Ranch;
- Compatibility with adjacent neighborhoods in terms of scale, proportion, appearance, and solar access, as well as maximizing views to the Pacific Ocean; and
- Project development and design on the Storke Campus shall consider ensuring the effect of existing and that proposed landscaping does not block on views of the mountains or ocean.

With this and the other proposed mitigation, the LRDP’s aesthetic impact on Isla Vista will be less than significant.

Response to Comment A-17-AES-2. The header on page 4.1-27 has been changed as follows:

4.21.2.3 2010 LRDP Impacts and Mitigation Measures

The header on page 4.1-42 has been changed as follows:

4.21.2.3 Cumulative Impacts and Mitigation Measures

Response to Comment A-17-AES-3. As explained on DEIR pages 4.1-27 through -32, the LRDP building program would increase opportunities for views on the Main Campus. No mitigation is required.

Response to Comment A-17-AES-4. The structures allowed in the LRDP have not yet been designed; therefore, details regarding style, location and massing are not yet available. The DEIR concludes that the LDRP policies and land use plan, which includes implementation of the Campus Plan and Campus Housing Study, will ensure that adverse impacts relate to the visual character of the Main Campus will be less than significant. No mitigation is required.

Response to Comment A-17-AES-5. The mitigation for Impact BIO-3 has been amended to add new Mitigation Measure BIO-3D:

LRDP Mitigation BIO-3D: To mitigate impacts to wildlife habitat the University shall apply the following replacement ratios for mature trees (8 inches or greater diameter at breast height) which are removed by LRDP construction:

- 10:1 for mature native trees; and
- 3:1 for mature non-native trees.

Replaced trees shall be either sycamore, oak, or another native tree species. In the case when oak trees are removed, oak trees shall be used for replacements. Placement of replacement trees should be 20 feet minimum, and they shall be monitored, nurtured, and protected within the dripline to encourage survival of a minimum of 5 years.
All trees of other biological importance shall be replaced at a ratio of 3:1.

**Response to Comment A-17-AES-6.** Please see response to comment A-17-AES-5.

**Response to Comment A-17-AES-7.** Mitigation Measures AES-4A and AES-4B (as revised), and AES-5A require review of proposed projects by the UCSB design review Committee and set specific standards for that review. These measures therefore do not defer mitigation. Moreover, these measures will ensure that aesthetic impacts are less than significant. No further mitigation is required. Mitigation for Impacts AES-4 and AES-5 do not “request” the Design Review Committee to review visual impacts. Rather, it requires that body to use as a criterion the protection of views from viewpoints along Storke Road, El Colegio Road, Los Carreros, and roadways within Isla Vista that intersect El Colegio Road, and within and through the Storke Campus.

**Response to Comment A-17-AES-8.** Please see response to comment A-17-AES-7.

**Response to Comment A-17-AES-9.** Please see response to comment A-17-AES-7.

**Response to Comment A-17-AES-10.** LRDP Policy SCEN-5 is part of the proposed project. Impact AES-3 discusses Policy SCEN-5 because it is pertinent to the analysis of the impact, even though it may also be pertinent to other impacts, and Mitigation Measure AES-3A correctly assumes that all LRDP policies will be implemented. Please see response to comment A-17-AES-5.

**4.2 Air Quality**

**Response to Comment A-17-AQ-1.** DEIR Section 4.2 was entirely replaced by revised, RDEIR Section 4.2. Accordingly, as authorized by State CEQA Guidelines Section 15088.5(f)(2), the University will respond to comments on RDEIR Section 4.2, but not to comments on DEIR Section 4.2 which has been superseded. Please see the responses to letter R-26, Section 4.2.

**4.3 Biology**

**Response to Comment A-17-BIO-1.** The DEIR identifies all sensitive species known to be present or with potential to be present on the Campus, and identifies known locations or potentially suitable habitat areas for those species. Only the Southern tarplant has been found in, or has habitat in, areas proposed for development. 2010 LRDP Policies ESH-1 through ESH-29 provide measures to avoid and minimize impacts to sensitive species within Campus lands due to implementation of the 2010 LRDP.

Thus, no impacts to plover or sensitive species other than tarplant were identified as part of LRDP implementation. Moreover, plover habitat within Campus lands is closely monitored by COPR staff, and nesting areas are protected by exclusion areas, docents, and Campus police. This active management has succeeded in protecting plover populations (see DEIR at page 4.3-19), and will continue to do so during the period of the LRDP.

**Response to Comment A-17-BIO-2.** Please see response to comment A-17-AES-5.

**Response to Comment A-17-BIO-3.** DEIR Figure 4.3-4 juxtaposes proposed development and the proposed ESHA overlay.

**Response to Comment A-17-BIO-4.** 2010 LRDP Policies ESH-1 through ESH-29 provide sufficient measures to avoid impacts to sensitive species within campus lands due to implementation of the 2010 LRDP, which would include any portions of the proposed greensward that may also be identified as ESHA. Please see response to comment A-17-BIO-1.
Mitigation Measure BIO-1F has been added, as follows, to add a setback from wetlands:

**LRDP Mitigation BIO-1F:** In areas which are not already developed, plans for development within 100-feet of aquatic resources, such as wetlands, shall prohibit pathways in excess of two multi-use lanes, and filling, dredging, grading, and planting of turf or non-native species, recreations fields, or automobile roads.

**Response to Comment A-17-BIO-5.** Mitigation would be triggered by the results of site-specific surveys prepared for particular projects at the time or proposal. Please see response to comment A-17-BIO-4.

**Response to Comment A-17-BIO-6.** Mitigation Measures BIO 1A through 1C and HYD-1A, 2A, and 2B would ensure that potential discharges of stormwater pollutants resulting from LRDP implementation are controlled and minimized. Specific amounts and constituents of runoff cannot be determined at this time, as the LRDP provides land use designations and design principles rather than specific construction program. Quantitative analysis will be provided as appropriate in connection with environmental review of specific projects.

**Response to Comment A-17-BIO-7.** Mitigation Measures BIO-1A through -1E would ensure that impacts to aquatic and wetland resources would be less than significant. No further mitigation or policy change is required.

**Response to Comment A-17-BIO-8.** The LRDP does not propose new structures related to shoreline protection, although the Campus will continue to maintain existing berms on the east and west ends of the Lagoon. LRDP policies SH-1 through SH-3 address shoreline protection activities.

**Response to Comment A-17-BIO-9.** LRDP Policy ESH-25 provides an exception to the limits set out in Policies ESH-23 and -24. There is no contradiction between the policies. Mitigation Measure BIO-1D requires development of project design features that will minimize noise impacts to adjacent aquatic resources. Mitigation Measure BIO-3C requires nesting bird surveys and restricts noise producing construction activities within 200 feet of active nests. These measures, along with LRDP Policies ESH 23, 24, and 25, are intended to allow LRDP implementation to occur while avoiding and minimizing noise impacts to sensitive species and habitats. However, to clarify the LRDP language used, ESH 23, 24, and 25 will be replaced with EIR Mitigation BIO-1D, which has also been amended as follows:

**LRDP Mitigation BIO-1D:** Project plans for any development under the LRDP within 100 feet of aquatic resources shall include design features to minimize the effects of increased noise, lighting, and automotive and foot traffic density on the adjacent aquatic resource. In the case of development within 100 feet of Goleta Slough, plans shall incorporate consultation with the City of Santa Barbara Airport Department, in addition to consultation with the agencies listed under Mitigation BIO-1A.

**Response to Comment A-17-BIO-10.** The South Parcel Restoration Plan was prepared by the University and approved by the California Coastal Commission.

**Response to Comment A-17-BIO-11.** Tarplant is found on campus lands in a variety of habitats, but is primarily found in disturbed annual (non-native) grassland areas that have been compacted by traffic or heavy equipment travel, or that are slightly depressional or fractionally wetter than surrounding areas. The species responds well to propagation by seed, and has recently been successfully established in and around the San Clemente housing bioswale and stormwater basins. The minimum 1:1 replacement ratio is considered sufficient to mitigate impacts to this species.
Response to Comment A-17-BIO-12. The discussion of Impact BIO-3 on DEIR pages 4.3-38 to 4.3-41 has been amended to add a reference to LRDP Policy SCEN-5, as follows:

SCEN-5. Trees with significant scenic or biological value shall be retained or relocated to the extent feasible, or replaced at a 3:1 ratio.

Please see response to comment A-17-AES-5 adding new Mitigation Measure BIO-3D. The native tree replacement ratio in the new mitigation measure exceeds the minimum replacement ratio specified in proposed LRDP Policy SCEN-5.

The commenter does not specify in what manner Mitigation Measure BIO-3A conflicts with LRDP policies pertaining to grading and erosion control.

4.4 Cultural Resources

Response to Comment A-17-CR-1. The proposed change has been made throughout the document for the Final EIR.

Response to Comment A-17-CR-2. The appended report was labeled “draft” because it was part of the Draft EIR. A “final,” although unchanged version, will be included in the Final EIR.

Response to Comment A-17-CR-3. Previously undiscovered archaeological resources will be addressed during construction of specific projects as required by Mitigation Measures CULT-1A through CULT-1M, CULT-2A through CULT-2I, and CULT-3A through CULT-3F. Avoidance and project redesign are among the potential mitigation measures if resources are detected. Any necessary amendments to land-use designations will be considered at that time. The DEIR proposes all mitigation measures required to reduce impacts a less than significant level. Historical resources are addressed separately.

Response to Comment A-17-CR-4. Potential impacts to specific historic resources will be addressed in detail at the time a specific project is proposed. West Campus structures, including those associated with the former Devereux property, are discussed at DEIR page 4.4-19. The Campus is the best source of information regarding structures on campus.

4.5 Geology

Response to Comment A-17-GEO-1. The map configuration suggested would not present data effectively. Please compare Figure 4.5-1 with Figure 3-9 for the requested information.

Response to Comment A-17-GEO-2. The LRDP does not propose new structures related to shoreline protection. Thus, no analyses of, or mitigation for, the impacts of such structures is required.

Response to Comment A-17-GEO-3. Staircases and drains have been constructed in the past, as part of previous efforts to manage bluff erosion. The 2010 LRDP proposes two new staircases, one north of Goleta Point in the Main Campus area, and one south of Devereux Slough in the West Campus area. Existing and proposed coastal access points (including staircases) are shown in Figure E.3 of the LRDP. Erosion impacts are discussed in Impact HYD-4, and stormwater drain pipes are addressed therein and in Section 4.16, Utilities. The LRDP proposes to remove storm drainage pipes from bluff tops without installing new ones.

Response to Comment A-17-GEO-4. Specific building locations are not shown on the map, only general building envelopes. The final location of buildings would be subject to setbacks following site-specific geotechnical surveys. Nor further mitigation is required. LRDP Policies ESH-1 through -29 would apply to ESHA lands wherever they occur.
Response to Comment A-17-GEO-5. The proposed map would not provide accurate information. The LRDP designates potential building envelopes—the area that is available for a given building, rather than the building’s actual footprint. Moreover, the location of the fault lines must be confirmed and more precisely mapped before actual buildings are designed. The LRDP states:

The UC Seismic Safety Policy requires that all structures comply with Title 24 of the California Building Standards Code, or local regulations, whichever are stricter. The UC Policy requires anchorage for seismic resistance of nonstructural building elements such as furnishings, fixtures, material storage facilities, and utilities that could be hazardous in the event of an earthquake. Compliance with these codes and policies sufficiently addresses risks from ground shaking on campus.

The 2010 LRDP also includes the following policy to address seismic hazards:

- GEO-1. Buildings shall not be placed astride any faults. The actual setback from the fault trace shall be determined based upon site-specific geotechnical studies, but no closer than fifty feet from active or potentially active faults.

Also see Policy GEO-2 described in Impact GEO-1 above. With the implementation of these policies, impacts will be less than significant. No further mitigation is required.

Response to Comment A-17-GEO-6. As explained above, the suggested mapping would not contribute to the current environmental assessment and mitigation. The map indicates the presence of expansive soils. All projects on campus would be subject to the requirement of a geotechnical investigation that will provide necessary construction techniques to mitigate for the soils. Unlike active faults, expansive soils need not be avoided.

The DEIR states on page 4.5-21 (note correction):

Because the 2008 2010 LRDP would intensify development of the Main Campus, building on potentially expansive soils may be unavailable unavoidable. Methods are available to reduce the effects of expansive soils on pavement and structures, including: replacement of the expansive soil with approved fill material, pretreatment of soils with water or other substances, additional slab and foundation reinforcement, and use of appropriate foundation type.

As stated in the regulatory section, University of California standards require that development projects on campus comply with BSC standards for addressing expansive soils. The UC Santa Barbara campus requires that geotechnical studies be completed for all applicable projects, unless sufficient information already exists. Geotechnical studies prepared for the University should address expansion and settlement potential. Recommendations made in the geotechnical study should be followed in the preparation of the site and the construction of the building. Impacts therefore will be less than significant.


Response to Comment A-17-GEO-9. Compliance with Title 24 of California Building Safety Code, combined with University of California policy, would reduce potential seismic impacts to a less-than-significant level. If a local building code is stricter than Title 24 it will be applied, pursuant to UC policy. In that event, seismic impacts would be less than significant.

4.6 Hazards and Hazardous Materials

Response to Comment A-17-HAZ-1. The text on page 4.6-2 has been clarified as follows:

**Occupational Safety and Health Administration.** The California Occupational Safety and Health Administration (Cal/OSHA) and the Federal Occupational Safety and Health Administration (Fed/OSHA) are the primary agencies that regulate hazardous materials and potentially hazardous conditions related to worker and public exposure to hazardous materials. State and local agencies often have either parallel or more stringent rules than federal agencies. Cal/OSHA assumes primary responsibility for developing and enforcing workplace safety regulations in California. The regulations cover accident and illness prevention programs, requirements for employee safety training, hazardous substance exposure warnings, and emergency evacuation and fire prevention plan preparation. Cal/OSHA is the agency responsible for enforcing hazard communication program regulations and requires state entities such as the University to make Material Safety Data Sheets (MSDSs) available to all employees and students for hazard information and training programs.

Furthermore, the paragraphs regarding the Chemical Hygiene Plan and Hazard Communication Program have been deleted from page 4.6-8. The text on page 4.6-2 has been amended following the paragraph describing OSHA to include the two paragraphs as follows:

**Chemical Hygiene Plan.** All Campus laboratories are required to implement a Chemical Hygiene Plan which outlines procedures to properly manage and dispose of hazardous chemicals. EH&S provides a template Chemical Hygiene Plan that each campus laboratory must use to develop its own, laboratory-specific guidelines. New laboratories constructed at the University are required to implement a Chemical Hygiene Plan.

**Hazard Communication Program.** As required by California Code of Regulations, Title 8, General Industry Safety Order 5194, UC Santa Barbara's Hazard Communication (HAZCOM) Program is actively implemented throughout campus in order to ensure the health and safety of all University employees working with or around chemical substances. Under the HAZCOM program the University is required to identify all hazardous materials used in each work area by inventorying these materials, labeling all hazardous materials with product name and appropriate hazard warnings, compiling Material Safety Data Sheets (MSDSs) and making the MSDSs available, training all employees about specific hazards of all hazardous materials in their workplace, and providing and maintaining appropriate personal protective equipment as required. A hazardous waste program is maintained by the University so that all hazardous waste is collected, stored, and disposed in accordance with federal, state, and local regulations. The hazardous waste program coordinates hazardous material pickups and laboratory clean-out procedures.

Response to Comment A-17-HAZ-2. The text on page 4.6-2 has been amended to include information about local implementation as follows:

**Resource Control and Recovery Act of 1974 (RCRA).** RCRA was enacted as the first step in the regulation of the potential health and environmental problems associated with solid hazardous and non-hazardous waste disposal. The U.S. Environmental Protection Agency (EPA) has delegated the implementation and enforcement of RCRA to the State of California. The state has delegated its authority to the Santa Barbara County Fire Department as the Certified Unified Program Agency (CUPA) for the County of Santa Barbara in the form of Health and Safety Code (H&SC), Division 20, Chapter 6.5, Hazardous Waste Control Law (Sections 25100 through 25250.28). RCRA involves permitting and management of hazardous waste facilities and tracking hazardous wastes from point of origin to ultimate disposal.

Response to Comment A-17-HAZ-3. The text on page 4.6-3 has been amended to include the suggested information as follows:
**Hazardous and Solid Waste Amendments of 1984 (HSWA).** The HSWA law was enacted to close RCRA loopholes and regulate leaking underground storage tanks (USTs). The law is embodied in H&SC Section 25280 et seq. at the state level. The California State Water Resources Control Board (SWRCB), the Regional Water Quality Control Board (RWQCB), and the local County Department of Environmental Health Santa Barbara County Fire Department—as a Certified Unified Program Agency (CUPA)—oversee removal and cleanup of leaking USTs.

Response to Comment A-17-HAZ-4. The text on page 4.6-3 has been amended as follows:

**Lead-Based Paint and Asbestos Standards.** The removal and handling of asbestos-containing materials is governed primarily by EPA regulations under Title 40 Code of Federal Regulations, but is implemented by the Santa Barbara County APCD. Fed/OSHA also has a survey requirement under Title 29 Code of Federal Regulations, which is implemented by Cal/OSHA under Title 8 Code of California Regulations. These regulations require facilities to take all necessary precautions to protect employees and the public from exposure to asbestos. Locally, the Santa Barbara County Fire Department CUPA is responsible for compliance with California laws covering these materials.

Response to Comment A-17-HAZ-5. The text on page 4.6-4 has been amended as follows:

**Title 22, California Code of Regulations.** Title 22 of the California Code of Regulations regulates the use and disposal of hazardous wastes in California. It contains regulatory thresholds for hazardous wastes that are more restrictive than the federal hazardous waste regulations. Title 22 is implemented locally by the Santa Barbara Fire Department CUPA.

Response to Comment A-17-HAZ-6. The text on page 4.6-4 has been amended as follows:

**California Health and Safety Code Sections 25500 et seq.** The California community right-to-know hazardous material law applies to any facility that handles any hazardous material (chemical, chemical-containing products, hazardous wastes, etc.) in a quantity that exceeds reporting thresholds. The most common thresholds that trigger regulation are 500 pounds of solid, 55 gallons of liquid, and 200 cubic feet of compressed gas, based on the presence of individual chemicals per building. The study area lies within the jurisdiction of the Santa Barbara County Fire Department, Fire Prevention Division, which is the CUPA for the region. (The CUPA is the County’s local agency that has been certified by Cal EPA to enforce hazardous materials/waste regulations.)

These sections of the code are often referred to as the “Business Plan Law”. In cooperation with the CUPA, the University has adopted and implements a Hazardous Materials Business Plan. In the end, all of the University’s hazardous materials programs are overseen by the CUPA because they are responsible for reviewing the University’s plan and for performing site inspections on the campus. The CUPA also inspects the campus, through random “spot checks,” for hazardous material inventories (more information on this below).

Through a Memorandum of Understanding (MOU) between UC Santa Barbara and the County of Santa Barbara Environmental Health Services Division, the University joined the Operational Agreement implementing the County’s Integrated Hazardous Materials Management System. The agreement covers the coordination of hazardous material management efforts in Santa Barbara County by the Environmental Health Services Division and the Agricultural Commissioner’s Office of the Department of Agricultural and Environmental Management; County, City, and Special District Fire Agencies; and County Office of Emergency Services. The MOU outlines the process by which inspections, inventory updates, Emergency Response Plan revisions, and enforcement are to occur as a result of the University entering into this agreement.

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Response to Comment A-17-HAZ-7. The text on page 4.6-6 has been amended as follows:

Title 40 CFR Part 112, Oil Pollution Prevention. These sections are often known as the “Aboveground Storage of Petroleum Act.” Title 40 CFR Part 112, requires that a Spill Prevention Control and Countermeasures Plan (SPCC) be prepared by owners of above ground storage tanks (ASTs) larger than 660 gallons, or if the total facility capacity exceeds 1,320 gallons. A SPCC plan provides an analysis of the potential for release from ASTs and the measures that could be put into place to reduce the potential of release. These sections are implemented through H&SC Section 25270 et seq., effective January 1, 2008. The program is now implemented by the CUPA. The University prepared their SPCC in January 1996 (last revised in August 2003) in accordance with the requirements of Title 40 CFR Part 112.

Response to Comment A-17-HAZ-8. The University does not now, and does not anticipate in the future, the storage of regulated materials at such quantities that would require reporting under THE California Accidental Release Program. If such quantities were reached, the University would be required to comply with this and other applicable laws regarding such materials. No mitigation is required.

Response to Comment A-17-HAZ-9. Please see the response to comment A-17-HAZ-6.

Response to Comment A-17-HAZ-10. The text on page 4.6-7 has been amended as follows:

EH&S is responsible for managing the Emergency Response Team along with the Santa Barbara County Fire Department, and has issued a Hazardous Materials Emergency Response Plan as part of their Business Plan to provide procedures for the Team to follow in response to hazardous materials incidents. The plan was submitted to the CUPA for oversight, approval and inclusion into the Santa Barbara County Hazardous Materials Emergency Response Area Plan, in accordance with the Business Plan law. Any incident is reported to the CUPA for appropriate follow-up.


Response to Comment A-17-HAZ-12. Comment noted.

Response to Comment A-17-HAZ-13. The text on page 4.6-8 has been amended:

UC Santa Barbara Chemical Hazardous Waste Disposal Procedure. EH&S requires that campus hazardous waste generators comply with strict chemical waste disposal procedures to prevent injury, minimize environmental health hazards, and meet regulatory requirements. The procedures outline how to minimize initial generation, comply with requirements for waste storage, appropriately label containers, properly segregate (chemicals, radioactive waste, and biohazardous material), and properly dispose of hazardous waste (see Appendix 4.6-1). The University has the required Santa Barbara County Hazardous Waste Generator permit issues by the CUPA and is inspected for compliance with all applicable laws and regulations by the CUPA.

Response to Comment A-17-HAZ-14. Text on page 4.6-9 has been amended as follows:

Hazardous Chemicals. Hazardous materials are currently stored, utilized and disposed by several departments and groups on the campus of UC Santa Barbara. The University has an operating hazardous waste treatment system and has recently released notification for a second treatment system. Since the University is not permitted to treat, incinerate, or dispose of hazardous chemicals onsite, all final disposal activities are done at offsite licensed facilities. The University is regulated as a Hazardous Waste Generator, under the Santa Barbara County Hazardous Waste Ordinance, but also as a Permit-by-Rule facility under the Hazardous Waste Control law, with specific additional inspection requirements.
Response to Comment A-17-HAZ-15. The hazardous waste packaging and storage area is located rooms 1107 and 1113 in the Environmental Health and Safety building (Bldg. #565). The types and amounts of hazardous waste stored in the rooms vary greatly over time. The majority of the materials are less than 1 gallon in volume. The hazardous waste in addition to the amounts indicated in the Hazardous Materials Business Plan amounts are:

<table>
<thead>
<tr>
<th>Material</th>
<th>Volume</th>
<th>Additional Materials</th>
<th>Weight</th>
</tr>
</thead>
<tbody>
<tr>
<td>Antifreeze</td>
<td>55 gal</td>
<td>Flammable Silica Gel</td>
<td>200 lbs</td>
</tr>
<tr>
<td>Latex Paint</td>
<td>110 gal</td>
<td>Toxic Lab Debris</td>
<td>200 lbs</td>
</tr>
<tr>
<td>Flammable Solvents</td>
<td>550 gal</td>
<td>Alkaline Batteries</td>
<td>800 lbs</td>
</tr>
<tr>
<td>Mineral Acids</td>
<td>110 gal</td>
<td>Lead Acid Batteries</td>
<td>600 lbs</td>
</tr>
<tr>
<td>Petroleum oil</td>
<td>55 gal</td>
<td>Fluorescent Lamps</td>
<td>600 lbs</td>
</tr>
</tbody>
</table>

Some 55-gallon drums are located on the paved and fenced surface lot directly northeast and adjacent to the Environmental Health & Safety Building (Building 565). The packaging/storage area portion is approximately 15,000 square feet. The EH&S Building is an H2 occupancy structure which provides hazardous waste storage for the Santa Barbara County Public Works Community Household Hazardous Waste Collection Center and campus programs. Procedures and training required on site.

Additionally, the Santa Barbara County Public Works Community Household Hazardous Waste Collection Center is located at the Environmental Health and Safety building. The household hazardous waste is transported to a disposal facility on a weekly basis. The containers that are not full are stored in rooms 1107, 1113 and the facility yard until they are ready for shipment. Employees are trained in compliance with 22 CCR 66265.16D (40CFR 265.16) and 8 CCR 5192 (29 CFR 1910.120).

Response to Comment A-17-HAZ-16. The text on page 4.6-9 has been amended as follows:

The County of Santa Barbara is charged with ensuring compliance with all CUPA programs, laws and regulations at the University. The County of Santa Barbara intermittently inspects the University for consistency with hazardous chemicals management standards (more on this below).

Response to Comment A-17-HAZ-17. The text on page 4.6-10 has been amended as follows:

The University has removed all of its known underground storage tanks (USTs), which were previously used to contain hazardous fuels, and continues to monitor contamination at the former UST sites. If additional USTs are discovered in the future, the University may need to remove and remediate additional sites. Fuel used for the University’s fleet of vehicles is stored in aboveground storage tanks. Each tank is double-walled and fitted with automatic leak detection and over-fill protection. Aboveground storage tanks at the University are subject to County inspection by CUPA staff. Diesel-powered emergency generators are employed throughout the campus, and each contain individual “belly tanks” for aboveground fuel storage. Aboveground storage tanks are addressed in the University’s SPCC.

Response to Comment A-17-HAZ-18. Please see response to comment A-17-HAZ-17.

Response to Comment A-17-HAZ-19. Please see response to comment A-17-HAZ-17.

Response to Comment A-17-HAZ-20. The text on page 4.6-10 has been amended as follows:

In 2001, the University agreed to participate in the EPA's voluntary self-audit program. Later that year, EH&S conducted an audit of 179 different laboratories, which involved correcting violations, reporting to the EPA, and implementing new management techniques to improve hazardous waste.
compliance on campus. Of the 1,073 containers inspected by the audit team in 2001, 266 containers were found to be in violation. Since 2001, the University has been subject to inspections from the CUPA. The CUPA is required to inspect the University's hazardous materials managing practices at least every three years. Inspections since 2001 have identified only labeling and improper storage violations for hazardous materials containers, as well as employee training deficiencies. The CUPA anticipates that its inspections of the University will increase to four times a year. The University is permitted and inspected as a Hazardous Waste Generator by the CUPA, pursuant to Santa Barbara County Ordinance 18-31.1.


Response to Comment A-17-HAZ-22. Potential exposure to and release of hazardous materials are discussed in Impacts HAZ-1, 2, and 3, beginning on DEIR page 4.6-20. It is assumed that the University and its associated activities on campus locations will remain in compliance with all regulatory requirements in regards to the possibility of accidents.

Response to Comment A-17-HAZ-23. Comment noted.

Response to Comment A-17-HAZ-24. The information presented in Table 4.6-1 was specific to 2005. There are presently no LUST sites on-campus.

Response to Comment A-17-HAZ-25. Unexploded ordnance is addressed in Section 4.6.1.4 and under Impact HAZ-8.

Response to Comment A-17-HAZ-26. Comment noted.

Response to Comment A-17-HAZ-27. The definition of sensitive receptor is defined for each section. The definition of sensitive receptor may vary depending on the topic being addressed, and applicable laws and standards.

Response to Comment A-17-HAZ-28. As required by Mitigation Measure HAZ-6B, the campus EOP and pertinent departmental EOPs will be updated as new development occurs on campus.

Response to Comment A-17-HAZ-29. The text on page 4.6-18 has been amended as follows:

Note that emergency response to tsunamis is discussed in Section 4.5 Geology, Soils, and Geotechnical 4.7 Hydrology and Water Quality.

Response to Comment A-17-HAZ-30. The University is required to comply with all applicable laws, programs, and procedures associated with hazardous materials. As discussed in Impact HAZ-1, the application of existing regulations is sufficient to reduce impacts related to hazardous materials on campus, including risks to sensitive receptors, to a less than significant level. The Campus cannot at this time project the amounts of specific substances that may be used in facilities constructed under the LRDP, as these buildings have not been designed or assigned to specific programs. No further mitigation is required.

Response to Comment A-17-HAZ-31. Section 4.6 discloses the presence of hazardous materials throughout much of campus, and outlines the controls and procedures in place to address the presence, use, and movement of such materials. Facilities using hazardous materials must be designed in compliance with applicable regulations as outlined in the section. Impacts will be less than significant. No further mitigation is required.

Response to Comment A-17-HAZ-32. All LRDP policies are part of the proposed project, including Policies HAZ-5 and HAZ-7. Impact HAZ-1 discusses Policies HAZ-1 through -4 and HAZ-6 because they
are pertinent to the analysis of the impact, even though other LRDP HAZ policies may be pertinent to other impacts. The LRDP EIR correctly assumes, in all impact analyses and discussions of the effectiveness of mitigation, that all LRDP policies will be implemented. The EIR also assumes compliance with existing laws and regulations.

Response to Comment A-17-HAZ-33. The storage of hazardous materials at the University is addressed in Section 4.6.1.3. Compliance with existing regulations and proposed mitigation measures is sufficient to reduce any impacts associated with hazardous materials to a less than significant level. No further mitigation is required.

Response to Comment A-17-HAZ-34. LRDP Mitigation HAZ-2A has been amended as follows:

The University will survey for contaminants and/or perform Phase I Environmental Site Assessments before demolishing buildings. The University shall conduct due diligence surveys to document the potential for hazardous materials contamination. If determined necessary by the Phase I surveys, Phase II site assessments (including the collection of soil and possibly groundwater samples) will be conducted to further assess the potential for contamination. Site assessment work plans shall be prepared by a registered professional and submitted to the Santa Barbara County Fire Prevention Division (SBCFPD) and the California Department of Toxic Substances Control (DTSC) for review and approval prior to implementation. Additional notification or approval may be required from the Regional Water Quality Control Board (RWQCB).

Contractors shall be required to document on-site availability of applicable MSDS sheets and attendance of workers at safety and hazards training sessions. Contractors shall otherwise be required to document compliance with applicable hazardous materials regulations, such as the obtainment of Hazardous Waste Generator permits from the CUPA if warranted.

In addition, the University will continue to perform, enforce and/or administer the same regulating plans and programs it has in the past regarding all its potentially hazardous activities.

Response to Comment A-17-HAZ-35. See response to comment A-17-HAZ-34.


Response to Comment A-17-HAZ-37. Departmental responsibility will be assigned in the Mitigation Monitoring and Reporting Plan to be prepared as part of the Final EIR. Implementation of mitigation in this section will likely require coordination between several departments on campus. No further mitigation is required.

Response to Comment A-17-HAZ-38. The impact summary on page 4.6-24 has been amended to reference mitigation measures listed elsewhere in the section (HAZ-2, HAZ-6, and HAZ-8). The discussion will be amended as follows:

The presence of hazardous materials and waste handling would increase as a result of campus growth under the 2008-10 LRDP, as discussed under impact HAZ-1. However, these materials would continue to be handled in accordance with EH&S policies and programs and with applicable local, state, and federal laws and regulations. Also, the University’s use of such materials is in a limited capacity, since the programs of study and research at UCSB do not require their intensive or extensive use. Continued implementation of existing regulations and procedures would result in a less than significant impact to existing schools, child care centers, and other sensitive receptors associated with general hazardous materials and waste handling.
Potential impacts related to construction activities are addressed in impacts HAZ-2, HAZ-6 and HAZ-8. The implementation of mitigation outlined under those impacts will reduce risks associated with such activities to sensitive receptors to a less than significant level.

HAZ-8 will be amended as follows:

Development proposed under the 2008 LRDP could expose construction workers and/or landscape workers, as well as sensitive receptors and the general public, to contaminated soil/groundwater and unexploded ordnance from historical uses within the project area.

With these amendments, no further mitigation is required.

Response to Comment A-17-HAZ-39. See response to comment A-17-HAZ-38. Increased use, storage, transport, and disposal of hazardous materials are addressed in Impact HAZ-1, which concludes that the associated impacts will be less than significant. Handling and disposal of contaminated building materials discovered during building demolition, including asbestos containing materials and lead based paint, are address in Impact HAZ-2 and Mitigation Measure HAZ-2A. No further mitigation is required.

Response to Comment A-17-HAZ-40. See response to comment A-17-HAZ-34.

Response to Comment A-17-HAZ-41. Mitigation HAZ-8B is amended as follows:

If petroleum hydrocarbon-contaminated soil (except where hydrocarbons occur naturally) is encountered during construction activities, SBCFPD and the Santa Barbara County Air Pollution Control District (SBAPCD) shall be notified as soon as possible within 24 hours, unless the release warrants calling 9-1-1.

Response to Comment A-17-HAZ-42. Mitigation HAZ-8B includes a bullet which requires the segregation of clean soil from contaminated soil. This portion of the mitigation measure will be amended as follows:

- Clean soil, including clean soil upon which contaminated stockpiles are placed, must be segregated from contaminated soil.

There are several acceptable methods of segregation; therefore, no particular method is specified.

Response to Comment A-17-HAZ-43. The DEIR concludes that impacts related to hazardous materials will be less than significant. No further mitigation is required.

Response to Comment A-17-HAZ-44. The decommissioning of the Venoco site is not within the University’s jurisdiction or authority. It is therefore not a part of the LRDP and is outside the scope of this EIR. Please see response to comment A-12-63.

4.7 Hydrology and Water Quality

Response to Comment A-17-HYDRO-1. The UC Santa Barbara’s Draft Storm Water Management Plan was approved by the Central Coast Regional Water Quality Control Board (CCRWQCB) in June 2008, and a final version was approved in June 2009 and can be viewed at:


In November 2009, UC Santa Barbara signed a declaration to participate in the Central Coast joint effort for developing hydro-modification control criteria in compliance with the municipal storm water permit.
The North Campus Faculty and Student Housing projects were approved, with conditions, by the California Coastal Commission (CCC) in November 2006 (Notice of Impending Development (NOID) 1-06). The University is implementing the conditions of approval, and a Notice of Intent in accordance with the National Pollutant Discharge Eliminate System (NPDES) Construction Storm Water Permit has been filed with and approved by the CCRWQCB (Waste Discharger Identification number 3 42C355218).

Also since publication of the RDEIR, on September 2, 2009, the State Water Resources Control Board adopted Order 2009 0009-DWQ, State Water Resources Control Board NPDES General Permit for Storm Water Discharges Associated With Construction and Land Disturbance Activities (“General Permit”), superseding Order 99-08-DWQ and establishing new requirements for storm water discharges from construction activities. The new General Permit takes effect on July 1, 2020, and applies to site disturbance as small as one acre, as described below. Under the General Permit, any construction activity affecting one or more acres of land, or any activity that is part of a common plan of development or sale that disturbs one acre or more, as well as construction activities for linear overhead/underground utility projects that result in disturbance of one acre or more, must obtain a General Construction Activity Stormwater Permit Waste Discharge Identification Number. The September 2009 General Permit implements substantial changes from the prior permitting system, including risk-based assessments and numeric effluent limitations for projects covered under the General Permit. The Permit also imposes effluent monitoring and reporting requirements.

The new General Permit classified construction sites according to risk levels. Thus, Risk Level 1 has the least stringent requirements and is not subject to either the Numeric Action Limits (NALs) or Numeric Effluent Limits (NELs) which have been established for pH and turbidity. In contrast, a NAL of 250 NTU, and a pH of 6.5-8.5 has been established for Risk Level 2 and 3, while NELs of 500 NTU and a pH of 6.0-9.0 have been established for Risk Level 3 projects. In addition, Risk Level 1 projects do not have to prepare a Rain Event Action Plan (REAP) while both Risk Level 2 and 3 projects will have to prepare a REAP which is applicable to every event where there is a forecast of 50% or greater probability of measurable precipitation (0.01 inch or more). All new projects which are over 1 acre in size and which are not already covered by the current stormwater permit will have to calculate the proper classification of the project as either a Risk Level 1, 2 or 3 project. One of the main criteria for being classified as presenting a greater risk is whether the project will discharge into a stream segment which has been listed under section 303 (d) as being impaired for sediment or whether the stream is listed as having beneficial uses for cold, spawn and migratory fish habitats. The new permit requires that the SWPPP must be prepared by a Qualified SWPPP developer, which is defined as someone who is either a Professional Civil Engineer, Professional Geologist or Engineering Geologist, a Landscape Architect, a Professional Hydrologist or a Certified Professional in Erosion and Sediment Control.

The analysis in the Draft EIR does not rely on provisions of the SWMP and existing permit requirements as “mitigation” for any identified impacts. Mitigation Measures HYD-1 through HYD-7 in the Draft EIR would mitigate impacts from proposed development in the 2010 LRDP. All projects proposed under the 2010 LRDP will be analyzed individually at a project level, and will address the CCRWQCB directives in the approved SWMP. Mitigation Measure HYD-2A has been amended as follows:

LRDP Mitigation HYD-2A: The University shall install and maintain technologies effective at removing sediments and otherwise treating runoff, including Continuous Deflective Separation devices or similar technologies and methods, such as Low Impact Development techniques. Technologies selected shall reduce particulate matter. The improvements shall be implemented concurrently with the construction of individual projects.

Response to Comment A-17-HYDRO-2. Surface water quality, including water chemistry, is discussed in DEIR Section 4.7.1.7. Samples taken from the lagoon are shown in Table 4.7-1, and an evaluation of water chemistry is discussed on pages 4.7-14 to 4.7-17.
Response to Comment A-17-HYDRO-3. Table 4.7-1 is referenced in the third paragraph of page 4.7-14, immediately prior to the table.

Response to Comment A-17-HYDRO-4. The information in the comment is already presented on pages 4.7-16 and 4.7-19 of the DEIR. Impacts on biological resources due to runoff are addressed in Impact BIO-1, where it is acknowledged that most Main Campus runoff is directed to the Lagoon (DEIR, p. 4.3-32). Page 4.3-34 discusses the impact that increased sedimentation and pollutants could have on affected water bodies, and the rest of the impact discussion identifies LRDP policies and mitigation measures that would reduce the impact to a less-than-significant level.

Response to Comment A-17-HYDRO-5. Nutrient contaminants are discussed on DEIR page 4.7-16, which discloses which pollutants were tested and which exceeded federal or state standards. Bacteria in stormwater runoff is discussed on pages 4.7-16 to -17. Impact HYD-2 addresses the potential for runoff to threaten surface water quality standards, acknowledging the potential for bacteria to contribute to adverse water quality impacts. Mitigation HYD-2A has been amended as shown in response to comment A-17-HYDRO-1.

Response to Comment A-17-HYDRO-6. Please see response to comment A-17-HYDRO-5, above.

Response to Comment A-17-HYDRO-7. The text will be modified to delete “aquifer” in the first sentence, and to delete “water sources” replace it with “aquifer” in the second sentence on page 4.7-17 of the DEIR.

Response to Comment A-17-HYDRO-8. Please see response to comment A-17-HYDRO-1, above.

Response to Comment A-17-HYDRO-9. Figure 4.7-3 shows the 100-year flood zone and other features in detail. Please see DEIR Figure 4.7-3a for a legend explaining the detailed features on the map.

Response to Comment A-17-HYDRO-10. Please see response to comment A-17-HYDRO-1, above.

Response to Comment A-17-HYDRO-11. As mentioned in the Introduction to the EIR, the LRDP is a programmatic plan and does not propose construction of specific structures. For specific development proposals under the LRDP, the design and environmental review will address specific details of site design and construction site management as commenter requests. This EIR analyzes these issues at a programmatic level, however. Please see the discussion of Impacts HYD-1 (water quality impacts due to construction activities) and HYD-2 (effects of runoff from impervious surfaces on water quality). Mitigation Measure HYD-1A expressly recognizes that copper is a source of water pollution, and known copper sources will be addressed in any site-specific SWPPP. Please see response to comment A-17-HYDRO-1.

Response to Comment A-17-HYDRO-12. Please see responses to comments A-17-HYDRO-1 (amending Mitigation Measure HYD-2A) and A-17-HYDRO-4, above. Impacts HYD-3 and HYD-4 analyze impacts from increasing impermeable surfaces based on anticipated increases in area covered by buildings and paving. LRDP Policies ERO-16 through -22 and MAR-4, discussed in Impacts HYD-3 and HYD-4 require all site development under the LRDP to minimize erosion and runoff of pollutants into wetland, surface water bodies, and coastal areas. Runoff from development under the 2010 LRDP would not exceed the capacity of drainage systems, and no flooding would occur (see Impact HYD-2). Detention of stormwater to increase water quality prior to release to surface water bodies is just one of the techniques that may be used pursuant to Mitigation Measure HYD-2A and the above-cited LRDP policies.

Response to Comment A-17-HYDRO-13. Please see response to comment A-17-HYDRO-1, above. SWPPPs are prepared for every project site that is 1 acre or larger in size. The LRDP and individual projects must be evaluated and found consistent with the California Coastal Act prior to construction, regardless of CEQA mitigation and levels of significance.
Response to Comment A-17-HYDRO-14. These impacts are analyzed in the discussion of Impact HYD-2, on DEIR page 4.7-30. Amended Mitigation Measure HYD-2A (see response to comment A-17-HYDRO-1) would incorporate the suggested Low Impact Development (LID) measures, such as trash and other containments. Site-specific measures related to particular projects, will be analyzed at the time that each project developed under the LRDP undergoes project-level environmental review, and LID technologies and methods will be incorporated into each individual development consistent with the approved SWMP. Please see responses to comment A-17-HYDRO-1 (amending Mitigation Measure HYD-2A) and A-17-HYDRO-12. Bioswales are just one of the techniques that may be used pursuant to Mitigation Measure HYD-2A and the LRDP policies cited in response to comment A-17-HYDRO-12.

Response to Comment A-17-HYDRO-15. The applicable technologies to control runoff and otherwise prevent pollution on construction sites will be selected at the time a specific project is proposed. Available technologies vary widely, and their suitability for a particular site or project must be assessed once more information is available about a specific development proposal. The University must comply with existing regulations in the implementation of the LRDP, including the General Construction provisions of the NPDES program. The scope of the LRDP, EIR, and Coastal Act includes proposed development. Please see response to comment A-17-HYDRO-14.

Response to Comment A-17-HYDRO-16. The increase in impervious surfaces is quantified and addressed in Impacts HYD-3 and HYD-4. The decrease in permeable surface will not affect groundwater resources. Mitigation HYD-2B ensures that storm drain improvements will be adequately sized to convey additional runoff. Please see responses to comments A-17-HYDRO-1 (amending Mitigation Measure HYD-2A), A-17-HYDRO-4 and A-17-HYDRO-12. Permeable surfaces are just one of the techniques that may be used pursuant to Mitigation Measure HYD-2A and the LRDP policies cited in response to comment A-17-HYDRO-12.

Response to Comment A-17-HYDRO-17. Retrofitting existing drainage infrastructure may be part of future development projects whether or not there is an increase in impervious surfaces. Additionally, upgrades to campus infrastructure are proposed independent of particular capital projects such as the Campus Infrastructure Renewal Project. The environmental impacts, if any, to hydrology and water quality are considered as part of any discretionary decision related to those projects in accordance with CEQA. Mitigation HYD-2A requires installation of effective technologies to remove sediments in runoff. In requiring that storm drain systems be adequate to convey runoff, as required by Mitigation HYD-2B, the University is ensuring that any improvements occur prior to development or redevelopment activities.

Response to Comment A-17-HYDRO-18. Mitigation HYD-2A does not specifically require the use of bioswales, but requires the use of effective technologies in general. Please see response to comment A-17-HYDRO-14.

Response to Comment A-17-HYDRO-19. Please see response to comment A-17-HYDRO-1, especially regarding the campus’s participation in the RWQCB Joint Effort to prepare hydromodification criteria for development projects on campus. The discussion under Impact HYD-3 specifically addresses whether the increase in impermeable surfaces would result in lowering of groundwater levels. The discussion concludes that this impact is less than significant. Please see response to comment A-17-HYDRO-12 regarding stormwater detention. Low impact development is addressed as part of Mitigation Measure HYD-2A, discussed in Impacts HYD-2 and HYD-4, which has been revised as shown in response to comment A-17-HYDRO-1.

Response to Comment A-17-HYDRO-20. Please see responses to comments A-17-HYDRO-1, A-17-HYDRO-12, A-17-HYDRO-16, and A-17-HYDRO-19. Limiting the amount of impervious surfaces is just one of the techniques that may be used pursuant to Mitigation Measure HYD-2A and the LRDP policies cited in response to comment A-17-HYDRO-12.
Response to Comment A-17-HYDRO-21. The discussion of Impact HYD-4 includes an analysis and estimate of the proposed increase in impervious surface area under the 2010 LRDP, and the risks to specific water bodies. This analysis includes an approximate quantification of the increase in surface area (see pages 4.7-37 -40). The level of analysis is appropriate to a programmatic level of planning. More specific estimates of runoff will be performed when individual projects are proposed.

Response to Comment A-17-HYDRO-2. LRDP Policy ERO-20 is incorrectly reproduced on DEIR page 4.7-38, and will be corrected. Please refer to draft LRDP page F.14.

The wording of Policy MAR-4 was required by the California Coastal Commission to assure that proposed development would be consistent with the California Coastal Act. The University currently implements best management practices for storm water runoff. It would not be feasible to drain the entire 1,050 acre campus through bioswales or their equivalent because, among other reasons, the extensive land required to build such features is not available and would require the complete reconfiguration and reconstruction of the existing storm water drainage system.

Response to Comment A-17-HYDRO-23. As stated in the analysis of Impact HYD-7, the “cumulative scenario includes development in the watersheds of Goleta and Devereux Sloughs, including development in Isla Vista, Goleta, and the City of Santa Barbara (for the airport) as set forth in their respective General Plan or Master Plan documents, along with growth under the 2008 LRDP” (EIR, p. 4.7-43).

Please see response to comments A-17-HYDRO-19 regarding limiting impervious surfaces, and response to comment A-17-HYDRO-21 regarding surface area analyses.


Response to Comment A-17-HYDRO-25. See response to comment A-17-HYDRO-1. UCSB’s SWMP was approved in 2008 and was last revised in June of 2009. The current SWMP is available at:


4.8 Land Use and Planning

Response to Comment A-17-LU-1. Environmental impacts related to land use and associated mitigation measures are found on pages 4.8-19 to 4.18-35. Mitigation monitoring and related programs are included as part of the Final EIR. Changes in land use designations and other aspects of the LRDP would require amendment of the LRDP and would be subject to further environmental review. Changes to the physical environment over time will be considered as part of subsequent environmental analysis at the time a project is proposed.

Response to Comment A-17-LU-2. The proposed land use is shown on LRDP Figure D.2 Proposed Land Uses. Figures 3-8 through 3-14 depict the proposed land use plan, development program, housing sites, parking and circulation improvements, bicycle improvements, and open space and natural areas plan. The EIR is best read and understood in conjunction with the LRDP, which describes the proposed project in more detail. Proposed changes in land use are discussed in more detail in Section D.2 of the LRDP and on page H.2.

Response to Comment A-17-LU-3. Consistency of the LRDP with the Coastal Act is analyzed on pages D.16, E.9 to E.12, F.7 to F.15, G.3 to G.5, and H.2 to H.18 of the LRDP and Section 4.8.3 (pp. 4.8-28 to -33) of the DEIR. Pages 4.8-19 to 4.8-21 of the EIR discuss potential impacts to the County and applicable cities’ Local Coastal Programs and Local Coastal Plans and other plans. The EIR is best read and understood in conjunction with the LRDP which describes the proposed project in more detail.
Response to Comment A-17-LU-4. ESHA is defined in the Coastal Act, as explained on LRDP page F.7. ESHA areas are mapped on LRDP Figure F.7. The land uses proposed under the 2010 LRDP, including these areas, are shown on Figure D.2.

Response to Comment A-17-LU-5. Figure 4.8-1 does not delineate all jurisdictional boundaries, but displays jurisdictional ownership of various properties along with Coastal Commission oversight. Isla Vista is labeled as being under the County jurisdiction, as is Goleta Beach.

Response to Comment A-17-LU-6. As the commenter notes, the requested information is provided in Section 3.0 of the DEIR.

Response to Comment A-17-LU-7. The geographic extent of the relevant portions of the project area are shown on maps in the sections of the LRDP and EIR on land use, development, biology, geology, transportation, recreation and other areas.

Response to Comment A-17-LU-8. The County’s ownership of the Goleta Beach County Park is indicated on Figure 4.8-1 and discussed on page 4.12-14 and 4.12-15 along with the Protection Plan. Discussions regarding the Goleta Slough are principally found in sections related to the City of Santa Barbara, which is the primary land owner of the Slough and the Reserve as identified on page 4.8-6 of EIR.

Response to Comment A-17-LU-9. Figure 4.8-1 shows the community of Isla Vista, page 4.8-7 discusses Isla Vista’s major land uses, and pages B.4 to B.7 of the LRDP describe the Isla Vista Master Plan. 1993 Goleta Planning Area maps were not relied upon because they had not been updated to include the subsequent incorporation of the City of Goleta and other portions were undergoing revision at the time of the EIR’s preparation.

Response to Comment A-17-LU-10. Figure 4.8-1 shows the community of Isla Vista, page 4.8-7 discusses Isla Vista’s major land uses, and pages B.4 to B.7 of the LRDP describe the Isla Vista Master Plan.

Response to Comment A-17-LU-11. Page 4.18-13 discusses the “County Coastal Zoning Ordinance” as the implementation element of the Local Coastal Plan and assumes the Housing Element is part of the Comprehensive Plan. The Housing Element is discussed in more detail on Section 4.10 “Housing and Population.” Discussion of the Goleta community relies on adopted plans of the City of Goleta, rather than the Goleta Community Plan and discussed on page 4.8-17. The “Ellwood-Devereux Plan” is discussed on page 4.8-8 as “Joint Proposal for the Ellwood-Devereux Coast.” Discussion of the relationship between the Santa Barbara Airport and UC Santa Barbara were based on the Airport Land Use Plan as described on pages 4.8-13 to 4.8-17 because of the focus on land use rather than airport terminal and other facilities associated with the Specific Plan.

Response to Comment A-17-LU-12. The text on page 4.8.12 has been amended as follows:

The unincorporated areas surrounding the University are governed by the 1993 Goleta Community Plan. A master plan for Isla Vista was prepared by Santa Barbara County and has been submitted to the California Coastal Commission for approval.


Response to Comment A-17-LU-15. Please see the responses to letter R-26, Section 4.13, regarding off-campus parking.
Response to Comment A-17-LU-16. Because the Campus is not subject to local land use regulation, the DEIR does not consider whether development under the LRDP promotes other jurisdiction’s policies or goals. The DEIR does consider, in Impact LU-3, those policies of the Goleta Community Plan that relate directly to the Campus, and determines that the LRDP would have a less than significant in relation to those policies. No further mitigation is required.

With regard to the University’s payment of fees to local government please see the Master Response - Fiscal Impacts.

Response to Comment A-17-LU-17. Non-housing uses are proposed in University neighborhoods to provide amenities, such as snack-shops, for the residents, and to reduce transportation impacts by providing goods and services nearby and small instructional and support facilities such as seminar and computer rooms, thus reducing trips to and from the Campus. There is no substantial evidence that these local retail amenities will have a significant effect on the environment that was not analyzed in the EIR. Competition among commercial entities and the providers of these local services is a socio-economic matter not properly within the scope of the EIR. Please see Master Response – Fiscal Impacts.

Response to Comment A-17-LU-18. Uses proposed within particular land use categories are found on pages H.3 to H.5 of the LRDP.

Response to Comment A-17-LU-19. Existing height limits for residential buildings on the east side of Isla Vista are 35 feet and height limits for University development in the adjacent area are 45-feet, or 10 feet higher. Density in Isla Vista and in proposed Campus development areas are not strictly comparable because allowable housing density in Isla Vista is based on parcel size and nearly all of the University’s Main Campus is a single parcel. Nevertheless, proposed University housing is likely to be more dense than the adjacent apartments in Isla Vista which are zoned “SR-H High Density Student Residential.” This density would not, however, divide Isla Vista, as would be situated along the edge of the community and would leave any part of Isla Vista isolated from any other part.

Response to Comment A-17-LU-20. Local land use plans do not govern development of the Campus. Please see prior responses on the relationship of local government plans and the LRDP and EIR, for example responses to comments A-17-LU-2, -3, -4, -7, -9, -10, -11, -12, and -16.


4.9 Noise

Response to Comment A-17-NOISE-1. The setting discussion on pages 4.9-6 and 7 has been amended as follows:

County Roads. Santa Barbara County CEQA Guidelines consider exterior noise exceeding 65 dBA CNEL to be significant. Under existing conditions, residences in Isla Vista closest to the western segment of El Colegio Road (west of Los Carneros Road) experience average exterior traffic noise levels of approximately 67.5 dBA Community Noise Equivalent Level (CNEL). Traffic noise levels at residences in Isla Vista adjacent to the central segment of El Colegio Road (between Los Carneros Road and Stadium Road) are approximately 65.8 dBA CNEL, which is slightly above the County’s threshold. Traffic noise levels along the central segment of El Colegio Road are estimated to be somewhat lower than traffic noise levels along the western segment of El Colegio Road because of

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5 CNEL: Community Noise Equivalent Level; the average (on an energy basis) noise level measured in A-weighted sound pressure level for a twenty-four (24) hour period with different weighting factors for the noise levels occurring during the day, evening, and nighttime periods.
slower traffic speeds. The reduced average vehicle speeds are a result of the traffic lights at the intersections of El Colegio Road and Los Carneros Road, Embarcadero Del Mar and Stadium Road. Traffic noise levels at sensitive receptors along Los Carneros Road and Storke Road do not exceed the County’s 65 dBA CNEL significance threshold.

El Colegio is currently in the process of being widened from Storke to Ocean Road. The County of Santa Barbara adopted a Mitigated Negative Declaration (MND) for the El Colegio Road widening project in December 2007, and the University was a responsible agency. The MND concluded that project construction would result in temporary increases in noise levels, but that adherence to Mitigation Measure NOI-1, addressing hours of construction and location of significant noise-generating equipment, would result in less than significant noise impacts. The portion of the widening project from Camino Corto to Ocean Road is completed. The portion from Camino Corto to Storke Road is under construction. This project is not part of the 2010 LRDP, and the proposed widening project was adequately analyzed in the MND. No changed circumstance or new information is present that would alter the conclusions of the MND that the impacts related to the widening of El Colegio are not expected to be greater than what was analyzed in the environmental review for that project.

Response to Comment A-17-NOISE-2. The analytical method used to assess noise impacts in the EIR is described in DEIR Section 4.9.2.2 (pp. 4.9-16 through -21). As explained in Impact NOISE-3, beginning on DEIR page 4.9-26, the DEIR’s analytical method is sufficient to estimate impacts to sensitive receptors. Impact NOISE-3 was determined to be significant on the basis of the noise measurements and modeling that were performed. Mitigation measures NOISE-1A and NOISE-3A apply to all sensitive receptors that would be affected by development. Please see response to comment I-33-4 for changes to NOISE-3A.

Response to Comment A-17-NOISE-3. Mitigation BIO-1D requires development of project design features that will minimize noise impacts to adjacent aquatic resources. Mitigation BIO-3C requires nesting bird surveys and restricts noise producing construction activities within 200 feet of active nests. These measures, and LRDP Policies ESH -3, -24, and -25, are intended to allow LRDP implementation to occur while avoiding and minimizing noise impacts to sensitive species and habitats. ESH 25 provides a limited exception to the other policies and does not conflict with them. Taken together with these policies, the identified mitigation measures are sufficient to reduce impacts to a less than significant level. No further mitigation is required.

Response to Comment A-17-NOISE-4. Adopting standard hours restrictions would not accommodate the wide variety of campus activities and diverse sources of noise, nor account for the nature of academic communities with regard to classes, study periods, examinations, and similar normal campus functions. Therefore, the suggested restrictions are not feasible. With regard to construction noise and deliveries to the campus, however, the noise mitigation measures on DEIR pages 4.9-34 and -35 have been amended as follows:

LRDP Mitigation NOISE-4A: Equipment Maintenance. The Campus shall require that new and existing heating, ventilation, and air conditioning equipment and other commercial/industrial equipment be adequately maintained in proper working order so that noise levels emitted by such equipment remain minimal to minimize disruption to campus functions such as class times, exam times, normal sleeping hours, and to nearby residents.

LRDP Mitigation NOISE-4B: Limits on Truck Deliveries and Other Activities. The Campus shall require commercial and industrial uses in close proximity to residential areas to restrict the hours of truck deliveries and trash pickups to minimize disruption to nearby residents, where
feasible. campus functions such as class times, exam times and
normal sleeping hours, and to nearby residents.

4.10 Population and Housing

DEIR Section 4.10 was entirely replaced by revised, RDEIR Section 4.10. Accordingly, as authorized by State CEQA Guidelines Section 15088.5(f)(2), the University will respond to comments on RDEIR Section 4.10, but not to comments on RDEIR Section 4.10 which has been superseded. Please see the responses to letter R-26, Section 4.10.

4.11 Public Services

Response to Comment A-17-PUB-1. Please see the response to comment A-17-PUB-6, below.

Response to Comment A-17-PUB-2. The data the commenter references from RDEIR Section 4.10 (Table 4.10-3) was provided by the UC Santa Barbara Community Housing Office, as reported to the Office of Institutional Research.6 As can be seen in Table 4.10-3, the percentage of UCSB students living in Isla Vista has fluctuated from year to year, from 40% to 46% since the 1996-1997 school year. This percentage has remained steady at 40% since 2004-2005, most recently verified in the 2007-2008 report.7 However, using the current student body percentage living in Isla Vista as a measure of how many more students will live there in 2025 is inaccurate. All residential growth—including students, faculty, staff, and their families—proposed in the LRDP would occur on campus. Thus, while the total number of students would increase (projected at 25,000 by 2025), Isla Vista would not necessarily experience a rise in student population. This is noted in LRDP Impact PUB-2, which states: “Because population growth under the 2008 LRDP would occur almost entirely on campus, demand on other law enforcement agencies will not increase substantially.” (p. 4.11-17). Moreover, the LRDP plans to house the net growth in student population, regardless of students’ “new” or “continuing” status.

Regarding mutual service agreements between UCSB and law enforcement personnel, Impact PUB-2 (p. 4.11-7) states: “The UCSB Police Department has two mutual aid agreements with the California Highway Patrol and the Santa Barbara County Sheriff’s Department, but these agreements only represent occasional collaborations where an unusual need for assistance is required.”

Response to Comment A-17-PUB-3. The inaccuracy of the term “Orientation Weekend” rather than “Fall Orientation Period” is noted, although nowhere in the Public Services section is the term “Orientation Weekend” used. Demand for law enforcement services on campus and in Isla Vista fluctuates during the year; the commenter is correct that demand is higher during the fall quarter than at other times. As discussed in Impact PUB-2, the new Isla Vista Foot Patrol station, along with existing facilities and UC police facilities to be housed in buildings developed under the LRDP, will be sufficient to house any new personnel required to meet increased. Thus increased demand for law enforcement, including fall quarter demand, will not require the construction of new or expanded facilities beyond what is discussed in the DEIR.

Response to Comment A-17-PUB-4. The following is an excerpt from page DEIR 4.11-1:

The UCPD is currently staffed with 31 uniformed patrol officers. UCPD also provides emergency medical response through their 24-hour operation known as Rescue 7. For Rescue 7 operations the UCPD maintains a staff of three paramedics and thirteen student emergency technicians. The UCPD provides emergency medical services for all of campus and the Isla Vista community. UCPD also operates the Community Service Organization (CSO). There are currently 50 student CSO members who patrol on bicycles and report emergencies, provide safety escorts, perform security checks, instruct the University community on bicycle safety, and report to the UCPD.

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6 Data is compiled into annual “Campus Profile” reports, available here: http://bap.ucsb.edu/IR/campus-profiles.html.
More information regarding UCPD’s service capabilities is recorded in the 2007 Annual Report & Crime Statistics for UC Santa Barbara, summarized here:

**Patrol Division**: The patrol unit provides 24-hour coverage of all areas of the University. (As noted in the DEIR, the UCPD's jurisdiction extends one-mile off campus.) Officers provide preventive patrols on foot, bicycle, and motor vehicles, receive and process complaints by citizens, respond to emergencies, arrest offenders, appear in court, provide traffic control and enforcement, attend community meetings, and other miscellaneous matters.

**Rescue Unit**: The Rescue unit provides a 24-hour paramedic service for the campus and surrounding community. The unit is staffed with full-time paramedics and part-time emergency medical technicians (which are also students). The unit teaches CPR classes to campus departments and to the public. The unit also participates in training seminars and supports the County’s annual Emergency Medical Services Conference. The unit responded to 643 medical calls in 2007.

**Rape Prevention & Education**: The Rape Prevention and Education Program (RPEP), sponsored by the UCPD and UCSB Women’s Center, works to educate the campus community about sexual assault prevention, and also give counseling and aid to survivors. The program offers workshops, discussions, and seminars on campus and in the surrounding community.

**Investigations Unit**: The investigations unit provides advanced services such as criminal investigation, crime prevention, personal safety, dignitary protection, and liaison to outside agencies. The unit’s supervisor handles hiring for UCPD’s officers.

**Crime Prevention & Training**: The crime prevention and training unit handles the training of UCPD staff, coordination of crime prevention programs, bicycle safety, approval of campus alarm systems, electronic access control, and other projects. The unit includes a position for public information officer, handling public relations.

**Community Service Organization**: The community service organization (CSO) consists of University students who work with the UCPD officers in serving the campus. As noted in the DEIR, there are approximately 50 students who work with the CSO, performing service such as personal safety escorts, security checks, the detection of safety hazards in residence halls, bicycle safety education, licensing, and enforcement. As the on-campus population has increased, the CSO program has increased in usage.

**Isla Vista Foot Patrol**: The IV Foot Patrol is addressed in the DEIR. Please see responses to comments PUB-5 through -9, below.

**Records Unit and Communications Unit**: Both the records unit and communications unit provide backup support and resources for the UCPD, including management of information collected by personnel, dispatch service, reception of calls from public, the monitoring of alarm systems, and maintenance of crime and traffic data.

As far as facilities and equipment are concerned, Impact PUB-1 (p. 4.11-16) states the following:

*The UC Santa Barbara Police Department does not use service ratio targets to determine the level of needed enforcement. The Department is currently staffed with 31 uniformed patrol officers, 3 paramedics, 13 emergency technicians, and 50 patrolling student assistants.*

*The proposed increase in on-campus population (5,000 students and approximately 1,700 faculty and staff by 2025) will increase the demand on the UC Santa Barbara Police Department. Because new enrollment and employment growth will be housed and primarily occupied on campus, the greatest need for additional police services is anticipated to occur on campus. The current facilities that are occupied by the UC Police have been identified as inadequate to meet the current needs of the Department. The main squad room is shared by all 23 uniformed officers and currently operates*
as a multipurpose room. This arrangement is compromising the Department’s operations. A satellite office is proposed in Building 300, but this space will not be enough to adequately address the Department’s space needs.8

Under the LRDP, there are 115,000 assignable square feet of building space devoted to public services. A portion of this would be allocated for law enforcement. Construction of the new facilities is not anticipated to have significant impacts on the environment, and is covered in the other sections of this EIR (Sections 4.3, 4.4, 4.5, 4.6, 4.7 and 4.14). Impacts are less than significant.

As explained in Impact PUB -1, beginning on DEIR page 4.11-16, the LRDP provides for the development of facilities to house personnel to meet increased demand for these services. Any environmental impacts related to such increased demand would be less than significant.

Response to Comment A-17-PUB-5. The DEIR acknowledges at page 4.11-7 that an increased campus population would increase demand for law enforcement in Isla Vista. Under CEQA, such increased demand is not by itself an environmental impact requiring analysis and mitigation. Rather, the CEQA analysis must determine whether increased demand would necessitate new or physically altered facilities the construction of which could cause significant environmental impacts. CEQA Guidelines, Appx. G, § XIII.

As explained in Impact PUB-2, beginning on DEIR page 4.11-19, the Isla Vista Foot Patrol will soon relocate to a new facility, planned and constructed separately from the LRDP, which will be large enough to accommodate all personnel required to meet increased demand for law enforcement services. Thus, any increase in demand attributable to development under the LRDP will not require new or expanded facilities and will have less than significant environmental impacts. The additional data requested by the commenter is not relevant to this analysis.

Response to Comment A-17-PUB-6. Regarding Campus’s fiscal contribution to the Isla Vista Foot Patrol, please see the Master Response - Fiscal Impacts. Please also see response to comment A-17-PUB-5 regarding CEQA’s requirements for the analysis of environmental impacts related to law enforcement.

Response to Comment A-17-PUB-7. At the time of DEIR preparation, the 2004 crime statistics disclosed pursuant to the federal Clery Act were the most current available. At the time of this writing, 2006 statistics are available at the UCSB Division of Student Affairs website.9 While 2007 statistics are available at the UCPD Annual Report & Crime Statistics website, they do not include Isla Vista.10 The statistics from 2006 include crimes reported in Isla Vista, shown in the following table:

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8 Source: Officer Matt Bowman, UC Santa Barbara Police Department. Telephone conversation—October 17, 2007.
<table>
<thead>
<tr>
<th><strong>2006 Clery Report Statistics - Isla Vista</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Murder/Non-Negligent Manslaughter</td>
</tr>
<tr>
<td>Negligent Manslaughter</td>
</tr>
<tr>
<td>Forcible Sex Offenses</td>
</tr>
<tr>
<td>Non-Forcible Sex Offenses</td>
</tr>
<tr>
<td>Aggravated Assault</td>
</tr>
<tr>
<td>Robbery</td>
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<tr>
<td>Burglary</td>
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<tr>
<td>Larceny-Theft</td>
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<tr>
<td>Vehicle Theft</td>
</tr>
<tr>
<td>Arson</td>
</tr>
<tr>
<td>Hate Crimes:</td>
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<tr>
<td>Race</td>
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<td>Gender</td>
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<td>Sexual Orientation</td>
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<td>Liquor Law Arrests</td>
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<td>Liquor Law Referrals</td>
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<tr>
<td>Drug Law Arrests</td>
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<tr>
<td>Drug Law Referrals</td>
</tr>
<tr>
<td>Weapons Laws Arrests</td>
</tr>
<tr>
<td>Weapons Laws Referrals</td>
</tr>
</tbody>
</table>

Please refer to response to comment A-17-PUB-5, above, regarding the relationship between demand for law enforcement, staffing levels, and environmental impacts.

**Response to Comment A-17-PUB-8.** The citation for the officer-to-population target ratios is page 4.15-3 of the Faculty and Family Student Housing, Open Space Plan, and LRDP Amendment EIR of 2006 (State Clearinghouse No. 1996111063).

The fact that UCSB owns properties within the community of Isla Vista and they receive law enforcement support from the Sheriff’s Department is acknowledged.

As discussed in the response to comment A-17-PUB-5 above, the DEIR concludes that increasing IVOF staffing to meet increased demand for law enforcement will not have significant environmental impacts. Thus, the IVPF’s current staffing level and its responses to calls for service at University-owned properties are acknowledged by the Campus, but are not relevant to the analysis in the DEIR.

**Response to Comment A-17-PUB-9.** The commenter’s statement that the LRDP proposes only 3,650 new parking spaces is incorrect. As the following excerpt from the Project Description section (p. 3.0-39) it explains:

“The LRDP proposes the construction of a total of 8,613 parking spaces to support the academic program and campus population. This includes:

- 2,800 replacement parking spaces on the Main Campus,
- Approximately 100 net new parking spaces on the Main Campus,
- 2,930 parking spaces on the Main Campus to serve planned housing, and
• 2,883 parking spaces on the other campuses to serve planned housing.

Parking would be provided at a ratio of one parking space per four beds for single students. Parking for student families, faculty and staff would be provided at an average of 1.5 parking spaces per unit.”

Because the first parking component listed (the 2,800 replacement parking spaces on the Main Campus) would serve to replace existing parking spaces, the plan would provide 5,913 net new spaces on campus, for both student, faculty, and staff commuters, as well as campus residents. The impact of on-campus parking demand is discussed in the Transportation and Circulation section (p. 4.13-134), quoted here:

Based on the Spring 2007 parking survey, the main campus provides approximately 6,700 parking spaces designated for faculty, staff, students, resident students, visitors, vendors, etc. During the peak hour for parking demand (2:00 – 3:00 pm) on a Tuesday, Wednesday, and Thursday, approximately 60 percent of faculty parking spaces were utilized, 85 percent of staff spaces were utilized, 50 percent of student and visitor parking spaces were utilized, and 85 percent of resident student parking spaces were utilized. No parking designation had a utilization exceeding 90 percent except for vendor parking, in which more vendors were parked than spaces provided.

The commenter points out that the Santa Catalina housing component would add 600 beds, but no additional parking, and that this, in conjunction with other campus growth, would cause more parking in areas off campus, namely, on-street parking. To address the parking impact to Isla Vista, LRDP Impact TRAFFIC-10 states the following (p. 4.13-135 [emphasis added]):

To eliminate UC Santa Barbara faculty, staff, and student parking in Isla Vista, a resident parking permit and enforcement program should be implemented in Isla Vista. Sections of on-street parking would be restricted to Isla Vista residents by providing permits to residents. The remaining on-street parking would be metered to avoid long-term parking by UC Santa Barbara faculty, staff, or students. Santa Barbara County has attempted to implement a parking permit program in Isla Vista over the past several years. If a parking permit program can be approved by the appropriate agencies, such as the County and Coastal Commission, UC Santa Barbara would pay its proportionate share to fund the plan. Because the parking permit program is outside the responsibility and jurisdiction of UC Santa Barbara, this impact is considered significant and unavoidable.

Response to Comment A-17-PUB-10. The DEIR considers the increased demand on the Sheriff’s Department, and concludes that increased demand for these law enforcement services will not cause a significant effect on the physical environment. No mitigation is required.

Response to Comment A-17-PUB-11. Please see response to comment A-17-PUB-10.

Response to Comment A-17-PUB-12. The new substation, which is not a part of the LRDP, will house the Isla Vista Foot Patrol, including any increase in staffing required to meet demand caused by growth under the LRDP. The LRDP thus will have no significant effect on the physical environment related to law enforcement. No mitigation is required.

Response to Comment A-17-PUB-13. The DEIR accounts for the Fire Department’s role as CUPA in the Hazards and Hazardous Materials section (p. 4.6-4), excerpted here:

The study area lies within the jurisdiction of the Santa Barbara County Fire Department, Fire Prevention Division, which is the CUPA for the region. (The CUPA is the County’s local agency that has been certified by Cal EPA to enforce hazardous materials/waste regulations.)

In cooperation with the CUPA, the University has adopted and implements a Hazardous Materials Business Plan. In the end, all of the University’s hazardous materials programs are overseen by the CUPA because they are responsible for reviewing the University’s plan and for performing site inspections on the campus. The CUPA also
inspects the campus, through random “spot checks,” for hazardous material inventories (more information on this below).

And also on page 4.6-10:

*Since 2001, the University has been subject to inspections from the CUPA. The CUPA is contracted to inspect the University’s hazardous materials managing practices every three years. Inspections since 2001 have identified only labeling and improper storage violations for hazardous materials containers.*11 The CUPA anticipates that its inspections of the University will increase to four times a year.12

The County Fire Department’s role is further acknowledged in Impact HAZ-8.

In 2006, Station 17 (the station which serves the campus and Isla Vista area) responded to a total of 917 calls.13 Two-hundred and ninety-four of those calls (32.06%) were attributable to the campus population (including University-owned land). Four-hundred and thirty-six calls were from Isla Vista (47.55%), and 187 were from other County areas (20.39%). Therefore, approximately 32.1% of Station 17’s call response burden is attributable to the University.14 It is reasonable to assume that the percentage of University-related calls will increase as the population on campus increases. As the DEIR acknowledges, this may require new or expanded facilities (DEIR, page 4.11-19).

**Response to Comment A-17-PUB-14.** Impact PUB 3, beginning on page 4.11-18, acknowledges that increased demand will require additional staffing, largely to meet the needs discussed in the comment. This increased staffing, in turn, will require new or physically altered facilities that, as the DEIR notes, could have impacts on the physical environment. The DEIR concludes that impacts related to fire protection are significant and unavoidable.

**Response to Comment A-17-PUB-15.** UCSB recognizes that the Santa Barbara County Fire Department may need to plan for a new fire station to serve cumulative development within the vicinity of the campus. UCSB will continue to work cooperatively with the Santa Barbara Fire Department to identify a suitable site for a new fire station, when needed. The issues of funding for the construction and operation of a new fire station and acquisition of land for a new fire station to service the UCSB vicinity are socio-economic issues to be addressed by the Santa Barbara County Fire Department and other public and private parties in the service area, and are not considered physical effects on the environment under CEQA. In recognition of the need for additional fire protection facilities to serve the area, UCSB has entered into discussions with the Santa Barbara County Fire Department regarding a campus commitment to make available a parcel of land on the UCSB campus for a future fire station. Any subsequent actions regarding the use of campus land for a new fire station would be subject to environmental review.

4.12 Recreation

**Response to Comment A-17-REC-1.** A footnote has been added to the following sentence on page 4.12-1: “Populations not affiliated with the University currently use and will continue to use campus recreational facilities.” The new footnote reads:

Use of campus facilities may require payment of both parking and facility use fees by off-campus populations.

13 Source: Telephone conversation with Johnson, Martin, Captain in Land Use Sector of the Santa Barbara County Fire Department (November 15, 2007).
14 Students living in Isla Vista do not contribute toward the University’s share of the burden, since they are residents of the County.
Response to Comment A-17-REC-2. Page 4.12-14 of the DEIR is amended as follows: The sentence is stricken from the paragraph.

The majority of LRDP related impacts are expected to occur on campus, since students, staff and faculty are most likely to use these resources on a regular basis.

The DEIR addresses off-campus recreational facilities in Impacts REC-2 and REC-4. Regarding the percentage of students living on and off campus, please see amendments made to Section 4.10 in response to comment A-17-POP-4, below.

Response to Comment A-17-REC-3. Existing recreational facilities on campus have unused capacity. DEIR Section 4.12 summarizes the extensive recreational facilities, including stadiums, gymnasiums, tracks, courts, and pools. Many existing recreational programs and facilities have capacity for increased and more intensive use, for example by scheduling for longer hours, reducing periods of non-scheduled use, and by opening facilities during non-peak periods such as term breaks and summer months. In addition, the miles of ocean beach and hundreds of acres of open space are available for more passive recreational use than they presently receive. In fact, the ratio of open space acreage to population is, and will continue to be following LRDP build-out, well above the ratio that is generally required of new development projects in the Coastal Zone. The Campus’s unused capacity will help meet the increased demand from the new Campus population added under the LRDP. Therefore, in order to accommodate new demand, the LRDP does not need to add recreational facilities in precise proportion to population growth.

Recreational opportunities at UC Santa Barbara include more than the proposed increase in 4 acres additional play fields which is reflected in changes to campus land use. DEIR Section 4.12 summarizes the extensive recreational facilities, areas, including stadiums, gymnasiums, tracks, courts, and pools. Many existing recreational programs and facilities have capacity for increased and more intensive use irrespective of changes in population, for example by scheduling for longer hours, reducing periods of non-scheduled use, and by opening facilities during non-peak periods such as term breaks and summer months. In addition, the miles of ocean beach and hundreds of acres of open space are available for passive recreational use in amounts and types well beyond what is conventionally considered to be required for approvals of development projects in the Coastal Zone.

Response to Comment A-17-REC-4. The two missing coastal access point in Figure 4.12-6 (not 4.12-3) are noted in the document Changes to Draft EIR Text.

Response to Comment A-17-REC-5. The following text has been added to the discussion on page 4.12-19:

The pertinent community plan for the project and study areas is the Goleta Community Plan. Parks are also addressed in the Isla Vista Master Plan. Relevant policies of the Goleta Community Plan include the following:

- Policy PRT-GV-1: Diverse outdoor and indoor recreational opportunities shall be encouraged to enhance Goleta's recreational resources and to ensure that current and future recreational needs of residents are met.

- Policy PRT-GV-2A: The County Parks Department and other agencies or groups pursuing implementation of the trail system shall use the Goleta Trails Implementation Study and its trail siting and design guidelines to guide future trail development and implementation.

- Policy PRT-GV-2D: Priority for future trail acquisition and implementation shall include, but not be limited to, the following trail categories expressed in descending order of priority:
  - Category 1: Fremont\Slippery Rock Trail
  - Category 2: Urban Trails not likely to be acquired through the discretionary permit process
- Category 3: San Marcos Pass Trail
- Category 4: Farren Trail

- Policy PRT-GV-5: The County shall actively pursue acquisition of interconnecting useable public trails within designated trail corridors through negotiation with property owners for purchase; through exchange for surplus County property as available; or through acceptance of gifts and other voluntary dedications of easements.

- Policy PRT-GV-7: In developing and maintaining the trail system, provision shall be made for the following:
  - appropriate trail signage at all major trail heads and signs or markers on public recreational trails;
  - the maintenance of the trail system in Goleta;
  - adequate trailhead parking;
  - consideration should be given to the use of Old San Marcos Pass Road for trail heads; and
  - Minimization of erosion on trails, particularly those located near creeks and riparian corridors.

- Policy PRT-GV-13: Properties with the potential for maximum community use shall be considered a high priority in park acquisition decisions. This includes parcels which are highly visible (e.g., open space lot on heavily used traffic corridor) or are accessible to many people (e.g., park along bike path or at trailhead), or serve people in ways beyond accessibility (e.g., parcel which supports a produce stand).

- Action PRT-GV-13.1: The County shall explore the feasibility of entering into Joint Use Agreements with schools for public use of school recreation facilities when school is not in session.

- Policy PRT-GV-14: Acquisition of open space and passive recreational opportunities shall be based upon the following factors (not listed in order of importance):
  - parcels with good passive recreational opportunities;
  - parcels with good visual qualities;
  - parcels with significant natural resources;
  - parcels with significant physical constraints; and
  - parcels which provide opportunities for public beach access.

- Policy PRT-GV-15: There shall be no motorized off-road recreational vehicle sites within the Goleta Planning Area.

Response to Comment A-17-REC-6. See Master Response – Housing and Population.

Response to Comment A-17-REC-7. The restroom at the West Campus Bluffs is a proposed project under the LRDP. As stated in the discussion of Impact REC-1, impacts of proposed recreational facilities are addressed throughout the LRDP and in the EIR in Sections 4.2 and 4.9 (see DEIR, p. 4.12-25).

Response to Comment A-17-REC-8. Impact REC-2 addresses the recreational impacts of additional population off-campus. Mitigation REC-2B requires continual maintenance of beach access points. For fiscal impacts, please see the Master Response to Fiscal and Social Impacts.

Response to Comment A-17-REC-9. Please see response to comment A-17-REC-8, above.

Response to Comment A-17-REC-10. Please see response to comment A-17-REC-8, above.
4.13 Traffic

DEIR Section 4.13 was entirely replaced by revised, RDEIR Section 4.13. Accordingly, as authorized by State CEQA Guidelines Section 15088.5(f)(2), the University will respond to comments on RDEIR Section 4.13, but not to comments on RDEIR Section 4.13 which has been superseded. Please see the responses to letter R-26, Section 4.13.

4.14 Water

DEIR Section 4.14 was entirely replaced by revised, RDEIR Section 4.14. Accordingly, as authorized by State CEQA Guidelines Section 15088.5(f)(2), the University will respond to comments on RDEIR Section 4.14, but not to comments on RDEIR Section 4.14 which has been superseded. Please see the responses to letter R-26, Section 4.14.

4.15 Wastewater

The County did not comment on this section of the DEIR.

4.16 Other Utilities

Response to Comment A-17-UT-1. The Recycling subsection of Section 4.16.1.2 will be amended as follows:

**County of Santa Barbara Goleta Community Plan.** Although UC Santa Barbara is not within the jurisdiction of the County, equivalent waste diversion goals were adopted by the University in the University of California Policy on Sustainable Practices. The following policies are included in the Resource Recovery section of the Goleta Community Plan (pp. 129-130):

**Policy RRC-GV-1:** Opportunities for community wide resource recovery and conservation shall be provided.

- **Action RRC-GV-1.1:** The County shall continue to implement and increase a curbside recycling program in the residential areas of the Goleta Planning Area. Curbside recycling shall be required for all new development and encouraged in current housing as determined appropriate by the County Public Works Department.

- **Action RRC-GV-1.2:** As funding becomes available, the County shall pursue an aggressive residential, commercial, and industrial recycling program throughout the Goleta Planning Area. All new residential, commercial, and industrial development as well as current housing shall be required to participate in these efforts as determined by the County Department of Public Works.

**Policy RRC-GV-2:** All new residential development in the Urban area and, where feasible, outside the Urban area shall participate in yard waste collection programs as may be provided by the County of Santa Barbara. Such programs may include yard waste accumulation bins, curbside pickups and backyard composting.

- **Action RRC-GV-2.1:** As funding becomes available, the County Solid Waste Division shall actively pursue the development of a yard waste collection program or siting of accumulation bins within existing neighborhoods.
Policy RRC-GV-3: Recycling bins shall be provided at all construction sites to minimize construction-generated waste which goes to the landfill.

Sections 4.3 and 4.7 include mitigation that would apply to the siting of any facility and potential impacts to biological and hydrological resources. Please see Impacts BIO-1 and HYD-1 for further information.

Response to Comment A-17-UT-2. The source for the statement regarding an estimated 18 years left of capacity for the Tajiguas Landfill was Imelda Cragin, of the County Public Works Department. However, with the newer information provided in the County comment letter, Section 4.16.1.2 (DEIR, p.4.16-2) will be changed as follows:

Based on current solid waste disposal trends, it is anticipated that the recent landfill expansion will provide approximately 184 years of solid waste disposal capacity.

Also, the text in the discussion of Impact UTIL-1 (DEIR, p. 4.16-15) will be changed as follows:

As stated in the Setting section, above, the expansion of the landfill approved in 2003 is expected to accommodate increased disposal for about 184 more years but did not account for the additional contribution from buildout of the 2010 LRDP. Implementation of the programs and facilities recommended by the Multi-jurisdictional Solid Waste Task Group would extend the remaining life the Tajiguas Landfill from about 184 years to about 41 to 53 years which is beyond the timeframe for buildout of the 2010 LRDP. […]

The statement regarding regional diversion rate (DEIR, p. 4.16-2) will be corrected as follows:

Currently, official landfill diversion for the region is approximately 55.6%.

Response to Comment A-17-UT-3. As stated in the discussion for Impact UTIL-1, UC Santa Barbara’s waste stream would increase by approximately 13.2% at buildout of the LRDP (2025), for a total of 3,729 tons of solid waste per year. Based on this reasoning, the waste stream to Tajiguas Landfill would likely not increase by 4,000 tons per year from the University. Also, a 1% decrease in waste diversion would only reduce the total diversion rate to 63% (unofficially to 68%). As noted in the DEIR, this is a significant and unavoidable impact.

Response to Comment A-17-UT-4. Mitigation for Impact UTIL-1 will be amended as follows:

LRDP Mitigation UTIL-1C: The University shall achieve a waste diversion rate of 75% by 2012.

LRDP Mitigation UTIL-1D: The University shall ensure waste and recycling facilities are adequate for both temporary and operational waste from LRDP-related growth.

Response to Comment A-17-UT-5. The three proposed cell towers are not proposed part of the 2010 LRDP, and will therefore undergo separate environmental review.

Response to Comment A-17-UT-6. Impact UTIL-1 was determined to be significant and unavoidable due to the following:

“…implementation of these improvements require the approval of multiple jurisdictions including Santa Barbara County and are therefore not within the authority of the University to implement. In the absence of these improvements, the cumulative contribution of solid waste resulting from buildout of the University in accordance with the 2008 LRDP may exceed the capacity of the Tajiguas Landfill.”
The impact is considered significant regardless of what specific thresholds the County uses since it is not within the power of the University to implement the measures which would reduce the production and disposal solid waste, beyond the measures which it can implement within its own jurisdiction.

Although the DEIR places additional requirements on the LRDP, the suggestions to incorporate solid waste policies into the LRDP are forwarded to the University.

Response to Comment A-17-UT-7. Mitigation UTIL-1A requires the University to continue present recycling and waste diversion programs. Impact UTIL-1 discusses estimated waste generation for campus growth. Please see page 4.16-15. While the DEIR does not estimate waste generation according to academic space and residential uses explicitly, it does so by using a factor which captures the resources supporting the size of the University: the number of students enrolled. This factor is not meant to be a literal estimation of how much waste each student generates, but rather as a metric for size and future growth of the University, capturing all the waste generated from the facilities that support the 20,000 students.

Mitigation for UTIL-1 will be amended as follows:

**LRDP Mitigation UTIL-1E:** All construction implementing the LRDP must conform to AB 2176 requiring equal and adequate space provided for both solid waste and recycling in new facilities. The University shall manage and coordinate an integrated waste management program to:

- Implement a greenwaste composting program for landscaping and vegetation management;
- Increase recycling facilities and programs;
- Compost foodwaste;
- Use recycled and recyclable materials for all University activities and functions, to the extent feasible;
- Provide adequate facilities to support the proposed sustainability goals of the University; and
- Recycle 75% of all construction and demolition waste.

Response to Comment A-17-UT-8. Waste generated from construction and demolition is discussed in Section 4.16.1.2, “Construction/Demolition Waste (C&D).” The current practice is to recycle most of the waste generated from these activities. The University has a contract with Marborg Industries to accept and recycle building/demolition materials from the campus (DEIR, p. 4.16-5). The diversion rate is included in the diversion rate for the entire campus. Please see amended mitigation above.

Response to Comment A-17-UT-9. Comment noted.

5.0 Alternatives

The DEIR does not eliminate from consideration the No Project alternative. It is discussed at length in Section 5.2.1, with an impact analysis. The DEIR concludes that section by noting that the No Project alternative would not achieve project objectives, and is therefore infeasible. The alternative is also included in Table 5.0-1 (p. 5.0-5), the Summary of Alternatives Analysis.

Each alternative is evaluated on its own merits, and in comparison with every other alternative. Please see Table 5.0-1. As far as the discussion of the Reduced Enrollment alternative, please read Section 5.2.2. The 3,000 additional students would bring the enrollment capacity of the University to 23,000. This would be in addition to the current enrollment capacity of 20,000. However, this does not mean that, within a range of circumstances, the University could not enroll more than 23,000 students. Although the University would not be able to build for a student population beyond that number, it could still enroll more students and operate
over capacity. In any given school year, the number enrolled could be under or above capacity, due to fluctuations in the rate of offers of admission to actual students admitted.

CEQA requires no predetermined length of discussion for alternatives. According to CEQA Guidelines Section 15126.6(a), “there is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.”

Table 5.0-1 will be amended as follows:

<table>
<thead>
<tr>
<th>Key</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>U</td>
<td>Significant and unavoidable</td>
</tr>
<tr>
<td>S</td>
<td>Significant, but mitigable</td>
</tr>
<tr>
<td>LS</td>
<td>Less than significant</td>
</tr>
<tr>
<td>+</td>
<td>Alternative would result in impacts more adverse than proposed project</td>
</tr>
<tr>
<td>=</td>
<td>Alternative would result in impacts similar to the proposed project</td>
</tr>
<tr>
<td>—</td>
<td>Alternative would result in impacts more less adverse than proposed project</td>
</tr>
</tbody>
</table>

The proposed alternative regarding acquisition and renovation by the University in Isla Vista would take property off of the County tax rolls, would not reduce any of the significant impacts of the proposed 2010 LRDP, and would still involve a lag time, of perhaps longer than four-years, to gain approval. The proposed alternative involving housing more than 100% of new 2010 LRDP students, faculty and staff would not be feasible because it would further delay housing the new 2010 LRDP growth. Neither of the proposed alternatives is needed to mitigate any significant impact of the 2010 LRDP, because 100% of new students, faculty and staff are proposed to be housed.

6.0 Growth-Inducing

Response to Comment A-17-CEQA-1. Specific comments are addressed in the following responses.

Response to Comment A-17-CEQA-2. The program of University housing proposed in the 2010 LRDP is informed by past deficiencies in the housing supply for students in all stages of their education at the University. The mix of housing proposed in the LRDP addresses freshman, upperclassmen, and graduate students, including those with families. The amount of housing proposed will accommodate all net new growth proposed under the LRDP. The EIR does not base its conclusions on whether the existing conditions related to University housing are improved; rather, whether the impacts of proposed growth are addressed. The composition of students which would be housed on campus is irrelevant for determining growth impacts related to housing and population. Irrespective of where freshmen live, which type of housing continuing students favor, or how many student families there are, the LRDP proposes to house all net new population growth.

Response to Comment A-17-CEQA-3. The analysis of cumulative impacts in this EIR accounts for future growth as proposed in the existing plans of the City of Goleta, City of Santa Barbara, and the County, in addition to proposed 2010 LRDP growth. Whether these plans were prepared with or without consideration of University growth is not pertinent to the analysis, because this EIR has analyzed University growth in addition to planned regional growth in these other jurisdictions.

Please see the cumulative impact sections of each of the substantive topical areas mentioned for discussions on induced growth. Also, please see the Master Response - Fiscal Impacts. On the whole, secondary growth is within the historical growth rates of the City of Goleta, the City of Santa Barbara, and the County as represented in the existing general plans of those jurisdictions.

Response to Comment A-17-CEQA-4. Please see response to comment A-17-CEQA-3. Growth proposed by the LRDP would not result in conversion of currently designated agricultural land.
Response to Comment A-17-CEQA-5. Please see RDEIR Section 4.10, Population and Housing, for discussions of commuting characteristics (p. 4.10-35)

Response to Comment A-17-CEQA-6. The Air Quality Section has been revised and recirculated to address global warming, providing a comprehensive and quantified discussion of greenhouse gas emissions. Please see RDEIR Section 4.2 Air Quality.

Response to Comment A-17-CEQA-7. See response to comment A-17-CEQA-6.

Response to Comment A-17-CEQA-8. Impact POP-4, analyzed in RDEIR Section 4.10 Population and Housing, has been determined to be significant and unavoidable. Please see subsection 4.10.2.4 for a discussion of secondary growth impacts.
Comments and Responses on Draft EIR - Individuals
June 23, 2008

Via email info@ucesbvision2025

Office of Campus Planning & Design
C/o Vision 2025
University of California, Santa Barbara
Santa Barbara, CA 93106-1030

Dear Sir/Madam:

We are the owners of an adjacent STORKE CAMPUS property commonly known as 6789 Sweetwater Way. Like many of the owners along the Sweetwater Way corridor, we are the original owners who purchased in 2000.

We made our decision to purchase in the location we did with financial backed expectations of what we saw is what we were buying into in terms of the adjacent Storke Campus. After reviewing the Draft E.I.R. and attending a University Outreach meeting in April 2008, the following are our comments:

We support the Reduced Project Alternative and believe the Draft E.I.R. is inadequate for both the decision makers and public. For the sake of brevity, this letter will focus on environmental comments relative to the Storke Campus:

The programmed E.I.R. is a CEQA blank check to scope a “bubble/concept” project, but lacks specificity as to what exactly is the project. For example, the programmed E.I.R. states that this document (EIR/LRDP) does not provide that the project is either funded or will be constructed. However, assuming based on our concerns or fears we decide to move, how do we disclose to a future buyer of what and when the project might be built. At this point all we could say is “maybe” to which a buyer would discount a purchase due to inherent risk. Thus the E.I.R. has differed mitigation and failed to sufficiently define the project. For example, the single family residence adjacent to Storke Ranch, are these detached residences? At the April 2008 Outreach meeting, University representatives were uncertain if the new housing would include title roofing, yet the university brochures include a red-tiled building footprint.

Land Use:

The single family Storke Campus single family proposes 37 units along the Storke Ranch corridor that contains 17 units. This is double the density and the proposed use is incompatible with the adjacent existing land use. The increased density within the Storke Campus results in proposed land uses that migrate closer to the westerly property line that intrudes beyond the existing Storke Campus building footprints (buildings 776, 794, 795, 796 & 798).
Biological Resources:

Biological Resources No. 3 states no trees will be removed that contain nesting endangered or nesting raptor species; however, there is no attempt to provide the baseline data for where these trees may be located and there is no discussion that they might be incorporated into the project design.

Aesthetics:

There are two specimen Eucalyptus trees that are approximately 40-inch diameter which are also skyline trees and we have observed to contain two hawks and also two owls. The trees are located westerly of building 776 and westerly of the maintenance yard fenced area of Storke Campus. There are numerous mature palms and sycamores that the E.I.R. is silent if they are to be incorporated into the design or part of the demolition/reconstruction process.

Presently, there is a 45-foot buffer from the Storke Campus westerly exterior property line. This buffer should be maintained by either a greenbelt or the existing perimeter service road. Assuming the perimeter service road is left in place the Storke Campus single family entrances should face on the perimeter road and maintain compatible development within the existing Storke Campus building footprint string line.

Solar Access:

It is unclear what is being proposed within the single family Storke Campus corridor. Again from a financial based expectation perspective we are concerned that our south facing solar access will be denied based on the proposed development and the proximity to the western property line. Thus the greenbelt/buffer insures that the rear portions of the Storke Ranch Sweetwater Way corridor will not be shadowed on denied solar access to the properties. We have studied, priced and plan to install a photovoltaic grid tie-in on our home.

As a general comment I was surprised to learn that the Storke Campus Housing was constructed between 1970-1972. Even more surprising that some of the housing is within the 100-year flood elevation and the entire site will be demolished and reconstructed. This does not seem a very good return on tax payer dollars to demolish an apartment complex that if a private business would not have attained the term under the IRS guidelines for asset depreciation.

Thank you for the opportunity to comment on the LRDR/EIR and trust the suggestion offered in the correspondence will be incorporated into the decision makers’ vote for the Reduced Project Alternative.

Sincerely,

Eliane Yochum

Joseph Patrick Yochum
Response to Comment I-1-1. The EIR is program-level because the LRDP is itself a program. The LRDP does not propose specific projects: it is a long-range planning tool, and specific projects will be subject to project-specific environmental review as they are proposed and permitted. The EIR analyzes the program that is proposed by the LRDP, but does not analyze in detail specific housing projects because these projects are not proposed in detail. Subsequent environmental analysis at the time of specific project proposal will address issues such as roofing materials and whether housing will be detached or attached. Where specific impacts have been identified, the discussion of mitigation is as specific as possible. In other cases, mitigation measures provide performance standards that will allow the identification of more specific measures as specific projects are proposed and analyzed. This is in compliance with CEQA Guidelines §15168.

The LRDP analyzed in the DEIR is based upon a finite project description with limitations on area, square footage, building height and living units. These are fundamental parameters within which the LRDP can be developed. The specifics of design, building placement (within small, identified building envelopes) will be developed later, and subject to further environmental review.

Response to Comment I-1-2. The plans for Storke Campus housing include a 20-foot height limit on the western periphery, minimizing the change in character from single-family homes in the Storke community to condominiums and apartments on the campus.

Impacts associated with Storke Campus proposals are addressed under Impact AES-4. Mitigation AES-4 will be amended as follows to address the transition to neighboring communities:

LRDP Mitigation AES-4A: Prior to approval of development projects on Storke Campus under the 2010 LRDP, the UC Santa Barbara Design Review Committee shall review project designs for protection of views to the Santa Ynez Mountains from viewpoints along Storke Road, El Colegio Road, Los Carneros, and roadways within Isla Vista that intersect El Colegio Road, and within and through the Storke Campus.

LRDP Mitigation AES-4B: Prior to approval of Storke Campus development projects visible from off-campus areas, the UC Santa Barbara Design Review Committee shall review project designs for:

- Campus development and design along Ocean Road respecting the adjacent Isla Vista and Storke Ranch Compatibility with adjacent neighborhoods in terms of scale, proportion, appearance, and solar access, as well as maximizing views to the Pacific Ocean.
- Project development and design on the Storke Campus shall consider the effect of existing and that proposed landscaping does not block views of the mountains or ocean.

These mitigation measures will reduce impacts related to views and the transition to Storke Ranch to a less than significant level.
Response to Comment I-1-3. The LRDP and EIR are programmatic documents and are not intended to include site-specific analysis of potential tree removals. Nevertheless, the biology section, and supporting surveys, documented existing conditions, including tree stands and nests. Mitigation Measures BIO-3A through 3C will minimize disturbance of active nests, as will LRDP Policies ESH-4 and 5. LRDP Policies SCEN-5 and 6 will also guide and limit tree removal. In addition, the following mitigation measure will be added to Impact BIO-3 (p. 4.3-41):

LRDP Mitigation BIO-3D: To mitigate impacts to wildlife habitat the University shall apply the following replacement ratios for mature trees (8 inches or greater diameter at breast height) which are removed by LRDP construction:

- 10:1 for mature native trees; and
- 5:1 for mature non-native trees.

Replacement trees shall be either sycamore, oak, or another native tree species. In the case when oak trees are removed, oak trees shall be used for replacements. Placement of replacement trees should be 20 feet minimum, and they shall be monitored, nurtured, and protected within the dripline to encourage survival of a minimum of 5 years.

Response to Comment I-1-4. The access road and buffer area are proposed to remain (see Figure D.13 of the LRDP). See also response to Comment I-1-2 regarding the compatibility of proposed development and existing buildings.

Response to Comment I-1-5. See responses to Comments I-1-2 and I-1-4.
Dear Sir or Madam:

Thank you for the opportunity to provide my comments on the UCSB 2008 Draft LRDP and EIR. My major comment is on the optional parking lot proposed for the West Campus Bluffs on Camino Majorca. I am a biologist, but not an ecologist. However, I do have the benefit of having a coastal ecologist, Dr. Jenifer Dugan as a neighbor and I have talked to her extensively about both this issue and the proposed beach access stairway at the historical Campbell Beach house. I urge the reviewing agencies to carefully consider Dr. Dugan’s scholarly and analytical letter. She is not only a highly respected ecologist but also a long-time resident of the West end of Isla Vista, the area that will be impacted the most by these projects.

As an citizen of coastal California, and specifically as a long-term resident of the western-most part of Isla Vista, the conversion and development of any of the few remaining undeveloped coastal bluff lands in the region into a parking lot impresses me as constituting an action that will be of extremely significant impact. I personally don’t see how the construction of such a lot, on rare coastal land can be justified or offset by other measures. What coastal bluff land remains throughout California is far too scarce, fragmented and precious to be used for parking or other unnecessary developments. Any development of this particular coastal land on the West Campus Bluffs will have severe adverse impacts on the ecology of the bluffs, beach and coastal zone, and the traffic, noise, and air pollution will endanger and degrade the quality of life for local residents, including my family. None of these impacts are considered or addressed in the DEIR or LRDP.

The proposed new parking will be on coastal wetlands and as far as I can tell, the wetland delineation conducted for the DEIR did not sufficiently include the West Campus Bluffs.

As a 35 year resident of the only remaining neighborhood of single family homes in Isla Vista, I have watched the quality of the surrounding area undergo continual degradation as the recreational use of the coastal access increases. While I am a proponent of rightful coastal access this must be provided in a way that will not degrade the quality of the environment nor any surrounding neighborhoods. It is clear that the any new parking lot on the West Campus Bluffs will negatively impact and significantly degrade the quality of life in this already greatly impacted area. It will mean increased, unsafe, uncontrolled, traffic; significantly increased noise and disturbance of the neighborhood; increased air pollution, trash and dirt in the adjacent area and our yards; loss of views across currently open space; and loss of the quiet family atmosphere of a neighborhood that has a significant population of both children and elderly residents.

Isla Vista is a very densely populated area with few sidewalks or paths. It’s streets are heavily used by an alarming mix of cars, pedestrians, skateboarders, and bicycles. Many of the street intersections are blind and uncontrolled including all of those that would provide access to the new proposed parking lot. Increased traffic generated by any new parking lot will greatly increase the already significant traffic hazards of the area. Currently the open West Campus Bluffs bordering Camino Majorca provides a much needed safety corridor from Faculty housing to the Camino Majorca beach access and from Camino Majorca, to more western beaches. The
proposed parking lot on the West Campus Bluffs would greatly increase hazards to all non-
vehicular users of the area and push more walkers, bicyclists and equestrians into the
overcrowded street. These significant impacts to traffic, traffic speeds, recreation, noise, quality
of life and pollution are not considered nor addressed in the DEIR or LRDP.

The remaining single-family residences of Western Isla Vista and the open spaces of the West
Campus Bluffs and West Campus beaches provide a much-needed tranquil refuge for humans
and wildlife from the overcrowded and poorly planned community of Isla Vista. It adds greatly
to the attractiveness of UCSB as major campus in the University of California system. UCSB
students actually make up the majority of Isla Vista’s population, and as the community becomes
more and more enclosed, there is less and less recreational/quiet/natural space for these students
to enjoy. Please preserve what is left of this environmental refuge by reducing traffic, providing
transportation alternatives, using existing parking lots and beach access points. Please do not
produce more negative impacts by creating a new parking lot on Camino Majorca.

Sincerely yours,

Steven K. Fisher, PhD.
Letter I-2
Steven K. Fisher, PhD.

June 23, 2008

Response to Comment I-2-1. According to LRDP Policy TRANS-4, “The campus shall allow for up to 80 coastal access permit parking spaces on the North and West Campuses, distributed among four locations; the north entrance to West Campus, the Camino Majorca entrance to West Campus Bluffs, the western terminus of Phelps Road, and at Coal Oil Point.” [Emphasis added]. The parking spaces proposed on Camino Majorca (an optional location for public access parking as indicated in the LRDP), would coincide with the pre-existing informal parking area on the side of the road, adjacent to the row of eucalyptus trees at the entrance to the West Campus Bluffs area (LRDP, p. E.9). Because this area is already used for parking, providing formal coastal access parking at this location would not create new environmental impacts. Moreover, any parking or access improvements would be subject to environmental review and to the following LRDP policy [emphasis added]:

TRANS-10 Public access policies under this section shall be subject to restriction, as determined by the campus, only when public access is inconsistent with the following:

- Public health or safety;
- Natural disaster, civil disorders which pose a threat to property, or other such seriously disruptive events;
- Extraordinary measures which are required to immediately avert, alleviate, or repair damage to campus property, or to maintain the orderly operation of the campus;
- Military security needs;
- Protection of fragile coastal resources; and
- Adequate nearby access.

Moreover, as noted beginning on page 4.12-19 of the EIR, Coastal Act policy requires that any new or improved coastal access point take into account the capacity of a site to sustain use and the fragility of natural resources. Such existing regulation will serve to ensure the protection of sensitive coastal resources.

Response to Comment I-2-2. The proposed parking on Camino Majorca would be located within the current parking area on the side of the road, an area that is not known to be within a wetland. (See response to Comment #1.) No formal wetland delineation has performed for the area, although Figure 4.3-1, showing an overview of habitat types, was prepared by experienced biologists and is generally accurate at a programmatic scale. Project-specific environmental review of coastal access development will consider and mitigate any impacts to wetlands.

Response to Comment I-2-3. As discussed in the response to comment I-2-1, the proposed parking area is located within an existing area available for parking. As also noted in the response to comment I-2-1, coastal access improvements may be restricted if they would be inconsistent with public health and safety. Specific projects under the LRDP will undergo additional, project-specific environmental review at the time they are proposed.

Response to Comment I-2-4. Please see response to Comment I-3.

Response to Comment I-2-5. As the commenter suggests, the planned coastal access development at Camino Majorca would use an existing parking area. The specific impacts of this development will be analyzed, and mitigation measures identified to minimize any significant impacts, at the time the development is proposed. Please see response to comment I-2-1 for more information.
June 23, 2008

University of California Santa Barbara
Office of Campus Planning & Design
c/o Vision 2025
Santa Barbara, CA 93106-1030

Re: Comment Letter to UCSB 2008 LRDP DEIR

Gentlemen:

This letter is intended to be a formal CEQA comment letter to the UCSB 2008 Long Range Development Plan/Draft Environmental Impact Report, LRDP DEIR. I am a local farmer and businessman who has been a customer of the Goleta Water District (GWD) for approximately 18 years. I am also an attorney who for over the past 4 years has been closely monitoring the activities of the GWD. I have been an advocate that the GWD has not been properly administering the SAFE Water Supplies Ordinance (SAFE), which was an ordinance adopted by the customers of the District in 1991 and amended in 1994. A copy of the SAFE Ordinances are attached hereto as Exhibit A and incorporated herein.

I am particularly concerned that since the arrival of the State Water in 1997 the GWD has not applied the provision of SAFE to the water supplied in the past to the University. The GWD, per its recent comment letter dated June 16, 2008 to the LRDP DEIR, states that the rights of the University for water from the District is subject to the current rules and regulations for new, additional, further expanded, or increased size water connections. It also states the University also has a contract with the District which defines its rights. However, there are no specific discussions or comments as to the consequences to the University of the application of the SAFE Ordinances to the development plans of the University or how the contract changes the provisions of SAFE. It is to be noted that the referred to contract was entered into after SAFE was adopted by the voters in June 1991! The GWD letter is vague and ambiguous and offers no guidance to the University as to the information in its 2008 DEIR or the water supply situation.

The undersigned has received and reviewed the comment letter from Russell R. Ruiz, dated May 21, 2008, to the 2008 DEIR. The points made by Mr. Ruiz are fundamentally correct; however, his comments do not consider the consequences of the
application of the SAFE Water Supplies Ordinances as to the timing and amounts of potable water which can legally be made available for the University's projected new development plans.

In order to avoid unnecessary redundancy in the following comments, I will not make specific references to Mr. Ruiz's May 21, 2008 comment letter as to the information and his comments, which I will adopt per this letter. However, where I believe his comments are not adequate as to the restrictions placed upon the GWD supplying additional water service to the University under SAFE, I will make my comments.

This letter will address the Water Supply Section of the 2008 UCSB LRDP, hereinafter referred to as the "LRDP DEIR." The facts involving the application of SAFE clearly establish that the GWD does not have adequate water supplies to support the LRDP as currently proposed. The unequivocal provisions of SAFE described below makes it impractical for the University, in competition with all of the other demands for new or additional water from the GWD under SAFE, to proceed in any feasible fashion to develop its campus as planned.

Section 4.14, page 1, regarding permit 14.

Mr. Ruiz's comments are basically correct, but not complete as will be pointed out below. The GWD in its recent comment letter to the LRDP has stated that permits 14 and 16 are no longer operative as to the supplying water to the University. See Page 1 of GWD's comment letter. Thus the reliance upon these permits is completely wrong.

The principal flaws in Section 4.14, Mr. Ruiz's analysis, and the GWD's comment letter, is that they all fail to have any discussions or analysis of how the provisions of SAFE restricts the annual amount of potable water available for all new connections in the water district and that every customer of the GWD has the right to obtain new water, on a first come basis, for a current district-wide total of 156 acre feet. The total amount of available water is to be adjusted annually to equal 1% of the District's total potable water supply. Once this 1% amount has been allocated among its customers, the GWD under SAFE cannot issue any additional new water for its customers for the balance of that calendar year. Thus, the University is not entitled to any specified amount of total water for its developments per any contractual relationship with the GWD, or any amount of water in any particular calendar year. The fact that the County and City of Goleta have approved, or are in the process of approving, a multitude of rezoning and new developments which will be in direct competition for the amount of potable water allowable each year per the restrictions of SAFE, has been completely ignored.
Future Water Demand, Section 4.14.1.3.

Mr. Ruiz's comments are correct, but again not complete as to the future water Demand Analysis under Section 4.14.1.3. The defect is reflected by the failure to set forth the consequences of the specific provisions of SAFE that require the GWD to supply, on an annual basis, an amount equal to 2/3 of the total amount allowed that year for new water, to be part of its Annual Storage Commitment to the required "drought buffer" per SAFE. See SAFE, II-Water Supply Distribution Plan, ¶ 5. Thus, even if the University was in line and obtained the fully allocation of the current 156 acre feet of water allowed for new customers, the effect on the future demand of the GWD would be to increase the total water demands on the District to approximately 260 acre feet per year (156 acre feet for development plus 104 acre feet as contribution of the 2/3 amount to the drought buffer). Thus the table 4.14-7 is completely wrong because of its failure to account for the 2/3 required annual additional contributions to the "Drought Buffer."

This additional water for the drought buffer is ignored by the LRDP. In addition, the Drought Buffer cannot, under any circumstance be used as a supplemental water supply for new or additional demands for water within the District. This relevant fact is excluded from all analysis of the amount of water available for new developments. The simple fact as that under the requirement of SAFE is that in a very few years of releasing water for new development per the 1% limitation of the potable water available and the 2/3 requirement as to the "Drought Buffer," even in normal years the available water supply of the GWD will be exhausted and the community will be placed in a situation of chronic drought. In that situation, the water in the Drought Buffer cannot be given to all of the new customers of the District which become its customers after 1991. This restriction would fully apply per all of the various projects per the LRDP.

The other major fatal flaw per the Water Supply Analysis of the LRDP is that it is based upon basic data from the GWD's 2005 UWMP and 2008 Water Supply Assessment for the County of Goleta. Both of these documents of the GWD failed to consider the application of the requirements of the SAFE Ordinance and thus reached factually incorrect conclusions as to the available water supply of the GWD and its ability to satisfy the demands of both its existing and new customers when there is massive new development as proposed by the University and the many developers who are currently seeking rezoning and permits for their substantial new developments.

The application of the provisions of SAFE are not something that can be ignored by the University in its LRDP DEIR. The GWD has been woefully deficient in the application and analysis of the provisions of SAFE and has not made adequate disclosures and analysis in its statutorily required 2005 Urban Water Management Plan and its 2008 Water Supply Assessment for the City of Goleta. Until these deficiencies at the GWD are cured, the Water Supply and Demand Analysis of the LRDP-DEIR will remain fatally flawed.
I will be able to supplement the above analysis of SAFE at the convenience of any concerned person. However, under the present misinformation being provided by the GWD, further analysis of the LRDP DEIR is an exercise in futility.

Very truly yours,

[Signature]

John A. Ruskey

JAR/bs
Enclosure

cc: Goleta Water District
City of Goleta

100469958_1.DOC
FULL TEXT OF MEASURE H91
GOLETA WATER DISTRICT
Ordinance No. 91-01
SAFE WATER SUPPLIES ORDINANCE

THE PEOPLE OF THE GOLETA WATER DISTRICT, COUNTY OF SANTA BARBARA, STATE OF CALIFORNIA, DO ORGANIZE AND ENACT THE FOLLOWING ORDINANCE WHICH SHALL BE KNOWN AS THE SAFE WATER SUPPLIES ORDINANCE:

RECEITALS:
Whereas, the Goleta Water District ("District") faces a significant shortage of water to meet current long-term water demands of its customers as determined by the State Department of Water Resources and the Santa Barbara County Flood Control and Water Conservation District in their 1985 Santa Barbara County Water Project Alternatives study; and

Whereas, the Santa Kunst groundwater basin was declared in Santa Barbara County in 1950 following four years of below normal precipitation within Santa Barbara County and, in the future, the District will continue to be subject to recurrent drought cycles which will threaten the ability of the District to meet the health and safety needs of its customers unless new and diversified, long-term water projects are developed; and

Whereas, the District relies exclusively on local water supplies to meet its current water demand, which supplies originate entirely within Santa Barbara County and which supplies are all subject to the same climatic conditions; and

Whereas, in the absence of a system limiting the District's authority to provide new and/or additional water service connections without first mandating ground- water storage of water in wet years for use in dry years (a "drought buffer program") District customers may face severe water shortage in the future; and

Whereas, on October 1, 1980, the Board of Directors of the Goleta Water District adopted a Water Supply Management Plan which includes use of water supplies from both a desalting plant and the State Water Project; and

Whereas, the District is a party to an agreement with the Santa Barbara County Flood Control and Water Conservation District entitled "Water Supply Retention Agreement" dated December 11, 1984 which it executed on June 28, 1986 (the "WSRA") entitling the District to 4500 acre feet per year from the State Water Project, and has executed amendments thereto; and

Whereas, the District is also a party to a "Contract for Preliminary Studies of Financial Feasibility, Preliminary Design and Environmental Review Under State Water Project Contract" (the "Design and EIR Agreement") dated June 2, 1986, but did not identify itself as a proposed participant in the preliminary studies in response to the "Notice of Intent to Request Preliminary Studies" for the Coastal Branch and the Mission Hills Extension of the California Aqueduct given by the City of Santa Barbara to the District on May 24, 1986; and

Whereas, the WSRA and its amendments and the Design and EIR Agreement contain the ways and means to provide for a long term solution to the existing drought cycles and to the ongoing water shortage within the County of Santa Barbara; and

Whereas, the District has a duty to provide a permanent, reliable water supply to its residents.

NOW, THEREFORE, THE FOLLOWING ORDINANCE IS ENACTED INTO LAW:

I. Drought Buffer
1. In each year, commencing in the first year the State Water Project makes deliveries to the District, the District shall, after providing service to its existing customers, commit at least 2,000 acre feet of its water supply (the "Annual Storage Contribution") to the Goleta Central Basin either by direct injection or by reduction in groundwater pumping. The water so stored in the Central Basin shall constitute the District's "Drought Buffer.

2. The Drought Buffer may be pumped and distributed by the District only to existing customers and only in the event that a drought on the South Coast causes a reduction in the District's annual deliveries from Lake Cachuma. The Drought Buffer cannot, under any circumstances, be used by the District as a supplemental water supply to serve new or additional demands for water within the District.

3. Unless and until the Central Basin Water level rises to 100% of its 1972 levels, the District shall be required to make its Annual Buffer Commitment. Thereafter, for so long as the District maintains the Central Basin at or above 1972 levels, the District may utilize the yield of the Central Basin to lower the cost of water service to existing customers.

II. Water Supply Distribution Plan
4. The District shall be forbidden from providing new or additional potable water service connections in any areas that previously served by the District until all of the following conditions are met:

a. the District is receiving 100% of its deliveries normally allocated from the Cachuma Project;

b. the District has met its legal obligations required by the judgment in Wright v. Goleta Water District;

c. water rationing by the District is eliminated;

d. the District has met its obligation to make its Annual Storage Commit- ment to the Drought buffer.

5. For each year in which the conditions of paragraph 4, have been met, the District shall be authorized to release 1% of its total potable water supply to new or additional service connections and if such new releases are authorized, the District shall permanently increase the size of its Annual Storage Commit- ment made to the Drought buffer by 2/3 of the amount of any release for new or additional uses so that safe water supplies in times of drought shall not be endangered by any new or additional demands.

III. State Water Supply
6. Due to controversy concerning the physical ability of the State Water Project to deliver its full contractual commitments, District shall plan for delivery of only 2,500 acre feet per year as is the agreement, a firm new deal shall be sought for the State Water Project. Any excess water actually delivered shall be stored in the Goleta Groundwater basin for use in drought.

7. The District shall not (a) give Notice of its Intention to Request Construction of Describes Projects Facilities under the State Water Contract, as provided for in Section 5(a)(1) of the WSRA or (b) respond to any such notice previously given by any other Contractor as provided for in Section 5(a) of the WSRA that is not otherwise required to do so by the District.

8. The Project Facilities to be constructed pursuant to the Notice of Intention shall be the Mission Hills and Santa Ynez Extensions of the Coastal Branch of the California Aqueduct and all of such bond issues, reserve funds and bond interest are used for the purposes of constructing the Project Facilities, including any and all necessary facilities required for the delivery of State Water Project water pursuant to the District through the Coastal Branch of the California Aqueduct, including any and all expenses incidental thereto or connected therewith, and shall include, without limitation, the cost of acquiring rights of way, the cost of constructing and/or acquiring all buildings, equipment and related items necessary to operate the project, and the engineering, environmental review, inspection, legal and fiscal agent's fees, costs incurred by the District or joint powers agency in connection with the issuance and sale of such bond issues, reserve funds and bond interest is estimated to accrue during the construction period and for a period of not to exceed twelve (12) months after completion of construction, such bonds to be payable from the District's water revenues, to bear interest at a rate or rates not to exceed the legal maximum rate, and to mature in not more than forty (40) years from the date of issuance.

9. This Ordinance shall be submitted to a vote of the people of the District in compliance with all local, state and federal environmental laws. Nothing in the Ordinance shall be construed to require such compliance prior to the election provided for herein.

10. This Ordinance shall be liberally construed and applied in order to fully promote its purposes. If any word, sentence, paragraph or section of this Ordinance is determined to be unenforceable by a court law, it is the intention of the District that the remainder of the Ordinance shall be enforced.

11. If adopted, this Ordinance shall be an amendment to the Safe Water Policy Ordinance adopted by the people in May, 1972, and may not be modified except pursuant to the vote of the electorate of the District. To the extent that the provisions of this ordinance conflict with that ordinance or any prior ordinance or measures previously enacted by the District or the voters of the District, the provisions of this ordinance shall control. To the extent that the provisions of this ordinance conflict with any other ordinance or measures adopted at the same election, the ordinance or measures receiving the highest number of affirmative votes shall control.

12. Nothing herein is intended to affect the rights of any parties nor the obligations of the District pursuant to the judgment in the action known as Wright v. Goleta Water District, Santa Barbara Superior Court Case No. SM04-0059.

13. This ordinance shall take effect immediately upon being approved by a majority vote of the votes cast at the election.
FULL TEXT OF MEASURE J94
GOLETA WATER DISTRICT

AN AMENDMENT TO THE SAFE WATER SUPPLIES ORDINANCE

THE PEOPLE OF THE GOLETA WATER DISTRICT, COUNTY OF SANTA BARBARA, STATE OF CALIFORNIA, DO ORDAIN AND ENACT THE FOLLOWING ORDINANCE WHICH SHALL BE AN AMENDMENT TO THE SAFE WATER SUPPLIES ORDINANCE:

RECITALS:
WHEREAS, the voters of the Goleta Water District ("District") enacted the SAFE Water Supplies Ordinance ("SAFE") in June 1991 authorizing the participation by the District in the State Water Project and providing for the bond financing to develop the Project Facilities necessary for delivery of that water to the District; and

WHEREAS, the District is now a member of the Central Coast Water Authority, the members of which are cooperating collectively to develop the Project Facilities which are now under construction; and

WHEREAS, SAFE provides for the creation of a Drought Buffer of water stored in the Goleta groundwater basin to protect against future drought emergencies and a Water Supply Distribution Plan to protect the District's water supplies against new demands until deliveries from the State Water Project are available; and

WHEREAS, this proposed amendment to SAFE maintains all the provisions regarding the protection of water supplies provided by the Drought Buffer and the Water Supply Distribution Plan; and

WHEREAS, pursuant to provisions of the judgment in the lawsuit known as Wright v. Goleta Water District, the District is required to develop a Water Plan to provide the necessary water supplies to achieve a balance between supply and demand for water within the District. The District's Water Plan is based on continuing to use the maximum amount of water available from the Cachuma Project; prudent management of the Goleta groundwater basin; use of the newly constructed wastewater reclamation project to replace existing use of potable water for turf irrigation; a continuing water conservation planning effort; participation in the State Water Project; and the necessary level of commitment to a desalinated seawater project. As a result of the long-term water supply deficit in the District, the District has been operating under a water connection moratorium for over twenty years. Once fully implemented the District's Water Plan should provide adequate supplies to meet long-term water demand in the District; and

WHEREAS, the forty year water service contract with the United States Bureau of Reclamation for delivery of water from the Cachuma Project will expire in May 1995. Negotiations are currently under way to renew that contract. The Bureau of Reclamation has required that the Cachuma Project be subjected to an environmental review process which is now being undertaken. It appears likely that the District's yield from the Cachuma Project after contract renewal will be less than the current yield as a result of the dedication of water for environmental enhancement purposes on the lower Santa Ynez River; and

WHEREAS, the Southern California Water Company is a Santa Barbara County water purveyor which currently holds rights to an entitlement to 3,000 acre feet per year of water from the State Water Project and has given notice of its intent to sell 2,500 acre feet of that entitlement. The Goleta Water District has identified itself as a potential purchaser of the entitlement. It is the intent of this Ordinance to authorize the acquisition and use of that entitlement; and

WHEREAS, the District estimates the annual cost of the Southern California Water Company entitlement to be $500 per acre foot of water delivered to the District. The entitlement acquisition is intended to reduce the long-term costs of water to the District and its customers in that alternative supplies that would be available, and necessary to meet the District's long-term demand would be more expensive than the water available from Southern California Water Company. The District's cost analysis of the acquisition is available at the District office.

NOW, THEREFORE, THE FOLLOWING ORDINANCE IS ENACTED INTO LAW:

1. The District is authorized to acquire an additional entitlement to the State Water Project in an amount of up to 2,500 acre feet per year, which is currently available from the Southern California Water Company. This entitlement will supplement the 4,500 acre feet per year authorized by the voters in originally adopting the SAFE Water Supplies Ordinance. This authorization shall provide for the payment of all costs of the acquisition and use of any additional entitlement acquired. Due to the controversy concerning the physical ability of the State Water Project to deliver its full contractual commitments, the District shall plan for the delivery of 3,800 acre feet per year of water as the amount of firm average long-term yield. The District's total State Water Project entitlement includes the basic entitlement of 4,500 acre feet per year, the District's share of the drought buffer held by the Central Coast Water Authority and the entitlement acquired pursuant to this authorization. Any excess water actually delivered over 3,800 acre feet per year

AB-2

(Goleta Water District 04-08)

EXHIBIT A-2
shall be stored in the Goleta groundwater Central basin until the basin is replenished to its 1972 level, for use during drought conditions.

2. Enactment of this Ordinance shall comply with all applicable law, including the California Environmental Quality Act.

3. If adopted, this Ordinance shall be an amendment to the SAFE Water Supplies Ordinance adopted by the electorate in June, 1991, which amended and superseded the Responsible Water Policy Ordinance, originally adopted by the electorate in 1973. Paragraph 1 of this Ordinance shall amend and fully supersede paragraph 6 of the SAFE Water Supplies Ordinance. All other provisions of the SAFE Ordinance shall remain in full force and effect. If adopted, this Ordinance may not be modified except pursuant to a vote of the electorate of the District.

4. This Ordinance shall be liberally construed and applied in order to fully promote its underlying purposes. If any word, sentence, paragraph or section of this Ordinance is determined to be unenforceable by a court of law, it is the intention of the District that the remainder of the Ordinance shall be enforced.
Response to Comment I-3-1. Regarding the SAFE ordinance generally, please see Master Response - Water Supply, section III. Regarding the 1991 Water Reclamation Agreement between the University and the Goleta Water District, please see Master Response - Water Supply, section V.D.

Response to Comment I-3-2. Please see Master Response - Water Supply, sections II and III.

Response to Comment I-3-3. Please see Master Response - Water Supply, section V.D.

Response to Comment I-3-4. Please see Master Response - Water Supply, sections III.C and V.D.

Response to Comment I-3-5. Section 4.14.1.3 of the RDEIR provides demand projections that take into account the most accurate available information regarding future growth in the District’s service area, including the Isla Vista Master Plan and Bishop Ranch developments.

Regarding the annual allocation for new connections, please see Master Response - Water Supply, section III.C.

Response to Comment I-3-6. The SAFE Ordinance only requires that the District makes its Annual Buffer Commitment until the Central Basin Water level rises to 100% of its 1972 levels (GWD Ordinance 91-01 § I.3). The District found that the basin reached 1972 levels in 2007 (2008 WSA, p. 11). The 2008 WSA projects that the Basin will continue to be at or above 1972 levels (see Master Response - Water Supply, section III.A). The RDEIR similarly projects that 1972 levels will continue to be met, based on the information in the 2008 WSA.

Response to Comment I-3-7. Please see Master Response - Water Supply, section III.
Robert Rainwater  
5817 Encina Rd. #203  
Goleta, CA 93117  

June 7, 2008  

University of California  
Office of Campus Planning & Design  
c/o Vision2025  
Santa Barbara, CA 93106-1030  

Re: Public comment on Long Range Development Plan  

I am a private citizen living in northeast Goleta. For many years I worked in the  
industrial park around the Hollister/Los Carneros intersection. I normally commuted by  
bike along the Maria Ignacio and Ohern bike paths to UCSB, through UCSB on the bike  
paths, then via Los Carneros to my workplace. My comments concern bicycling through  
UCSB.  

I hope it is no news to you that local citizens regard biking through UCSB as being very  
dangerous due to inattentive, unpredictable student biking habits, narrow bike paths, and  
large bike traffic quantities. We realize alternatives exist, but the primary east-west  
alternative, Hollister through old town Goleta, is also extremely dangerous to bikers.  

I propose the Development Plan be changed to add bike lanes in both directions along  
Mesa Road between Goleta beach and Los Carneros.  

• These bike lanes would allow complete campus bypass for citizens not travelling to  
campus, and partial campus bypass for university students and workers travelling to  
eastern, western, and northern campus locations.  

• Touring cyclists following the ‘coastal route’ would have a well-marked and safe  
alternative to the current confusing, unmarked, and hazardous path through campus.  

• A campus bike bypass would be a boon to local bike commuters by saving several  
minutes per day off their commute times, thus making bike commuting more efficient  
and attractive.  

• Recreational and exercise bikers following the common local ‘Goleta loop’ would be  
able to exercise at a steady speed rather than trying to negotiate campus bike paths at  
unsafe speeds, as is the case currently.  

• Shopping by bike is becoming increasingly common, as is the use of bike trailers for  
shopping. A campus bike bypass would allow bike path access to the shopping in  
Camino Real Marketplace without impacting campus bike traffic.
- A campus bike bypass might prove to be cheaper to implement in the long run when compared to medical costs for bike accidents occurring on campus. I doubt you are aware of the medical costs from bike path accidents on campus. I have no statistics, but I know they happen. My elbow was broken and I had surgery and a lengthy and costly rehab due to a student swerving into me in the middle of campus on the bike path. Earlier this year, my friend suffered a dislocated shoulder from a student swerving into his lane and knocking him from his bike; his shoulder will never completely recover. UCSB authorities should consider liability issues arising from their inadequate, unsafe, and unpoliced bike paths.

Thank you for your consideration,

[Signature]

Robert Rainwater

email: r.rainwater@cox.net
Response to Comment I-4-1. The DEIR considers impacts related to increased bicycle traffic (Impact TRAFFIC-7) from on-campus and off campus cyclists, and determines that with the construction of bicycle improvements identified in the LRDP, these impacts would be less than significant. The commenter's proposed Mesa Road bicycle lanes could potentially provide further reduction in these impacts and may be considered as circulation plans are refined in connection with future project-level environmental review.
May 21, 2008

University of California Santa Barbara
Office of Campus Planning & Design
c/o Vision 2025
Santa Barbara, CA 93106-1030

Re: Comment Letter to UCSB 2008 LRDP DEIR

This is intended to be a formal CEQA comment letter to the UCSB 2008 LRDP DEIR. I am a lifetime and 8th generation Santa Barbara resident. My father and I are both alumni of the University and lifetime Members of the Alumni Association. We completely support the education and research mission of the University and I hope my daughter Stella can attend a U.C. Campus. I am an expert in local water supply, CEQA and land use. The focus of this letter will be the Water Supply Section of the document. We support the Main Campus improvements and non-residential new development and we look forward to its implementation at the Regents' earliest opportunity. As I intend to thoroughly explain, our community does not have adequate water supplies to support the LRDP as currently proposed. My advocacy will be that student enrollment be permanently capped at 20,000 students and that the amount of residential new development be reduced so that new development water demand shall be within the resource constrains that exist. The Goleta community suffered through a 25-year chronic water shortage that resulted in a long term Moratorium on new service connections and hardship for the community's residents, especially during the drought of 1988-1991. That chronic water shortage was caused in significant part by demands placed on the system by the University, the Goleta Water District's largest customer. As an enlightened community we must learn from, and not repeat our mistakes of the past in this regard.

I will briefly identify water related issues found in Section 2 of the document but I will explain and expand on those issues in my comments to the Water Supply Section. Although I know the Regents are the decision makers, I will refer to the Project Proponent as the "University." I will refer to the 2008 UCSB LRDP as the "LRDP." I will refer to the Draft EIR as the "EIR." I will refer to the Goleta Water District as the "Water Dist." I will refer to the Water Dist. 2005 Urban Water Management Plan as the "UWMP." I will refer to acre foot of water per year as "afy." I will refer to water duty factor as "wdf." I will refer to the State Water Project as the "SWP."
Section 2  Summary of Environmental Impacts and Mitigation Measures

Pp. 34-35  W-3

W-3A  This is not a feasible mitigation measure. I will explain in my comments to the Water Supply Section.

W-3G  This is not a lawful CEQA mitigation measure. Even if it could be argued to be lawful in a different setting, it represents bad land use and water supply planning. I will explain in my comments to the Water Supply Section.

Residual Level of Significance

I will explain in my comments to the Water Supply Section why the impacts of the proposed 2008 LRDP development would produce Significant and Unavoidable Class 1 impacts to potable water supplies.

Water Supply, Section 4.14

Page references in this Section shall be to the pages of Section 4.14

P. 1  Permit 14. The authors received incorrect legal advice at the outset that has seriously compromised the entire potable water supply analysis. Here the document states that, "The water supply analysis for UC Santa Barbara is complicated... The primary agreement for the Main Campus is known as Permit 14." This is not correct. I will explain under the heading UCSB Water Supplies, which begins at p. 6.

P. 2  Introduction. At the end of the introduction, it should be added for clarity that the 2008 LRDP was not included in the 2005 UWMP analysis.

P. 2  Cachuma Project. It should be added here that the Cachuma Project is currently the subject of a water rights proceeding before the State Water Resources Control Board ("State Board"). That proceeding will determine how the reservoir shall be operated in the future to balance Cachuma water supply needs with downstream water rights and the habitat needs of the endangered steelhead trout and other animals and plants in the Santa Ynez River habitat. The final decision of the State Board has the potential to significantly affect Goleta water supply.
The Cachuma Project has always been subject to siltation which gradually reduces its capacity. The recent Zaca Fire will significantly exacerbate that siltation process. New bathymetric measurements will be done within the next year. It is speculative today to anticipate the magnitude of the impact but for purposes of long term planning, based on siltation and the State Board process, the future projected yield should be reduced from 9,322 afy.

The State Water Project. It must be added here that the Water Dist. is subject to the SAFE Water Supplies Ordinance, an Ordinance enacted by the voters that cannot be amended by the Board of Directors. In part, the SAFE Ordinance mandates that for long term planning purposes the Water Dist. must use not more than 3,800 afy as the yield of the SWP. For reference, please see Water Dist. Resolution No. 2007-19. In addition to this legal mandate, please see the information at Table 4.14-17 that suggests that even the 3,800 afy yield may be overly optimistic.

Table 4.14-1. I will use this Table to make some general and global comments to the EIR. For decision makers and the public these type of Tables can be important so they should be accurate and easy to understand. In my opinion this Table needs work as explained. The category Estimate of Actual Deliveries Expected is misleading and should be deleted. The Table suggests it addresses long term supplies from 2010-2030. I am unaware of any Water Dist. estimate that on average Cachuma will deliver 12,200 afy and the SWP only 2,200 afy. Apparently the figures come from what may have occurred one year. They do not represent anticipated future yields. As discussed above, for long term planning I believe Cachuma Project yield should be reduced. A reasonable conservative estimate of Cachuma yield in the year 2025 would be 9,000 afy.

As discussed above the Water Dist. may not use a yield figure for the SWP over 3,800 afy.

I believe the following is an important comment for purposes of understanding this Section by the decision makers and the public. The discussion of Recycled water should be made a separate sub-section of the Water Supply Section. The use of Recycled water is of course vitally important and the University has demonstrated that it is the most sophisticated and efficient user of Water Dist. Recycled water. There is no question that the Water Dist. has an adequate supply of Recycled water to meet all demands during the planning period. Although an important water use issue, it is therefore not a significant CEQA issue. Combining the discussion of Recycled water with potable water gives those who are not expert on the issues, the misleading impression that the Water Dist. has more total water supply for new development than in fact exists. By totaling potable water with Recycled water as is done in this Table and throughout
the document, it appears that the Water Dist.'s supplies are much more robust than is in fact the case. In the suggested separate section on Recycled water, the Water Dist. capacity of 1,500 afy can be addressed and the fact that there will not be demand in excess of that during the planning period. The rest of the document can then focus on the critical CEQA issue, the available supply of potable water. Based on my suggestions the Total (potable) figure at the bottom of the Table should read 15,150 (Cachuma Project 9,000; SWP 3,800; Groundwater 2,350).

There are typographical errors in the footnote numbers to this Table.

P. 4 As addressed above, the normal water year supply of potable water in 2025 should be 15,150 afy.

The discussion of critical dry year and multiple dry years is somehow flawed. I do not believe the public should be required to decipher all these problems. If the Water Dist. does not have adequate supplies of potable water for LRDP buildout in normal years, it is intuitive that it cannot have adequate supplies in the critical dry year or multiple dry years. To the extent the Water Dist. uses Drought Buffer stored water to make up shortages in those years, it is constrained by law to use that water only to serve existing demands and not future new development demands. My comments in this letter focus on normal year supplies. I agree that dry year analysis and planning is important but I will leave it to the authors, hopefully working cooperatively with Water Dist. professional staff, to get that right. In my opinion too much of the Water Supply Section is devoted to the dry years discussion and by grouping the dry years information with normal years, makes the document confusing and difficult to follow. The focus should be on normal years, with one concise, accurate and easy to understand sub-section on the dry years issues. Do not combine Tables addressing normal years with dry years information.

P.6 Table 4.14-5. As discussed above, for long term planning purposes, Cachuma should be 9,000 afy; SWP 3,800 afy; and Recycled water should be segregated out in a separate discussion. Including the use of banked groundwater gives a misleading impression on available potable water supplies particularly when totaled with recycled water.

UCSB Water Supplies

P.6 Permit 14

Main, Storke and West Campuses. I will use this opportunity to address one of the fundamental problems in the approach taken in the entire Water
Supply Section regarding the "Permits" discussion. This is one of the reasons it was a terrible mistake for the University to choose not to have substantive, serious and public participation in the preparation of this document with the Water Dist. If the University had done so, this and other misunderstandings could have been addressed up front instead of now after the EIR is published. The two Permits discussed, **14 and 16** (16 applied to the so-called Devereux property) were issued pursuant to the Water Dist.'s Ordinance 72-2, that was enacted in December 1972 and was the initial Water Dist. action to establish the water connection Moratorium, based on the chronic water shortage in Goleta, that lasted for the next 25 years. The Permits were in fact valid when issued. These two Permits terminated along with all the other Permits issued by the Water Dist. under **Ordinance 72-2**, in December 1996 when **Ordinance 72-2** was rescinded and the Moratorium ended with the arrival of deliveries from the SWP. What the Permits approach has done is confuse the CEQA analysis and significantly understate the potable water supply impact issue. The EIR presumes that the Permits give the University a quantified entitlement to potable water and the only CEQA demand analysis necessary is that which is over the Permit amount. Describing the proper baseline is critical to any CEQA resource analysis. For purposes of this EIR the proper Water Supply baseline is the water demand assessed in the Water Dist.'s 2005 UWMP. In the UWMP the Permits and the UEC Agreement total maximum allotments were not considered part of the baseline. Another issue that the authors may not be aware of but the University certainly is, is the fact that Permit 14 was for the most part incorporated into the 1991 Agreement between the Water Dist. and the University. That 1991 Agreement is still in force and valid but it will terminate by its terms in 2010. In long term water supply planning 2010, just two years hence, is but the blink of an eye. The University has no reason today to expect the Water Dist. to negotiate a new agreement with the same terms. Of course the University could engage the Water Dist. today to initiate those negotiations and determine these issues. Today and in the future there will be a dynamic competition for the remaining potable water supplies of the Water Dist. The community is just coming to understand that we already see again on the planning horizon, the finite nature of the Water Dist.'s potable supplies. The cost of water for new development will be a significant issue for both the Water Dist. and the University. Under the terms of the 1991 Agreement the University would pay far below what every other property owner in the Water Dist. must pay for water for new development today and in the future. The Water Dist. will never negotiate similar financial terms in a new agreement. In 2005 the University filed a lawsuit against the Water Dist. over charges for potable water. For these reasons and others, the EIR must abandon this approach of using the Permits as a CEQA baseline. I will address below, the similar problem with the UEC Agreement discussion. Instead, the appropriate CEQA analysis requires an accurate determination of all LRDP new development water demand that was not assessed in the 2005 UWMP, and an analysis of the impacts of that new demand. Whatever the future legal disposition is on the Permits issue between the
University and the Water Dist., and that is entirely speculative today in part because the University has not yet engaged the Water Dist. in that negotiation, it cannot be argued but that for purposes of CEQA, the baseline for potable water analysis was established by the Water Dist.’s 2005 UWMP. **Appendix A @ pp.11-17 of the UWMP** thoroughly addresses the University related new development demands that were assessed at that time.

**P. 7**  
**North Campus and Parts of West Campus.** I will specifically address the problems with the UEC Agreement analysis under the heading found at p.15. It suffers from a similar problem as the Permits discussion.

**Devereux Property.** Again I will specifically address this issue under the heading found at pp. 15-16.

**P. 7**  
**Current Potable Water Use.** It appears that using an average of potable water use from a number of years where the use has been increasing is not accurate, especially when we know there has been new development on Campus during that time period. The latest figure of 606 afy should be used.

Using 606 afy and assuming the other figures in this discussion are correct (and it is difficult to follow) the total demand figure should be 862 afy not 814.

**Pp. 7-8**  
As discussed the document will be more easily understood and the critical CEQA issue highlighted by segregating the discussion of Recycled water in a separate sub-section.

**Pp. 10-12**  
The entire discussion at the bottom two paragraphs of p.10 and the text at p.11 and Tables 7, 8 and 9, is wrong and misleading in stating that the figures represent potable water demands. In fact they include recycled water supply and demand together with potable. If the expert authors cannot get this right, how do you expect the non-expert Regents and the public to understand this. As suggested you need to segregate the discussion of recycled water, and in another sub-section, the discussion of dry years issues. Look at the Water Dist. UWMP Table A-17 at p. A-18. The 16,736 Grand Total figure clearly includes 1,182 afy of Recycled water. In fact the total projected potable demand in 2025 using the most accurate projection, that based on local jurisdiction data is 15,554 afy. That is more than the available potable supply, even before the new demands represented by the 2008 LRDP. Look at UWMP Table 13, p.17. The 17,672 figure includes 1,500 afy of recycled water and a 4,500 SWP figure, instead of the legally mandated 3,800. There is no reduction to Cachuma. Even without a reduction to Cachuma, potable demand in 2025 exceeds potable supply without the new 2008 LRDP potable demands.
Water Demand Duty Factors for Future Development

The application of a low 0.152 afy per unit residential water duty factor ("wdf") to the proposed new Housing development is not reasonable. The Water Dist. UWMP was prepared by a highly qualified, very highly respected Santa Barbara based independent consultant with years of local experience in the areas of land use planning and water supply. That consultant, URS, has worked on University related land use projects in the past, including CEQA documents. The .21 afy per unit wdf for University related residential new development used in the UWMP was derived from local data and is very reliable. The effort to use a significantly lower wdf appears to demonstrate an intentional effort to minimize the true potential future water demands and impacts of the LRDP new development proposed. In many resource areas CEQA suggests the use of worst case scenarios. Good long term planning requires, if not worst case, at least reasonable averages. The application of a very low wdf derived from an apartment complex, to proposed faculty housing, especially the faculty housing proposed for the Devereux Property and other faculty housing proposed to be detached homes or independent condominium style housing, has no credibility, and would not be agreed to by the Water Dist. as a reasonable estimate of this new development's future water demands. Unless the University may provide evidence of the Water Dist.'s agreement to use a wdf for housing less than the .21 used in the UWMP, that is the wdf that should be used. For the faculty housing that is proposed to be detached single family homes the wdf should be a range between .29-.33 afy per unit. The Goleta community suffered through a chronic water shortage that lasted 25 years because of poor land use and water supply planning. Let's not repeat the mistakes of the past by underestimating the true impacts of this proposed new Housing development.

Main, Storke and West Campuses

Please see Comment above re: p.6 Permit 14.

Table 4.14-10

As discussed above the water duty factor for housing must be .21 afy per unit unless the University may show evidence of agreement by the Water Dist. to use a different and lower wdf. The potable water demand for Housing is 584 afy not 422. The Sub-total is therefore 917 afy not 755. As discussed above re: p.7 Current Potable Water Use should be 565 afy not 517.
As discussed, the critical CEQA issue that has been missed in using the Permits approach is the use of the proper baseline to assess all the new potable water demand of the LRDP not assessed in the 2005 UWMP. The last line item, Additional Potable Water Required for 2008 LRDP should be 917 afy, not 498.

Main Campus New Potable Water Demand

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<tr>
<td>New Housing</td>
<td>584</td>
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<td>New Instruction, Research and Other</td>
<td>333</td>
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New Additional Potable Demands for 2008 LRDP 917

The primary problem in using the University Exchange Agreement ("UCE") allotment for analysis is the same as the problem with the Permits analysis, it presumes the incorrect CEQA baseline. The UEC Agreement allotment was not considered part of the baseline for the Water Dist. 2005 UWMP. In order to do an appropriate CEQA analysis today, all the proposed LRDP new potable water demand not assessed in the UWMP must be considered. The UEC Agreement allotment does in fact give the University a "pass" on paying connection fees to the Water Dist. that would otherwise be due for new development water demands. That new demand must nevertheless be considered for CEQA purposes in determining all the new demands proposed in the 2008 LRDP.

Housing: The same issue with the wdf. Here some of this housing is intended to be faculty housing and is likely to look like and use water like typical Goleta detached homes. Therefore the appropriate wdf should be a range between .21 afy per unit and .33. The typical Goleta detached home uses between .29 and .33 afy per unit. The new demand for Housing here should be a range between 48.5-76 afy (231 x .21 = 48.5; 231 x .33 = 76). The Sub-total line and the Total new potable demand should properly be 49-76.5 afy.

Devereux Property Table 4.14-12

Same problem as with the Permits discussion in using the incorrect CEQA baseline. The Devereux Property was not considered at all in the 2005 Water Dist, UWMP. Although it is not a CEQA issue, the assertion that Permit 16 represents a right to receive 66 afy of potable water may set up a significant financial dispute between the University and the Water Dist. Pursuant to standard, generally applicable Water Dist. law and policy, each new residential unit would be subject to a new connection fee of
$7,610.00. 125 housing units x $7,610 = $951,250. The connection fee is the equivalent of $26,240 per acre foot of new demand. Instruction, Research and Other with a 18 afy new demand x $26,240 = $472,320. The total fees at issue would be $951,250 + $472,320 = **$1,423,570.00.** That would buy a lot of water and I do not expect the Water Dist. to roll over on that claim, and for the sake of Water Dist. ratepayers, I hope it does not.

The Housing wdf is similar to Table 11. This is housing intended for faculty on prime ocean front real estate, some of the finest property in the State of California proposed for new residential development. The residential development on the West end of the Ellwood Mesa currently under construction, just across the Ellwood Mesa from the Devereux Property, is selling for $2-$3 million per home and the lots are small with minimal landscaping. Particularly here the housing is likely to look like and use water like a typical Goleta home. The wdf should again be a range between .29-.33 afy per unit. The total water demand for Housing should therefor be a range between 36.25-41.25 afy. The total new demand represented by the 2008 LRDP here is therefor a range of between **54.25-59.25** (add the 18 afy for Instruction, Research and Other).

Pp. 16-17  **Table 4.14-13**

The same issue for Housing wdf. It has to be .21 per unit. The Housing Demand is therefor 35.25. The Total New Demand for this segment of the proposed new development is **37.25** not 28.

**Total New Potable Water Demand For 2008 LRDP**

| Table 10 | 917 |
| Table 11 | 49-76.5 |
| Table 12 | 54.25-59.25 |
| Table 13 | 37.25 |

Total **1,057.5-1,090 afy**

P. 17  **Regulatory Context**

Goleta Water District. It should be added that the Water Dist. is a **CEQA Responsible Agency** for this Project. As such the University should have had significant, serious and substantive interaction with the Water Dist. in the preparation of this document. It did not. The Water Dist. should have been given an opportunity to review and have substantive input on the Administrative Draft of the EIR. It did not.
The Water Dist. did not see the EIR until it was released to the public and had no idea what it would state on water supply.

P. 18  **SB 610 and SB 221**

Reference is made to the last paragraph. Although it is true that the Legislature apparently inadvertently did not include the Regents in the government entities required to comply with these statutes, because it was good practice and helped inform the public, the Regents did comply with the Water Supply Assessment statutes in preparing the San Diego Campus LRDP. In an email exchange dated September 21, 2007 I encouraged the University staff to do the same for the Goleta/Santa Barbara community. I cautioned that the University would likely regret a decision not to do so. The claim in this paragraph that Appendix 4.14-1 is the functional equivalent of a Water Supply Assessment has no credibility. The Water Dist. would not have prepared the same document or anything similar. All of these problems I am identifying in this document would have been addressed correctly. The public as a matter of law would have had an opportunity at Water District Board meetings to review and participate in the preparation of the document. None of that happened. The most telling information in Appendix 4.14-1 in my opinion is found under the heading References, Personal Communications——*None!*  

P. 19  **Standards of Significance**

1. This proposed Standard reflects a fundamental flaw in the entire Water Supply Section. The correct Standard is:

   If the 2008 LRDP potable water demand that was not assessed in the Water Dist.’s UWMP, together with the potable water demand that was assessed in the UWMP, exceeds the available potable water supply of the Water Dist. in the planning period, it is a Class I Significant and Unavoidable Impact.

P. 22  **Cumulative Impacts**

**LRDP Mitigation W-3A:** As discussed below this is not a feasible mitigation measure.
P. 23  **LRDP Mitigation W-3G:** As discussed below this is not a lawful CEQA mitigation measure. Even if it could be argued that in a different setting it could be lawful, it represents bad long term land use and water supply planning. The 2008 LRDP Project must be planned now to conform to existing resource constraints including potable water supply.

P. 24  **Residual Significance.** Class I Significant and Unavoidable Impact to potable Water Supply.

P. 26  **Table 4.14-15**

As discussed above, the authors somehow got the Critical Dry Year and Multiple Dry Years analysis wrong. It is intuitive that if there is not enough potable water in Normal Years, there cannot be enough in dry years. I also believe this approach is a disservice to the decision makers and the public. I am an expert in these issues and I am finding it very difficult to follow this discussion. One of the problems addressed earlier is including Recycled water in the Total Supply figure. That Total Supply figure is then compared to a potable water demand figure. The Overall Surplus conclusion is clearly erroneous. Again I do not believe it is for me as a member of the public to decipher all this. Just a few glaring problems. For SWP water 4,500 is used instead of the legally mandated 3,800. Somehow in Year 3 of the Multiple Dry Years 4,813 of SWP water is produced. That is not possible with the Water Dist.'s capacity in the SWP facilities. As discussed above, the demand figures are all wrong. At the end of this letter I will propose a simple, straightforward approach to supply and demand that will be understandable for the non-expert decision makers and the public. As stated above the focus needs to be normal year analysis. The inclusion of dry year analysis is just confusing. It needs its own concise, separate sub-section.

The important information for the decision makers and the public is, a conservative estimate of potable water projected to be available in 2025 in normal years, and the projected demand if the 2008 LRDP is approved as proposed.

| Available Potable Supply | 15,150 |
| Projected Demand W/O 2008 LRDP | 15,554 |
| Projected Demand of 2008 LRDP | 1,057.5-1090 |
| Projected Total Demand | 16,611.5-16,644 |
| **Potable Water Deficit** | <1,461.5> - <1,494> |
Pp. 26-30  **The State Water Project**

I will specifically address much of the discussion found in the document at these pages regarding the SWP but I will preface it with some general criteria taken from a recent California Supreme Court case on the subject.

Speculative sources and unrealistic allocations (paper water) are insufficient bases for decision making under CEQA.

An EIR must include a reasoned analysis of the circumstances affecting the likelihood of the water's availability.

The law's informational demands may not be met simply by providing that future development will not proceed if the anticipated water supply fails to materialize.

An EIR that leaves long-term water supply consideration to later stages of a project does not serve the purpose of sounding an environmental alarm bell before the project has taken on overwhelming bureaucratic and financial momentum.  **Vineyard Area Citizens For Responsible Growth v. City of Rancho Cordova** 40 Cal 4th 412.

The discussion of SWP water in these pages demonstrates a woeful lack of understanding of the SWP today and in the future. Actually some of the bad news is included but apparently disregarded in coming to the rosy conclusions that the University can acquire its own SWP water allotment and everything will be fine. For those of us in this community who understand these issues, that claim has no credibility and demonstrates a failure to understand some fundamental issues regarding the use of SWP water on the Santa Barbara County South Coast. Of course one of the problems of analysis is the gross underestimate of the amount of water needed. If it was only a couple of hundred acre feet per year that would be one thing. In fact it is almost 1,100 acre feet per year.

As discussed in the document particularly at pp. 28-29 and in Table 4.14-17 the problems being experienced by existing SWP contractors are addressed. No one believes these problems are going to get better. Existing SWP contractors across the State are extremely concerned about the ability of the SWP to produce the contracted amount of water needed. On April 16, 2008 Federal Judge Wanger, the same Judge who issued the ruling discussed at pp.28-29 of the EIR, issued a new ruling further curtailing Delta pumping because of the impacts to spring-run Chinook salmon and Steelhead.
trout. The University's claim that it will readily be able to find surplus water in the system is not supported by substantial evidence in the record, nor does such evidence exist.

**From the L.A. Times, May 2, 2008:**

California communities face a strong possibility of water shortages and even mandatory rationing this summer because of record dry weather in March and April, a fast-shrinking snowpack and below-normal reservoir levels, State officials said. The bleak news, contained in California’s final Sierra snowpack report of the snow season, means a second consecutive year of water anxieties in a State heavily dependent on water from the melting snow in the Sierra Nevada. "I have not seen a more serious water situation in my career, and I've been doing this for 30 years," said Tim Quinn, Executive Director of ACWA. An outmoded delivery system and Court rulings that protect endangered fish are also straining the system, he said. "This is a harbinger of relatively tough times, not just this year but for a set of years," Quinn said. He and others urged Californians to rein in water use.

The University and its Regents should set an example of good water management, and not be the extravagant consumers proposed by the 2008 LRDP.

Nowhere in this document does the University address the cost of this proposal. There is a direct nexus between cost and feasibility. We know that the University has been in discussions with the Carpinteria Valley Water District about acquiring some of its allotment but those discussions are not addressed in the EIR. I have no idea about the nature of those discussions but one must assume that Carpinteria's goal will be to recover all the investment it has made in any allocation sold. The Goleta Water District is committed to pay over $100,000,000.00 (One Hundred Million Dollars) for 4,500 afy capacity in the SWP system. Carpinteria's costs are proportionally the same. Will the Regents really make a financial commitment of that magnitude to this Project, just for water? The cost information for this proposal must be made available to the Regents up-front so that they may consider rejecting it now, before this train leaves the station.

The most fundamental problem with this proposal is the complete lack of understanding it demonstrates on how SWP water is used on the Santa Barbara County South Coast. It is a supplemental supply of water. Very valuable yes, but it cannot be the primary source of water to support new development. As discussed in this EIR it is anticipated by DWR that there will be years when only 4% of contract allotment is delivered. Deliveries regularly fluctuate between 10% and 70%. We may never have
another 100% delivery year. This year, a rather robust rain year locally and an average year throughout the State (although a low snowfall year), and deliveries are only going to be 35%. Lake Oroville is at less than 50% of capacity. Where does the water come from to support all the proposed new LRDP development in the low delivery years? The University has no answer. As a matter of law, policy and practicality the Water Dist. cannot supply the required water in those low delivery years. In the same years that the University would be experiencing SWP shortages, so would the Water Dist. This proposal is not feasible and the University needs to come to that understanding quickly.

P. 27  (1) **The Santa Barbara County Flood Control District Allotment.** There is no pipeline capacity for this allotment. There is absolutely no evidence to suggest that such pipeline capacity will ever be built, particularly not within the planning period of the LRDP. The costs would be astronomical. It is not going to happen. Considering all the problems the SWP is experiencing, and with issues like the Monterey Agreement litigation pending, the most likely scenario is that unexecuted contract allotment of this kind will be terminated.

(2) **Unused CCWA allotment.** The only CCWA Member that is openly marketing its allotment is the Carpinteria Valley Water District. For the right price others could be interested but as discussed above, are the Regents really going to make that kind of financial investment just for water for this Project? There is no evidence in the record on that issue so this proposal is entirely speculative. Of course the real problem of feasibility, discussed above, is the lack of a back up supply of water in the SWP low delivery years that the record demonstrates, are regularly going to occur in the future. On the Santa Barbara County South Coast, SWP contract allotment alone cannot support new development. It must be used conjunctively with other available reliable supplies which are not, and will not be available to the University within the LRDP planning period.

P. 28  Discussion of "second barrel" pipeline facility. The critical CEQA issue for the LRDP is the availability of potable water, not pipeline capacity on this side of the Santa Ynez mountains. Although the second barrel will likely someday be built, the claim that it is expected to be completed by 2010 is speculative. Today the funding has not been approved and is not currently available. This is a non-CEQA issue for this Project.

P. 29  "It is reasonably likely that the University will be able to obtain sufficient surplus water from the SWP to serve the development anticipated under the 2008 LRDP during normal years."
It is difficult to understand how this statement can be made immediately following the three paragraphs that precede it and Table 4.14-17. Just making the statement without substantial evidence in the record to support it has no credibility and does not approach the requirements under CEQA for a legitimate mitigation measure or findings on the availability of an adequate water supply.

P. 30  **Recycled Water.** The discussion here is odd in that it acknowledges that the demand reduction discussed "is unlikely." As shown above the demand figures are all wrong.

P. 30  **Reduce Enrollment.** Although I agree that the proposed enrollment must be reduced to conform to resource constraints including water supply, because the demand figures are understated and otherwise wrong, the per student water use projection is wrong. This is not a reasonable criteria to use to address the need to adopt an Alternative that will use less potable water. University planners have the ability to consider and address building specific water demands and determine what can be built within the potable water supply constraints that exist.

P. 31  As discussed, **Mitigation W-3G** is not a lawful CEQA mitigation measure. Even if it could be argued to be lawful in a different setting, when applied to water supply it just represents bad planning. In the area of water supply, actions and projects do not occur quickly. For long term water supply planning, the LRDP planning window does not allow time to formulate a new and currently undetermined feasible supplemental water supply for the Goleta Water Dist. service area. It took 25 years to implement the last supplement to the Water Dist.'s potable supply. The Water Dist. is and for many years will be grappling with the fiscal ramifications of that SWP investment. The Water Dist. currently has no fiscal reserves nor political will to make additional investment in new supplies. As our Supreme Court just recently stated:

"The law's informational demands may not be met simply by providing that future development will not proceed if the anticipated water supply fails to materialize."

P. 32  "The renegotiation of Permit 14, as discussed above, would provide the University with many additional years of water allotment, within GWD's supply."

As explained above, it is not Permit 14 but the 1991 Agreement between the Water Dist. and the University that terminates in 2010 that needs to be considered. It should be recognized that the Water Dist. has no obligation to enter into a new agreement with the University. Since 1990 it has been Water Dist. policy to avoid new contracts with customers and instead treat all District customers equally and pursuant
to generally applicable District policies. It may choose to do that with the University after the termination of the 1991 Agreement. The 1991 Agreement was largely motivated by the Recycled Water Project in which the University was an important partner in the implementation and use of recycled water. If the Water Dist. does choose to negotiate a new agreement, that agreement will have to conform to its UWMP. It is likely that there will be a convergence between the termination of the 1991 Agreement in 2010 and the UWMP statutes' requirement that the Water Dist. prepare a new UWMP in the year 2010. That will be a year long process and will probably initiate in late 2009. Any new agreement with the University will have to conform to the supply and demand constraints that exist in the District service area, the UWMP statutes, and CEQA requirements regarding findings on adequate water supply to meet the agreement's terms.

P. 32  “Because, with mitigation, sufficient water supplies can be identified with reasonable certainty for the University’s 2008 LRDP... the impacts of the project are considered less than significant.”

As explained, in fact as proposed the LRDP would have Significant and Unavoidable Class 1 Impacts to potable water supply that cannot be feasibly mitigated within the planning period.

P. 33  References, Personal Communications: Gary McFarland, Goleta Water District, March 2008

It is my information that Mr. McFarland has no specific recollection of this communication. He is not suggesting it did not occur but it was not significant. Apparently it addressed only the issue of available pipeline capacity to convey potable water should the University be able to find it. The Water District had no substantive role in the preparation of the EIR and was not given an opportunity to review and comment on an Administrative Draft before the EIR was published.

Alternatives

The Alternative I propose could be entitled, "Living Within the Santa Barbara County/Goleta Resource Constraints Alternative." The Alternative as proposed would fulfill most of the Project’s objectives and eliminate the Project’s otherwise Significant and Unavoidable Class 1 Impact to potable water supplies. This Alternative would have the following elements:

1. Permanently cap student enrollment at 20,000. Make this a CEQA mitigation measure so it may be enforced.
2. Approve the Main Campus Form development with the proportional reduction provided by the reduced number of students.

3. Pursue much of the student housing on property in Isla Vista recently approved for new residential development under the Isla Vista Master Plan.

4. Build as much of the faculty housing as existing potable water supplies will support. Land bank the remaining property for future use after Goleta water supplies are supplemented. This will not occur until after the current planning period for the 2008 LRDP ends in 2025.

Although I recognize the Project's objectives are important to the University, the Regents must accept that the Santa Barbara Campus does not exist in a world of its own. The Goleta community made a huge financial investment in the State Water Project to end a 25 year chronic water shortage. The community is just now coming to terms with how that water will be used in the future. The University is of course an important component of that planning process. The City of Goleta is working on its General Plan. The County is beginning the process to update the Goleta Community Plan. The Isla Vista Master Plan was just approved. There are significant issues pending regarding the future yield of the Cachuma Project and the State Water Project that will not be resolved quickly and certainly will not result in more water being available. These land use planning and critical water supply issues must be understood and resolved before all the available potable water in Goleta is claimed for new development. There must also be a community dialogue on how to avoid once again, over-subscribing the Water Dist.'s limited supplies. It is not good planning policy to approve development plans to use every last drop of water available. That policy has already been violated with this proposed LRDP Project that presumes to not only use every last drop of potable water available, but a whole lot more, that has not been reliably or feasibly identified. I do not presume to have the answers to all these issues today, but probably led by the Water Dist., the amount of water to be made available for use in future new development needs to be addressed and decided. How that water is allocated among competing property owners and uses must be considered and decided in a community wide dialogue. The Coastal Commission, the City of Goleta and the County together with the University must be engaged in these discussions with the Water Dist. If that does not occur it is almost inevitable that these critical community planning issues will instead be decided by a Judge. That would be the ultimate in bad planning.
The proposal to pursue student housing in Isla Vista as an Alternative to what is proposed, is reasonable and feasible in that many of the Project’s objectives may still be achieved and the Water Dist.’s UWMP has planned to accommodate the new residential development in Isla Vista recently approved under the Isla Vista Master Plan.

Once the University’s planners and decision makers come to terms with the fact that they must design the 2008 LRDP within the potable water supply constraints that exist, they may prioritize the development proposed. Clearly some of the Housing will have to be delayed until after 2025 and after the Water Dist. has further supplemented its supplies. There will be a reduction in the amount of non-residential potable water demand from the necessary reduction in proposed student enrollment. University planners will then have to prioritize resources between student Housing in Isla Vista, other student Housing that has been proposed, and faculty Housing, and determine what can be built within the potable water supply constraints that exist.

If the Water Supply Section is to be re-written as it must be, to be CEQA lawful, I suggest the following:

1. Segregate the discussion of recycled water in a sub-section, as addressed above, and then focus the rest of the Section on potable supply and demand, the critical CEQA issue for this Project.

2. Segregate the discussion of dry years issues in a separate sub-section. Consult with the Water District professional staff to make sure you have it correct and accurate. Make the sub-section concise, simple and straightforward. Do not combine dry years discussion with normal years discussion and do not combine the information in the same Tables. The dry years issues are important but combining them with the normal years discussion makes the entire analysis confusing and difficult to follow. You need to get the normal year analysis correct and you need to be clear and easy to understand for the decision makers and the public. That is not currently the case.

3. Abandon the Permits and UEC Agreement approach. Accept the appropriate CEQA baseline as the water demand assessed in the Water Dist. 2005 UWMP. The new demand at issue in this EIR is all LRDP new development water demand not considered in the UWMP.

4. Use a .21 per unit water duty factor for all residential new development except the Devereux property residential development and all other detached faculty housing, which has a range of between .29-.33. It does the University no good to use a wdf that the Water Dist. has not agreed to. It just sets up a dispute the University
cannot win and misstates the appropriate and most reliable potable water demand figures.

5. Use the **Projected Water Use Based On Local Jurisdiction Data** as the most accurate projection from the UWMP. The potable demand figure for 2025 is **15,554** afy. 16,736 minus 1,182 recycled = **15,554** afy.

6. Use 15,150 afy as a conservative Total potable water supply figure available to the Water Dist. in the year 2025 in normal years. Cachuma 9,000 + SWP 3,800 + Groundwater 2,350.

7. Abandon the proposal for the University to attempt to secure its own SWP allotment as infeasible.

8. Accept that during the planning period the Water Dist is not going to further supplement its potable water supply. There is no evidence in the record or available to suggest otherwise.

9. Adopt an Alternative that will conform to existing potable water supply constraints.

   I will be happy to discuss any of this. I may be contacted at the email address stated above.

Sincerely,

Russell R. Ruiz

cc: California Coastal Commission attn.: Jennifer Feinberg
City of Goleta: Dan Singer, Anne Wells
County of Santa Barbara
Goleta Water District
Response to Comment I-5-1. Regarding Permit 14, please see Master Response - Water Supply, section V.D.

Response to Comment I-5-2. The purpose of the RDEIR is to analyze the environmental impacts of the implementation of the 2010 LRDP. The RDEIR relies on projected future water demand for the Goleta Water District service area as provided in the 2008 WSA in order to analyze the additional water demand that would result from development under the proposed 2010 LRDP. RDEIR, p. 4.14-20; see also Master Response - Water Supply, section I.

Response to Comment I-5-3. Please see the Master Response - Water Supply, section IV.A.

Response to Comment I-5-4. The RDEIR discusses the role of the SAFE Ordinance in the management of District water supplies on pages 4.14-13 to 17. Please see Master Response - Water Supply, section III for discussion of the applicability of SAFE.

Response to Comment I-5-5. The RDEIR provides a more recent summary of the District’s assumptions for available water supplies in normal rainfall years taken from the 2008 WSA. RDEIR Table 4.14-1 (p. 4.14-7) clarifies that the numbers contained in the table are the available water supply for future years. The projected yield for the Cachuma Project for future years is 9,322 AFY, consistent with the 2008 WSA. For further discussion of the projected water supply by source, please see the Master Response - Water Supply, sections III and IV.

Response to Comment I-5-6. The RDEIR uses a value of 4,500 AFY for the long term yield of the SWP. The District used this figure in both the 2005 UWMP and 2008 WSA. For additional discussion of SWP deliveries and reliability, please see the Master Response - Water Supply, section III.B.

Response to Comment I-5-7. The RDEIR discusses recycled water on pages 4.14-4 to -5, -7, -8, -10, -23 to -24, and -39 to -45. In addition, the RDEIR includes revised tables (Tables 4.14-11, -12, and -13) that clearly identify recycled water supplies separately from potable water supplies. Tables 4.14-11, 4.14-12, and 4.14-13 treat the contribution of recycled water as an offset to potable water use, consistent with the 2008 WSA.

Regarding the projected future recycled water supply and demand, see the Master Response - Water Supply, section V.A.

Response to Comment I-5-8. The typographical errors noted by the commenter have been corrected in the recirculated EIR Water Supply Section. The new Table 4.14-1 is as follows:
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<th>Sources</th>
<th>Available Water Supplies in Future Years (Actual Deliveries Depend On Demand)</th>
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</thead>
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<td></td>
<td>2010</td>
</tr>
<tr>
<td>Cachuma Project</td>
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</tr>
<tr>
<td>State Water Project</td>
<td>4,500</td>
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<tr>
<td>Groundwater</td>
<td>2,350</td>
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<tr>
<td>GW/Conjunctive Use</td>
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<tr>
<td><strong>Total:</strong></td>
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</tr>
<tr>
<td>Recycled</td>
<td>1,000</td>
</tr>
<tr>
<td><strong>Total Plus Recycled:</strong></td>
<td><strong>17,572</strong></td>
</tr>
</tbody>
</table>


**Response to Comment I-5-9.** The RDEIR reports the normal year potable water supply and the recycled water supply separately. Regarding the calculation of these quantities, please see response to comment I-5-7.

**Response to Comment I-5-10.** The RDEIR presents the water supply and demand for normal years and dry years in separate tables. RDEIR, pp. 4.14-36 to 38. The revised water supply and demand numbers contained in the RDEIR are based on the 2008 WSA. See the Master Response - Water Supply, section I.

For an explanation of the supply differences between normal and dry years, please see response to comment I-5-29.

The analysis of supply and demand in a critical dry year and in multiple dry years is important to the RDEIR's task of providing a complete analysis of future supply and demand, and how future demand will be satisfied during critical dry and multiple dry years. Tables 4.14-12 and -13 of the RDEIR provide revised estimates of cumulative supply and demand for a hypothetical critical dry and multiple dry year based on the 2008 WSA.

**Response to Comment I-5-11.** Please see the Master Response - Water Supply, section I. The RDEIR bases its supply projections on the numbers contained in the 2008 WSA. Further, these supply projections account for potential constraints on supply as described in the Master Response - Water Supply, section IV.

Please see response to comment I-5-7 regarding recycled water.

The RDEIR bases future use of banked groundwater supplies on the water supply amounts shown in the 2008 WSA. For instance, RDEIR Table 4.14-13 (p. 4.14-38) contains the same projections for groundwater supplies as Table 5.4 (p. 21) in the 2008 WSA.

**Response to Comment I-5-12.** Please see the Master Response - Water Supply, section V.D regarding the various agreements and permits mentioned by the commenter.

GWD was involved in the preparation of this RDEIR, and many of the District’s comments and suggestions are incorporated into the document. Please see response to comment R-13-G1 for a description of the District’s involvement.
At the District’s request, the water supply analysis in the RDEIR is based on the 2008 WSA. See the Master Response - Water Supply, section I.

Response to Comment I-5-13. The 2008 WSA is the most current water supply information available for the District and serves as the basis for the water supply analysis in the RDEIR, as requested by the District. While the RDEIR separately calculates the University’s existing water demand for informational purposes (p. 4.14-24), the 2008 WSA provides the water supply and demand numbers upon which the future water supply analysis is based. Please see the Master Response - Water Supply, section I for more information about the use of the 2008 WSA, section V.C for an explanation of the University’s current water demand, and section V.D regarding University permits and agreements.

Response to Comment I-5-14. The analysis of future water supplies and demand in the RDEIR is based on the 2008 WSA. See the Master Response - Water Supply, section I.

Please see the Master Response - Water Supply, section V.D regarding University permits and agreements. Potential future disputes about the cost of water service are not a physical effect on the environment and are not required to be discussed in an EIR (CEQA Guidelines §§ 15064(e) and 15131).

Regarding the proper baseline for this environmental analysis, see response to comment #13.

The District is a responsible agency for this project and has been involved in the environmental review process since it commenced in May 2007, as described in Response to Comment R-13-G1.

Response to Comment I-5-15. Please see the Master Response - Water Supply, section V.C regarding the University’s current water demand.

Response to Comment I-5-16. Please see response to comment I-5-7.

Response to Comment I-5-17. The RDEIR analysis of water supply contains a revised estimate of future supply and demand based on the more-recent 2008 WSA. When assessing future supply and demand, the 2008 WSA projects that agricultural and other customers who are currently using potable water for irrigation will increase their use of recycled water by 50 AFY each year, thus making an equal quantity of potable water available for other uses by offsetting an equal amount of demand. Thus, it is appropriate for the RDEIR to include recycled water as an offset to demand in its tables comparing future supply and demand. Please see the Master Response - Water Supply, section V.A for further discussion of the appropriateness of the RDEIR’s projection of increased recycled water use.

Regarding constraints on Cachuma Project deliveries, please see the Master Response - Water Supply, section IV.A.

Response to Comment I-5-18. The water duty factors for the 2010 LRDP are based on evidence collected by the University regarding water use at its residential facilities. For an explanation of how the water duty factors were calculated for this Project, please see the Master Response - Water Supply, section V.B and response to comment R-13-54.

Response to Comment I-5-19. Please see response to comments I-5-13 and I-5-18.

Response to Comment I-5-20. The projected new potable demand associated with the 2010 LRDP was calculated using the water duty factors as described in the Master Response - Water Supply, section V.B. Regarding this commenter’s concern about water duty factors, please see the response to comment I-5-18.

Response to Comment I-5-21. Please see the Master Response - Water Supply, sections V.D regarding permits and agreements and V.C regarding baseline water demand.
Response to Comment I-5-22. Please see response to comment I-5-18.

Response to Comment I-5-23. The University acquired the Devereux property in 2007, and has not increased the water demand from that property since that time. The 2008 WSA includes total water deliveries to all District customers for 2007, including the Devereux property, in its tables of existing demand. 2008 WSA, p. 15. The RDEIR reasonably relied on the 2008 WSA’s calculations of existing demand.

The analysis in the RDEIR accounts for the future demand from the Devereux property based on the land use changes proposed in the 2010 LRDP. Regarding the appropriateness of the water duty factor for the Devereux property, please see the Master Response - Water Supply, section V.B. Thus, the RDEIR accounts for both current and future demand at the Devereux Property.

The commenter’s concerns about the interpretation of Permit 16 are noted. Potential future disputes about the cost of water service connection fees are not a physical effect on the environment and are not required to be discussed in an EIR. CEQA Guidelines §§ 15064(e) and 15131.

Response to Comment I-5-24. Regarding the calculation of potable demand associated with the 2010 LRDP, please see response to comment I-5-20.

Response to Comment I-5-25. The DEIR properly identifies the Goleta Water District as a responsible agency for this Project. DEIR, p 1.0-8. For a summary of the District’s involvement with the preparation of the DEIR and RDEIR, please see response to comment R-13-G1.

Response to Comment I-5-26. Although not required for the LRDP, Appendix 4.14-1 addresses all of the statutory requirements of a water supply assessment required by SB 610 and SB 221. Please see also response to comment R-13-52.

Members of the public took advantage of many opportunities for involvement in the EIR process, including public hearings held in Isla Vista, the VISION2025 website (which was the forum for electronic comments) and numerous public presentations at various meetings and venues by University officials. The University, moreover, has consulted the GWD regarding the drafting of the DEIR and RDEIR, as explained in response to comment R-13-G1.

Response to Comment I-5-27. Please see response to comment R-13-53.

Response to Comment I-5-27A. DEIR Mitigation Measure W-3A was revised, and is now Mitigation Measure W-3F in the RDEIR. Regarding the feasibility of this measure, please see the Master Response - Water Supply, section VI.B.

Response to Comment I-5-27B. Please see the Master Response - Water Supply, section VI.A.

Response to Comment I-5-28. Please see the Master Response - Water Supply, section II.

Response to Comment I-5-29. The analysis of critical and multiple dry years in the RDEIR relies on the District’s 2008 WSA. Tables 4.14-12 and 4.14-13 in the RDEIR show that during critical dry years and multiple dry years, respectively, the District would be able to augment potable water supplies by pumping a portion of its banked groundwater as explained on RDEIR pages 4.14-3 and 4 and 4.14-13 through -15. (Note that Table 4-14.13 has been revised as discussed in Master Response – Water Supply section IV.A.) These additional supplies are not legally available except in dry years. See the Master Response - Water Supply, section III.D. RDEIR Tables 4.14-2 and 4.14-3 list the different sources of water and the quantities provided by each of these sources for critical dry years and multiple dry years, respectively. By using banked supplies from the SAFE Groundwater Buffer and the Lake Cachuma Buffer, the District will have more water in a single dry year than in a normal year. Regarding the conclusions of the water supply analysis, please see Master Response - Water Supply, section II.
The RDEIR’s projections for State Water Deliveries (in Tables 4.14-12 and -13) match the projections made by the District in its 2008 WSA (Tables 5.2 and 5.4). For critical dry years, both the RDEIR and 2008 WSA project 522 AFY of SWP deliveries, consistent with the most recent analysis of constraints to the SWP deliveries. For multiple dry years, both the RDEIR and 2008 WSA project 2,533 AFY of SWP deliveries.

Response to Comment I-5-30. The RDEIR’s analysis of normal year supply and demand is presented in Table 4.14-11. Table 4.14-11 shows that in a normal year, GWD will have sufficient supply to meet demand from development under the 2010 LRDP and other regional growth in 2025 and 2030.

Response to Comment I-5-31. The RDEIR includes a full analysis of the water supply resources available to serve LRDP-related and other regional growth, including analysis of, and mitigation for, the potential that projected supplies will not be available. The RDEIR also provides a complete analysis of the environmental impacts of using the sources upon which it relies. Please see the Master Response - Water Supply, section VI.A.

Response to Comment I-5-32. Please see Master Response – Water Supply, section VI.B regarding the feasibility of obtaining additional state water.

Response to Comment I-5-33. The University is aware of the water supply challenges in California and has been proactive about conserving water supplies. For instance, [CAMPUS: EXAMPLES]. The RDEIR identifies a number of mitigation measures and conservation strategies to reduce the water needs of the new development associated with the LRDP. Please see responses to comments A-10-13 and -14 for an explanation of the mitigation proposed to reduce the impacts of the LRDP on water supply.

Response to Comment I-5-34. The cost of water service is not a physical effect on the environment and is not required to be discussed in an EIR. (CEQA Guidelines §§ 15064(c) and 15131). Please see the Master Response - Water Supply, section VI.B regarding the feasibility of obtaining additional water supplies.

Based on the analysis in Section 4.14, the RDEIR reasonably concludes that GWD will have sufficient supply in critical and multiple dry years to meet water demand from development under the 2010 LRDP and other regional growth. Please see the Master Response - Water Supply, section II. If the use of recycled water does not increase as the District projected in its 2008 WSA, then a supplemental source of water may be necessary. Regarding the feasibility of obtaining such a source, please see the Master Response - Water Supply, section VI.B.

Response to Comment I-5-35. Page 4.14-50 of the RDEIR references a personal communication with Mr. Gary McFarland of the Goleta Water District in March 2008 in which Mr. MacFarland confirmed that the existing conveyance facilities have sufficient capacity to accommodate the delivery of additional water from the State Water Project above what is currently contracted to agencies in the South Coast area, including GWD. Please see the Master Response - Water Supply, section V.B regarding the feasibility of obtaining additional water.

Response to Comment I-5-36. Please see the Master Response - Water Supply, section VI.B.

Response to Comment I-5-37. Please see the Master Response - Water Supply, section VI.B.

Response to Comment I-5-38. Please see the Master Response - Water Supply, section VI.B.

Response to Comment I-5-39. Please see response to comment I-5-33 regarding the University’s efforts to reduce potable water demand. Please see response to comment I-5-18 and the Master Response - Water Supply, section V regarding the RDEIR’s calculation of future demand.
Response to Comment I-5-40. The RDEIR concludes that the water supply available to GWD would be sufficient to meet demand, so long as the amount of potable water demand offset by recycled water use increases as projected. See the Master Response - Water Supply, section II. By basing its analysis on the 2008 WSA, the University has used the best information available regarding future water supply and demand. If future water demand cannot be offset by recycled water or another new source of water, water demand may exceed supply. Pursuant to Mitigation Measure W-3G, the University will respond to any projected shortfall by adjusting enrollment to ensure that water demand does not outpace supply. Mitigation W-3G relies on the University’s ability to manage future development and the corresponding water demand, and is therefore a feasible measure. For a more detailed discussion of this measure, see the Master Response - Water Supply, section VI.A.

Response to Comment I-5-41. Please see response to comment R-13-63.

Response to Comment I-5-42. Please see response to comment R-13-63.

Response to Comment I-5-43. Please see the Master Response - Water Supply, section V.D.

Response to Comment I-5-44. Please see the Master Response - Water Supply, section II.

Response to Comment I-5-45. Comment noted. Please see response to comment R-13-G1 regarding the District’s role in the EIR process.

Response to Comment I-5-46. The RDEIR concludes that the 2010 LRDP will not result in significant impacts related to water supply following mitigation. Therefore, the alternative proposed by the commenter does address any significant and unavoidable impacts of the Project, and CEQA does not require its consideration.

Moreover, the DEIR analyzes a Reduced Enrollment alternative under which enrollment would increase by 3,000 students rather than the 5,000 proposed in the 2008 LRDP. The DEIR found that this alternative would not eliminate any significant and unavoidable impacts. See DEIR at 5.0-15 through 21. The DEIR further determined that the Reduced Enrollment alternative would not meet the Project’s objective of maturing the academic programs, nor would it allow the Campus to accommodate its share of projected growth throughout the University of California. See DEIR at 1.0-3 through 5, 5.0-21. The suggestion to cap enrollment at 20,000 (current enrollment) similarly would not achieve these goals. Please see response to comment A-17-5.0 Alternatives for a discussion of the adequacy of the alternatives included in the EIR.

Comments regarding the format and organization of the EIR’s analysis are noted.

Regarding the EIR's projections of future demand, please see Master Response – Water Supply, section V.B.

Regarding the future supply available to Goleta Water District, please see master Response – Water Supply, Section IV.

Regarding acquisition of water from the State Water Project, please see Master Response – Water Supply, section VI.B.
To: UCSB, Office of Campus Planning, Vision 2025, Santa Barbara, CA 93106

From: Ms. Phoebe Lenhart, 1518 Castillo, #2B, Santa Barbara, CA 93101

Date: 4-4-2008

Regarding: Land-use requirements through 2025

I am writing in reference to your plans through 2025.

First, I would like to suggest that plans through 2025 are very short sighted and plans should be considered for a period of 100 years or more.

Second, I question the need UCSB has for 1.8 million square feet of new building given the limit of your student enrollment. Is your student enrollment going to increase? What is your justification for so much additional construction?

Further, with mention of more construction on the main campus, Storke and West campus locations, I find your plans have not adequately addressed the issue of traffic congestion and housing.

Please reconsider what you consider a "need" to increase 1.8 million square feet given the impact it will have on the area. Thank you.
Letter I-6
Phoebe Lanhart

No Date

Response to Comment I-6-1. Because the University cannot accurately or meaningfully predict socio-economic changes in a way that would benefit the land use decisions over a period of 100 years, the LRDP uses a 20-year timeline to plan for enrollment growth and campus development.

Response to Comment I-6-2. The expansion of academic and support building space is matched to the increase in student enrollment (approximately 1% growth per year).

Response to Comment I-6-3. The DEIR’s analysis of traffic and housing each take account of all development proposed under the 2010 LRDP. Please see RDEIR at Table 4.10-26 (housing) and 4.13-28 (traffic).
Tristan M. Pritchard
562 Poppyfield Place
Goleta, California 93117
Cell Phone: (805) 636-6626
E-mail: hhunter412002@yahoo.com

May 25, 2008

University of California
Office of Campus Planning & Design
c/o UCSB Vision 2025
Santa Barbara, CA 93106-1030

Dear Sir or Madam:

I am writing to express my opposition to the current planned building expansions that the University of California, Santa Barbara, has under review. I understand this possibility exists in connection with the intent that UCSB plans to expand the number of residences for its students, faculty and administration on its campus and surrounding areas. I am also making suggestions as to how these plans may be made more appropriate to the surrounding vicinity.

As background, I own and live in a property located in the Storke Ranch neighborhood. UCSB’s plans as they are currently outlined would seriously impact the community in a variety of ways.

Specifically:

• The planned razing and subsequent re-build of the Storke Family Housing adjacent to Storke Ranch to the east would have a significant deleterious effect on the density and aesthetics of the area. As the plans currently stand, the intent is to increase the density of proposed housing to a level in excess of five times that of Storke Ranch. This should be adjusted to be compatible with the existing community.

• The height proposal for the proposed housing should be consistent with the existing community and should be constructed so that it avoids blocking the views of the mountains.

• Plans should be made to add 100 feet of green space with trees and other landscaping between the new buildings and Storke Ranch to provide a buffer and enhance views and the bike path.

• The orientation of the units adjacent to Storke Road should be changed such that garages and garbage access are facing away from Storke Ranch to minimize noise impacts.

• Eliminate the student dorm building planned as an addition to the Francisco Torres towers section to be located immediately adjacent to Storke Ranch. At the
very least, some buffer space should be created and the height of the new building should be reduced to match the scale of the Storke Ranch community.

Thank you for taking these concerns and suggestions into account and for protecting our community.

Yours truly,

Tristan Pritchard
Response to Comment I-7-1. One goal of the 2010 LRDP is to provide housing for all new enrollment and employment growth. Increasing the density of Storke Family Housing will help meet that goal. The housing units proposed on the western edge of Storke Campus are single family attached homes, providing a density gradient from the apartments and townhouses to the east and the single family detached homes in Storke Ranch. Mitigation Measure AES-4B has been added to further address issues related to aesthetics and neighborhood transition:

LRDP Mitigation AES-4A: Prior to approval of development projects on Storke Campus under the 2010 LRDP, the UC Santa Barbara Design Review Committee shall review project designs for protection of views to the Santa Ynez Mountains from viewpoints along Storke Road, El Colegio Road, Los Carneros, and roadways within Isla Vista that intersect El Colegio Road, and within and through the Storke Campus.

LRDP Mitigation AES-4B: Prior to approval of Storke Campus development projects, the UC Santa Barbara Design Review Committee shall review project designs to ensure that:

- Campus development along Ocean Road is compatible with the adjacent Isla Vista and Storke Ranch neighborhoods in terms of scale, proportion, appearance, and solar access, as well as preserving existing views to the Pacific Ocean. to the maximum extent possible in light of the LRDP’s housing goals.

- Project development and design on the Storke Campus shall consider ensure the effect of existing and that proposed landscaping does not block on existing views of the mountains or ocean.

Response to Comment I-7-2. The single family attached homes proposed along the westerly border of Storke Campus have a height limit of 20 feet (LRDP, Figure D.4). These properties would be at least 100 feet east of the Storke Ranch subdivision across Access Road. See also response to comment I-7-1. Please note that specific impacts of housing development on the Storke Campus will be subject to project-level environmental review when such development is formally proposed, pursuant to Mitigation Measures AES-4A and 4B. This mitigation will prevent view obstruction from vantage points surrounding Storke Campus at the time Storke Family and Santa Ynez Housing projects are proposed.

Response to Comment I-7-3. The space between the two developments is occupied by Access Road and cannot be used as an open space buffer. As discussed in response to comment I-7-1, Mitigation Measures AES-4A and 4B will reduce the developments’ impacts on views to a less than significant level.

Response to Comment I-7-4. DEIR Section 4.9 analyzes noise effects from the project, including increased traffic on roadways, and concludes that noise impacts will be less than significant with the application of identified mitigation. DEIR at 4.9-26 through 33. In particular, exterior noise levels near Storke Ranch (along Storke Road between Phelps and El Colegio) and Phelps Road will remain at or below the 65 dBA threshold at a distance of 100 feet from the roadway. Reorienting the development as proposed is thus not necessary to avoid or minimize significant impacts of the Project.
Response to Comment I-7-5. Please see the response to comment I-7-1. Although the proposed Santa Catalina Addition will be larger than the neighboring buildings, it will be subject to Mitigation Measures AES-4A and 4B which will prevent and significant impact related to the contrast in building height. No further mitigation is required.
Re: The UCSB2025 plan and the opening of Phelps road to through traffic.

I am writing to express my opposition to the UCSB2025 plan and the consequent opening of Phelps Road to through traffic. The UCSB plan is based on the premise that the increase in number of students will mean an increase of cars on campus and an increased need for car parking facilities and road widening. I live in the Storke Ranch neighbourhood and opening Phelps Road, which is at present a cul-de-sac, to a volume of 7000 cars a day between Storke Road and Mesa Road would raise serious safety issues and impact our community in many ways among which are the following:

1) At present the stretch of Phelps road between Baybrook and the end of the cul-de-sac is very little used for by traffic. The UCSB2025 figures for traffic volume of 2000 journeys a day was presumably a measure of traffic using Phelps Road to enter Storke ranch at Baybrook. Beyond Baybrook to the end of the road there is virtually no traffic. The Play and picnic area in this stretch of Phelps is open to the road and children play on the road in complete safety. This important amenity will disappear or be seriously affected if the UCSB plans go ahead.

2) At present the swimming pool, tennis courts, gymnasium and recreation area border the road and are enjoyed by the community on both sides of the road on the north side of which is affordable housing. Access to these facilities would be seriously impaired if the UCSB plans go ahead.

3) It would increase air and noise pollution from traffic. This would significantly impact the homes and facilities described in 2) above as well as the day care center which borders the road.

Has the University seriously investigated the alternatives to their 2025 plan to increase the provision for conventionally powered vehicles? Already
considerable areas of land on the main campus are given over to car parking. There is a new car park building near the corner of El Colegio and Mesa Road. When will UCSB’s appetite for the internal combustion engine be satisfied. The campus would appear to be tailor made for an integrated transport system and why if we are talking about 2025 are UCSB not planning a solar powered integrated system. There are apparently four nobel prize winners among the faculty members. Surely the University is capable of thinking ‘out of the box’ May I give UCSB an objective to aim at “No cars on campus by 2025”.
To plan for an increase in students and faculty members who will bring their cars onto campus in 2025 is an environmental aberration of the first magnitude and goes against the trend of energy policy everywhere. California leads the USA in the use of solar power. A move by UCSB to a clean integrated system would place the University at the forefront of conservation of the environment and yield dramatic benefits. Not the least of which would be the recovery of large tracts of land on the central campus that could be used for building facilities and accommodation and relieve the pressure to build on outlying parts of the campus. This would further lessen the need for road widening and the provision for increased traffic and the attendant parking facilities.
The UCSB plan makes provision for thousands more cars and parking spaces on campus. They have a duty to explain why they are not actively working on alternative solutions for 2025

Yours,

Cyril Humphris
Response to Comments I-8-1 to I-8-3. Please see Master Response - Phelps/Mesa Connection.

Response to Comment I-8-4. The LRDP aims to provide sufficient housing on campus so that future students, faculty, and staff do not need to use their cars to commute to work or classes. Some students, faculty, and staff, as well as visitors, will continue to use cars. The Campus must therefore provide parking to avoid overburdening surrounding communities. See LRDP at E.6.

The LRDP proposes to achieve this through consolidation of lots, formalization of informal parking areas, construction of parking structures, and development of new lots. A “no cars on campus” policy would simply shift parking to neighboring communities and would not reduce the environmental impacts of development under the LRDP.

The LRDP also provides parking to serve coastal access requirements.

To complement the parking program, the LRDP proposes improvements to infrastructure serving alternative transportation. Please also see responses to comments R-4-19, A-12-48 and A-13-1 regarding transit planning.
July 16, 2008

Dear UC Regents:

As a resident of Storke Ranch, I am very concerned about the impacts of the proposed UCSB Long Range Development plan on Goleta and specifically on our neighborhood, which is surrounded by UCSB property on 3 sides.

One of our largest concerns is the proposed opening of our quiet, cul-de-sac community road, Phelps Road, to through traffic, which is proposed as a traffic mitigation measure in the LRDP EIR. This proposed roadway connection would have significant impacts to traffic circulation, air quality, noise, and environmental justice, none of which were adequately analyzed in the EIR. We strongly feel that the Phelps/Mesa roadway connection should be eliminated from the EIR. Alternatively, the impacts of this roadway connection must be analyzed in a recirculated environmental review document. The inadequacies of the EIR with respect to the Phelps/Mesa connection are outlined in a letter from our attorney, a copy of which I brought for you.

The Phelps/Mesa connection was proposed in the EIR because it is a possible future roadway connection in the Goleta General Plan. And this possible connection is in the Goleta General Plan because it was originally part of a transportation plan in the County of Santa Barbara long before Storke Ranch existed. This possible connection has remained in plans as an artifact despite the fact that it is no longer feasible because of the existing land uses, traffic patterns, and constraints imposed by sensitive receptors in the area, including a daycare center, playgrounds, community pool, tennis courts, and family-oriented residential units. Phelps Road actually divides the community of Storke Ranch and is frequently crossed by pedestrians accessing community facilities and housing on both sides of the road. The opening of the road poses many safety concerns for our community. Also, if connected as proposed, the road would divide a commonly used bicycle path that provides for alternative transportation between West Goleta and UCSB.

In addition, the opening of Phelps road must be analyzed from an environmental justice perspective because there is a low-cost rental housing complex (part of the Storke Ranch Community) immediately adjacent to the proposed connection point that would be disproportionately affected by the roadway connection. This complex is already disproportionately exposed to higher noise levels because it is within the 60 dB noise contour for the airport. The proposed road connection will substantially add to the cumulative noise levels. Also the traffic will threaten the safety of children from the complex who frequently play near and on the road. And the increased vehicle exhaust may threaten the health of these residents.

There are feasible alternative mitigation measures that can substantially lessen the plan’s environmental impacts and must be considered in a revised EIR. Rather than degrading existing neighborhoods by introducing campus traffic, UCSB should enhance public transit as a sustainable solution to its traffic problems. The university needs to consider such forward-thinking solutions that provide an overall benefit to the community rather
than relying on the backward-thinking approach to transportation that is represented by the current EIR.

While the Phelps/Mesa Road connection is a major concern for the Storke Ranch community, it is not the only concern with the plan. We are also very concerned about the university’s plans to tear down and rebuild the family student housing immediately east of Storke Ranch, increasing the density to more than 5 times the density of Storke Ranch and making most of the building space 4-5 stories, and we are concerned about plans to build 3 more buildings on the Francisco Torres site and to build housing on and around the wetlands on the driving range directly across Storke Road from Storke Ranch.

We would like the university to limit the density and height of new buildings in these areas to densities and heights comparable to Storke Ranch in order to maintain the character of the community and to limit impacts to views, air quality, noise, water, traffic congestion, recreational facilities, and the many sensitive wetlands in the area. We also would like the university to create minimum 100 foot vegetated buffer areas between their proposed development and our property and between their proposed development and existing wetland habitats.

There are many sensitive habitats on and around the university’s properties and there is a carrying capacity to this area that I think would be significantly exceeded by adding over 6,700 additional people, resulting in unmitigable impacts to the community and the many sensitive habitat areas in Goleta. I request that the plan be altered to a reduced enrollment level that would limit the number of additional people to a more sustainable level. The number of additional people should be no more than the number that can be served by the existing water supply of the Goleta Water District during a typical drought year.

In conclusion, I am requesting that you, the Regents, ensure that a revised EIR is written and recirculated for public comment and that the revised EIR takes into account the issues I have mentioned and the many other issues which are included in letters submitted during the public comment period.

Thank you for your consideration.

Sincerely,

Kelly Hildner
Storke Ranch Resident
6823 Silkberry Lane
Goleta, CA 93117

Kelly@dock.net
Letter I-9
Kelly Hildner

July 16, 2008

Response to Comment I-9-1. Please see Master Response - Phelps/Mesa Connection.

Response to Comment I-9-2. Please see Master Response - Phelps/Mesa Connection.

Response to Comment I-9-3. The LRDP includes the enhancement of transit, as in the following excerpt (p. 3.0-37):

The transit system at the University will continue to utilize external regional transit service provided by the SBMTD. Under the proposed 2010 LRDP, the bus loop located off of Ocean Road would be reconfigured to provide a clearer, safer transit hub. Additional bus and shuttle stops will be provided in University housing neighborhoods. The University will continue to work with the SBMTD to provide improved bus service to the campus. [emphasis added]

Response to Comment I-9-4. The housing units proposed on the western edge of Storke Campus are single family attached homes, providing a density gradient from the apartments and townhouses to the east and the single family detached homes in Storke Ranch. Mitigation for Impact AES-4 has been amended to further address issues related to building height, aesthetics and neighborhood transition; please see Response to Comment I-7-1.

Reducing the density of the proposed housing would reduce the number of people who could be housed. Therefore, the proposed alternative would prevent the Project from meeting its objective of housing all new Campus population on-Campus. DEIR at 5.0-1. No further of analysis of this alternative is required.

Response to Comment I-9-5. The reduced enrollment alternative and its impacts as compared to the proposed LRDP are addressed in DEIR Section 5.0, at pages 5.0-15 through 20. The alternative would reduce the environmental effects of the proposed LRDP, but would not achieve the University’s objectives.
To whom it may concern:

I am a recent graduate of UCSB, and I would like to make my opinions known regarding the Long Range Development plan. On the whole, I am greatly pleased that there is an effort in progress to improve the sightlines and general aesthetic appeal of the campus. However, there are two elements of that effort to which I am strongly opposed.

First of all, the removal of the eucalyptus curtain along the western border between campus and Isla Vista would have a net negative effect on the surrounding environment. I expect you're going to argue that, since those eucalyptus trees did not grow there naturally. I am aware of that, but nonetheless, the fact is that certain species of birds have adopted them as their habitat, and this must be respected. I ask that as many of those trees as possible be preserved.

Secondly, the removal of Building 406, colloquially known as El Centro, would be a particularly cruel irony. That building has served for many years as a vibrant center of Chicano/Latino life, culture, advocacy, and activism, and has tremendous emotional and sentimental value as a symbol of the Chicano/Latino community. One of the values often expressed there, as in most spaces where activism takes place, is the importance of standing up for one's own people in the face of unwanted pressure from an external system over which one has no control. The LRDP represents such a system.

Sincerely,
Amelia Bowen
Response to Comment I-10-1. The DEIR discusses eucalyptus windrows, at page 4.3-5:

“Large windrows are present on Main Campus at Ocean Road, El Colegio Road, and between Phelps Hall and the Lagoon. Storke Campus has a small windrow along the southern edge of the Stork Wetland, and a large windrow is present along the western border of North and West campuses. Specific locations are shown on Figure 4.3-1. The eucalyptus windrows along the western border of the North and West Campuses contain a Monarch butterfly aggregation area near Devereux Creek (Meade 1999, URS 2004), and provide white-tailed kite nesting areas (URS 2004). Trees used by Monarch butterflies, or that contain active raptor nests are considered sensitive by state and federal agencies.”

The aesthetic value of such trees is further discussed on page 4.1-2:

“Mature trees and other vegetation are the most unifying elements of the Main Campus. The large amount and size of the existing vegetation define the campus aesthetic and in many cases provide cohesion between discordant architectural styles and forms.”

The LRDP does propose to remove the windrows along Ocean Road. Potential impacts to nesting wildlife are discussed in Impact BIO-3, with mitigation to avoid such impacts. In general, impacts and their mitigation, such as BIO-3, along with LRDP policy (ESH-4, ESH-5, ESH-10, ESH-16, as well as SCEN-5 and SCEN-6) are written to ensure that resources such as trees are identified as part of site planning for specific projects, and that measures are undertaken to avoid impacts, where feasible, or to minimize impacts where avoidance is infeasible.

Response to Comment I-10-2. Building 406 has, as the commenter points out, housed El Centro and therefore carries a symbolic importance for the Campus community as a longstanding site of Chicano/Latino activism. The physical replacement of the former Marine Corps Air Corps building, however, would not cause a significant environmental impact because there are a large number of similar buildings, and because the building lacks distinguished architecture. The important programs housed in Building 406 will be housed improved or new facilities that will encourage their continued contribution to Campus life in close proximity to related programs.
I believe you should take Phelps Rd out of the UCSB general plan and instead stop allowing freshman & sophomores to have cars at school.

John Dickson  
6/23/08 9:14pm

Re: LRDP  
SantaBarbara.com [info@santabarbara.com]

Thanks for getting back to me Maggie.

On page 75 of the Draft_UCSB_LRDP.pdf proposal it says:

"Phelps Road may be built between Los Carnereos and Storke roads. These new road segments will reduce demand on El Colegio Road, reduce trips to the El Colegio/Los Carneros intersection, and provide a more direct route to campus from the Storke and Santa Ynez neighborhoods."

The back fence of my home is on Phelps, just west of Storke Campus. Phelps Rd is a quiet dead-end street with just 2 or 3 cars per hour. If you connect Phelps Road to Storke Campus, that will open the floodgates to thousands of cars per hour coming past all the home owners on Phelps, east of Storke Rd.

It will become a noise nightmare and a smog nightmare. Every time I want to drive from my home, I'll be competing with a long line of students' cars choked in our neighborhood. My property value will to drop dramatically.

I would like to know what kind of recourse our neighborhood has about this proposal.

John Dickson  
SantaBarbara.com  
1-800-SantaBarbara
Letter I-11
John Dickson

June 23, 2008

Response to Comment I-11-1. Please see Master Response - Phelps/Mesa Connection.

Response to Comment I-11-2. Please see Master Response - Phelps/Mesa Connection.
May 17, 2008

Gene Lucas
Executive Vice Chancellor
UCSB LRDP

Dear Chancellor Lucas,

The planned UCSB LRDP will have a significant impact on your neighbors in the Storke Ranch residential development.

I am requesting that the distance between the Storke Apartments and the Storke Ranch housing development be increased significantly. Providing a wide greenbelt area would buffer and soften the impact of the Storke Apartments, both in height, sound and size. The tallest buildings in the Storke Campus should be placed closest to Los Carneros, furthest away from Storke Ranch housing. I also suggest that this buffer be planted prior to demolition and construction to mitigate the effects of the resulting pollution.

**Phelps Rd can be made accessible for emergency use without having to open the road to through traffic.** Opening Phelps Road is too large a burden for this community of residents to accept. It will divide our community, affect the health and safety of the Day Care toddlers, the residents of the Storke Ranch Apartments and the Storke Ranch homeowners.

The IVYP Day Care toddler play area is adjacent and extremely close to Phelps Rd. With increased traffic these little ones as well as the children who live in the Storke Ranch Apartments who play along Phelps Rd. would be exposed to constant and serious road pollution in addition to traffic safety concerns. Crossing Phelps would become a serious hazard for the residents of the Apartments going to the pool, fitness center, playgrounds, etc. The increased traffic would create an unsafe environment for the many bicyclists who travel the route and the many parents who walk their children to the Day Care and IV Elementary School as well.

I take issue with the data in the EIR regarding Phelps Rd, and believe a new, more accurate study needs to be done. Bicyclists and pedestrians should be included in the study.

**Widening Los Carneros and El Colegio Roads is the most appropriate solution to accommodate the increased population resulting from your expansion, rather than opening Phelps Rd.** The increased traffic will be caused by, and benefit, UCSB students, faculty, and staff. It is not reasonable for Storke Ranch residents to suffer disproportionately as a result, with poorer air quality, safety issues due to enormous increase in traffic and a community physically divided.
We are proud of the University and it’s outstanding academic reputation. We would be greatly heartened to know our University, that we so highly esteem, will carefully consider the neighbors in Storke Ranch. The impact of your Long Range Plan will have important consequences for generations, so it is important that it be planned and designed considering the needs of all, from the very beginning of the process.

We invite you to come visit Storke Ranch to see our concerns first hand regarding Phelps Rd. and the Storke Campus Apartments. Storke Ranch is a lovely, peaceful and safe community. We should be allowed to retain those qualities into the future.

Ernest Kolendrianos, M.D.
Andriana Kolendrianos
6769 Sweetwater Way
Goleta, CA 93117
805 685-8982 home
805 886-4946 cell
Response to Comment I-12-1. The housing units proposed on the western edge of Storke Campus are single family attached homes, providing a density gradient from the apartments and townhouses to the east and the single family detached homes in Storke Ranch. These homes would be at least 100 feet away from the Storke Ranch subdivision, and are not expected to produce more noise, or noise of a different character, than what is produced by Storke Ranch residents. Mitigation for Impact AES-4 has been amended to further address issues related to aesthetics and neighborhood transition:

LRDP Mitigation AES-4A: Prior to approval of development projects on Storke Campus under the 2010 LRDP, the UC Santa Barbara Design Review Committee shall review project designs for protection of views to the Santa Ynez Mountains from viewpoints along Storke Road, El Colegio Road, Los Carneros, and roadways within Isla Vista that intersect El Colegio Road, and within and through the Storke Campus.

LRDP Mitigation AES-4B: Prior to approval of Storke Campus development projects, the UC Santa Barbara Design Review Committee shall review project designs for:

- Campus development and design along Ocean Road respecting the adjacent Isla Vista and Storke Ranch neighborhoods in terms of scale, proportion, appearance, and solar access, as well as maximizing views to the Pacific Ocean.

- Project development and design on the Storke Campus shall consider ensure the effect of existing and that proposed landscaping does not block views of the mountains or ocean.

Response to Comment I-12-2. Please see Master Response - Phelps/Mesa Connection.

Response to Comment I-12-3. Please see Master Response - Phelps/Mesa Connection.
FW: Questions regarding Santa Catalina  
Karen Ferrara [korief@hotmail.com]

To Whom it May Concern:

I live in the townhouses at Storke Ranch, right across the fence from the Santa Catalina towers. I've read over the UCSB 2025 Vision plan and have some questions regarding the proposed buildings at the Santa Catalina site. In the long term, I hope that UCSB growth will be a positive thing for the City of Goleta. However, in the short term, I fear that the growth will have a negative impact on quality of life and I want to be prepared as much as possible.

My questions are:

1.) Is there a time-line for when the Santa Catalina buildings would be built and how long the construction will take?  
2.) Would the new Santa Catalina buildings house only undergraduate students?  
3.) What would the structures be like? The new San Clemente housing?  
4.) Is there a time in the foreseeable future when they would rebuild the Santa Catalina towers to unify the architecture of Goleta and Santa Barbara?

Thank you for your time and consideration and I look forward to your response.

Sincerely,

Karen Ferrara  
korief@hotmail.com
Response to Comment I-13-1. There is no specific information regarding a timeline or duration for construction of Santa Catalina at this time.


Response to Comment I-13-3. According to the LRDP, the Santa Catalina additions would be in the form of two four-story structures along Storke and El Colegio Roads (LRDP, p. D.13). San Clemente housing would continue the form of the existing San Clemente village housing with 3-story buildings.

The precise design of these buildings has not been developed. Specific information will be provided as part of the project-level environmental review of each new development.

Response to Comment I-13-4. There are no plans in the LRDP to redevelop the existing Santa Catalina towers (formerly Francisco Torres).
To: UCSB Vision 2025

Anyone who has ever walked along the strip of Eucalyptus trees between UCSB and Isla Vista toward the ocean bluff in the early morning or at dusk would be saddened and dismayed by plans to destroy this tranquil area via development. I think that it should be obligatory for those involved in planning the future development of this area to take that walk on a regular basis.

Fred Hofmann
Political Science Dept.
SBCC

6509 Sabado Tarde, #4
Isla Vista, CA 93117
(805)968-9302
Response to Comment I-14-1. The aesthetic value of trees is discussed in the DEIR on page 4.1-2:

“Mature trees and other vegetation are the most unifying elements of the Main Campus. The large amount and size of the existing vegetation define the campus aesthetic and in many cases provide cohesion between discordant architectural styles and forms.”

In general, impacts and their mitigation, such as BIO-3, along with LRDP policies (ESH-4, ESH-5, ESH-10, ESH-16, as well as SCEN-5 and SCEN-6) are written to ensure that resources such as trees are identified as part of site planning for specific projects, and that measures are undertaken to avoid impacts, where feasible, or to minimize impacts where avoidance is infeasible. Any removal of natural features will be subject to subsequent environmental review as the individual projects are proposed. Relevant policies and mitigation measures of the LRDP and EIR shall apply to any sensitive species or features of aesthetic value.
My comments on LRDP:
1) It appears that there is a plan to build several tall new buildings around the perimeter Santa Catalina Residence Hall (formerly known as Francisco Torres). This facility is directly south of my home in Stork Ranch and I can see the facility and grounds from my house.

It appears that one of these new buildings would enclose the southern and eastern borders of the large lawn area east of the existing towers. UCSB currently allows very loud and disturbing United Spirit Association (USA) cheerleading camps to be conducted in this same lawn area that is immediately adjacent to Storke Ranch.

The USA operates this camp from the last week of June through the middle of August each year. We are not even certain this type of loud noise generating operation next to single family housing is even permitted by the local jurisdiction and the USA has never lived up to their promises to keep the noise levels reasonable, with loud cheering, screaming and music on weekends, loud cheering, screaming and music before and after the stated daily start and end times and little or no use of promised noise diminishing equipment or strategies.

Construction of the tall new buildings on the east and south border of the Santa Catalina Residence Hall lawn area will result in all the loud noise and sound being directed straight to the Storke Ranch as the lawn area will now be bordered on all sides by tall buildings, except for the Storke Ranch side.

Given this, and the continued violation of promises to reduce and limit noise by USA, we demand that the United Spirit Association cheer camp be immediately discontinued at this site as a condition of approval for the new buildings.

2) We recommend that any proposed new buildings on the Santa Catalina Residence Hall site perimeter be sufficiently set back from Storke Ranch and reduced in height to be no taller than the adjacent Storke Ranch housing along that shared property line.

Sincerely,

James E. Moore IV
6851 Buttonwood Lane
Goleta CA 93117
805-685-9274
Letter I-15
James E. Moore

5/31/08

Response to Comment I-15-1. The LRDP proposes that the northern side of the Santa Catalina site continue to be used for parking. The large lawn area would be located on the southeastern portion of the site, away from the Storke Ranch housing. The noise impacts of the new configuration, as well as mitigation (potentially including modification to cheer camp) will be considered as part of project-level review of new construction.

Response to Comment I-15-2. The housing units proposed on the western edge of Storke Campus are single family attached homes, providing a density gradient from the apartments and townhouses to the east and the single family detached homes in Storke Ranch. Mitigation for Impact AES-4 has been amended to further address issues related to aesthetics and neighborhood transition:

“LRDP Mitigation AES-4A: Prior to approval of development projects on Storke Campus under the 2010 LRDP, the UC Santa Barbara Design Review Committee shall review project designs for protection of views to the Santa Ynez Mountains from viewpoints along Storke Road, El Colegio Road, Los Carneros, and roadways within Isla Vista that intersect El Colegio Road, and within and through the Storke Campus.

LRDP Mitigation AES-4B: Prior to approval of Storke Campus development projects, the UC Santa Barbara Design Review Committee shall review project designs for:

- Campus development and design along Ocean Road respecting the adjacent Isla Vista and Storke Ranch neighborhoods in terms of scale, proportion, appearance, and solar access, as well as maximizing views to the Pacific Ocean.

- Project development and design on the Storke Campus shall consider the effect of existing and proposed landscaping does not block views of the mountains or ocean.”
Coastal Commission and UC Regents,

In general, I am a supporter of the University of California system. It has been a gift for the state, its students and the country.

That said, I was surprised and disappointed by the general growth plan that was shared with Storke Ranch Community in May. Overall, my disappointment stemmed from a general lack of consideration or anticipation of the concerns local citizens would have. No benefits to the Storke Ranch community were presented, in large part because it appears no one from the planning committee seemed to care about the impact on the community. Not one benefit to the community was cited. What we were told were the benefits to the University.

Below are my concerns:

1. UCSB’s Clear Lack of Concern For the Storke Ranch Community.
   
   From all accounts, the one early conversation that planners had for Storke feedback sounds mostly like a check box they wanted to check with little intention to follow or consider the concerns brought up in the meeting. Given that the majority of housing projects proposed surround the three sides of this community, getting buyin from the community would seem to have been a priority. By ignoring the community here, it leaves the distasteful appearance that the planners believed that they did not have to get support from this community. Degradation in the safety of the people and children that live here, degradation of the transportation on public streets, and decreasing the quality of life in this community was clearly not a concern. The meeting that I went to in May was filled with angry vocal people from the community. And I have to agree with most that the University did not listen to their concerns and have the appearance of trying to avoid conversation with them in the hopes of getting approval somewhere else where the community voice doesn't matter.

2. Safety of Children Not Considered In Plan.
   
   Storke road is already the busiest road in Santa Barbara and it will get busier. The 2 lane to one lane funnel from Francisco Torres sees UCSB students racing each other to get to the front and in so doing putting bicyclers at great risk, not to mention people turning into Willow Glen entrance of Storke Ranch. No additional provision has been made to take into consideration the increase in traffic along a section of a road already dangerous and in close proximity to an elementary school.

   Phelps Road through way puts more kids at risk with more traffic coming right outside the complex. Kids at Storke Community will find themselves surrounded by two heavily trafficked fast flowing streets.

   No thought was given to creating separate bike and walking paths from the road. Instead, UCSB essentially said this was the City's problem.

With increased traffic, it would seem more provisions would be made to protect and enhance bike paths and pedestrian walkways. But UCSB has abdicated and consideration on this topic saying that was the City's responsibility. It was an interesting response, as it seemed to abdicate responsibility for paying for the streets, ironic given that their planning would significantly tax the current roadways and increase dangers to pedestrians and bicyclers.

In the worst kind of irony, UCSB's proposed plans will degrade the lifestyle around Storke Ranch and the twist is that the associated infrastructure costs for road improvements will be borne by Goletans - Storke Ranch Community.

4. Building Size
The buildings proposed in the housing areas appear several stories higher than the Storke houses changing the character of the area. Large student housing peering over smaller single family homes. Changes the character of the place and part of the original reason people moved here.

5. UCSB Good Neighbor Track Record for Storke is Poor.
The Storke Ranch Community spends tens of thousands dollars a year for security guards whose primary purpose is to kick out UCSB kids that have jumped the fence for the community pool or hot tubs. Many seem to come from Francisco Torres and other locations. In addition to the financial impact, it has made some in the community resent UCSB and UCSB has done little to address the issue.

When this issue was brought up, especially with the likelihood of even more students breaking into the gym, pool and hot tub areas, the concerns were dismissed by saying that preliminary plans are for mostly graduate students. No one took comfort in the response. There are no guarantees re: how many more undergraduates will occupy the surrounding areas, and there was no consideration, or offer of an idea around what could be done to discourage this behavior.

6. Personal Interest.
I was surprised to find that when I asked what benefits Storke could expect, it was clear little thought had been given to this. I meant to provide an opening to the presenters to share positives with the community, but they were negligible (coffee shop at new married housing). The bike path sounds ok, but we have access to some pretty good bike paths to UCSB. (I would have liked to have heard thoughts on making Storke more bike friendly.)

It was clear that improved quality of life at Storke was not even up for debate. No one, not even the presenters, could position the new developments as something that would be good for Storke in any shape. What's more, they didn't really seem to care enough to even consider some items that would accommodate any concerns.

Traffic along Storke will make life more dangerous and louder for children. Same goes for opening up Phelps. Apartments behind Storke will now peer over Storke. Finally, any infrastructure costs, or planning associated with accommodating more traffic along Storke and Phelps will be borne by Goletans (Storke community). So
UCSB will create the safety, congestion, and noise problems, and Storke can pay to fix them.

Very disappointed in the process and the lack of even an attempt to sincerely address obvious issues Storke community might have. In fact, UCSB made it clear that even feigning concern for Storke concerns took too much time.

Finally, setting aside the process and lack of interest in listening to Storke, I think there are real issues re: the impact on Safety, Infrastructure Costs and Who Pays, the impact financial and lifestyle wise re: the UCSB students using the facilities, and the change in style of buildings, let alone environmental impacts and issues re: sound are serious items that need to be considered, even if Storke concerns are considered irrelevant.

Albert Oaten
528 Woodleaf Ln
Goleta, CA 93117
805-968-8217
Letter I-16  
Albert Oaten  
5/31/08

Response to Comment I-16-1. Comment noted.

Response to Comment I-16-2. Figures 4.13-4A and 4.13-4B illustrate the proposed bicycle and pedestrian facilities with the LRDP, which includes recreational, separated, and shared routes, and routes connecting with the regional bicycle network. Please see Master Response - Phelps/Mesa Connection. The RDEIR concludes that the Project, with the application of identified mitigation, would have less than significant impacts related to bicycle and pedestrian transportation. RDEIR at 4.13-159 though 161. No further program-level mitigation is required. The application of Mitigation Measure Traffic-7A to specific projects will be considered during the environmental review of each project.

Response to Comment I-16-3. Please see the Master Response – Traffic Fair Share Mitigation regarding the University’s method for calculating its fair share of the cost of traffic improvements.

Response to Comment I-16-4. The housing units proposed on the western edge of Storke Campus are single family attached homes, providing a density gradient from the apartments and townhouses to the east and the single family detached homes in Storke Ranch. Mitigation for Impact AES-4 has been amended to further address issues related to aesthetics and neighborhood transition:

“LRDP Mitigation AES-4A: Prior to approval of development projects on Storke Campus under the 2010 LRDP, the UC Santa Barbara Design Review Committee shall review project designs for protection of views to the Santa Ynez Mountains from viewpoints along Storke Road, El Colegio Road, Los Carneros, and roadways within Isla Vista that intersect El Colegio Road, and within and through the Storke Campus.

LRDP Mitigation AES-4B: Prior to approval of Storke Campus development projects, the UC Santa Barbara Design Review Committee shall review project designs for:

• Campus development and design along Ocean Road respecting the adjacent Isla Vista and Storke Ranch neighborhoods in terms of scale, proportion, appearance, and solar access, as well as maximizing views to the Pacific Ocean.

• Project development and design on the Storke Campus shall ensure the effect of existing and that proposed landscaping does not block on views of the mountains or ocean.”

Response to Comment I-16-5. Trespassing and other illegal activities are not impacts on the physical environment and therefore the EIR does not analyze them. At pages 4.11-17 and 4.11-23 through 24, the DEIR considers the potential physical impacts of increased demand for law enforcement services. It determines that because the increased demand attributable to development under the 2010 LRDP can be met without new or expanded facilities; such impacts will be less than significant.

Response to Comment I-16-6. Comment noted.
Hello,

I am writing to voice my opposition and extreme concern at the proposed connection of Mesa Lane and Phelps Road. I am a resident of Storke Family Student Housing and have a toddler. This proposal threatens children's safety. Please reconsider.

Thank you.
Martha Hines
893 1280

Mrs. Martha Catherine Alter Hines
Response to Comment I-17-1. Please see Master Response - Phelps/Mesa Connection. Please see response to comment I-16-5 regarding illegal activities.
To whom it may concern,

I am extremely dismayed to hear of the plans to join Phelps and Mesa. I live in Storke FSH and we are already subject to all kinds of traffic trying to get to IV. Connecting these roads would endanger our residents even more by allowing traffic through our complex, which has a speed limit of 25 mph that is already difficult to enforce.

Further we have had problems with theft that could be exacerbated by this. Please do not open that fence.

Thank you in advance for your consideration.

Best, Jessica
Jessica C. Murphy
Jessica.c.murphy@gmail.com
Response to Comment I-18-1. Please see Master Response - Phelps/Mesa Connection. Please also see response to comment I-16-5 regarding illegal activities.
To Whom It May Concern,

As a current resident of the Manzanita Village housing complex (located at the end of Ocean Road), with concern for future residents of that complex, I would like to comment specifically on the Ocean Road portion of the Long Range Development Plan. I have several points I would like to make.

1. While it the area could use more regular clean-up and some maintenance, most students find that the bike path along Ocean Road and the various "gateways" into the blocks of Isla Vista are together, an effective transition between the edge of campus and Isla Vista. Students enjoy how effortless and easy it is to travel between the two places, and at Ocean Road, the UCSB campus blends very nicely into Isla Vista, even if it is not classy (but then again, Isla Vista is a college town, not somewhere classy). An expensive, multi-story, brand-new complex (or multiple complexes) with tailored landscaping involving extensive remodel and construction on Ocean Road would not provide an effective transition between Isla Vista and the UCSB campus. In fact, I believe it would create a barrier. Multi-story buildings do not belong on the edge of Isla Vista, neither does expensive, tailored landscaping. Creating this living space would serve to further separate and alienate Isla Vista residents from the community of campus residents (and vice versa).

2. According to the basic drawings, the plan shows development of buildings all the way down Ocean Road past the loop where the road actually ends, right up to the end of Del Playa Drive. Del Playa, as well as El Nido Lane and Sabado Tarde (where building is planned as well) are well-known "party streets" with reputations for being very loud well into the wee hours of the morning. I have personally experienced this noise living in a room with a window that directly faces Del Playa. I strongly doubt that any faculty member would want to live in apartments near those streets (or perhaps near any Isla Vista street, since I would imagine there is a reason that few to no faculty members live in Isla Vista), and the people living in these homes would be closer to the noise than I have been throughout this school year. I also do not think that the people would want intoxicated students, stumbling home to campus, to make their way through their nicely landscaped courtyards and urinate or vomit there, since it is an unignorable fact that this happens, and I have witnessed it myself.

3. A development like the one proposed would affect Manzanita Village and San Rafael residents. We already have boys leering up at us from their Isla Vista apartments, and we do not need our privacy further compromised by having a multi-story complex directly across from us.

In all honesty, a huge development like this, however well-planned, however "beautiful", well-designed, landscaped, and well-maintained, would be an eyesore. From the drawings available the suggested architecture does not fit in any way with campus buildings, and definitely not with the architecture of Isla Vista. As I said before, this development along Ocean Road would be a barrier, not a better transition. I suggest that if this development is deemed "necessary", that its size be limited so as not to extend so close to the ocean.
(and the noisy streets), that its architecture and landscaping be changed or redesigned in order to blend with and accommodate the space and community around it (native plants!), and that the full remodel/construction for Ocean Road (as well as the demolition of the Pardall tunnel, a campus landmark) be reconsidered.

If you have read through all of my comments and gotten this far, I commend you. I hope that you and the rest of the committee in charge of the Long Range Development Plan will take my comments and suggestions, and those of my fellow students, to heart, and seriously consider them in your planning. You will likely never live in Isla Vista or on the UCSB campus, or attend classes here, and we do, every day, and so will the students who follow us.

Thank you for your time.

Sincerely,

Liva Jostad-Laswell
Response to Comment I-19-1. The Ocean Road edge/transition area is defined in Section 4.1 of the EIR as a critical view corridor (Table 4.1-1). In particular, Impact AES-3 addresses impacts related to the transition from Ocean Road to neighboring communities.

LRDP Mitigation AES 3A ensures that development of the Ocean Road area respects adjacent land use in terms of several aesthetic criteria:

Prior to approval of development projects along Ocean Road under the 2010 LRDP, the UC Santa Barbara Design Review Committee shall review project designs for:

- Protection of views to coastal and mountain resources from viewpoints on Ocean Road, roadways within Isla Vista, and along El Colegio Road.

- Campus development and design along Ocean Road respecting the adjacent Isla Vista neighborhood in terms of scale, proportion, appearance, and solar access, as well as maximizing views to the Pacific Ocean.

- Landscaping associated with project development and design along Ocean Road not blocking views of the ocean or hills.

This mitigation will reduce aesthetic impacts related to Ocean Road development to a less than significant level.

Response to Comment I-19-2. The EIR uses a methodology that analyzes noise impacts on a 24-hour basis. That is, it measures all noise in a given area during a 24-hour period and then calculates the average noise level during that time. As explained the DEIR, under this methodology, brief noises are less important than steady, noise-generating activities like motor vehicle traffic. The DEIR thus addresses student after-hours activities as follows (p. 4.9-35, 36) [emphasis added]:

On occasion, complaints have been made about noise resulting from student extra-curricular after-hour activities in the Isla Vista area. These occasional noise-producing events occur irregularly, making them difficult to quantify. Student activities and special events would generally not exceed the 65 dBA 24-hour time weighted Ldn outdoor noise threshold because they predominately take place only for short periods of time.

Response to Comment I-19-3. As discussed in the response to comment I-19-1, the mitigation in the EIR requires that the Ocean Road project be designed in a manner which respects neighboring communities according to a number of criteria. The closure of Pardall tunnel would advance Project objectives by unifying the transportation network and enhancing views and visibility along Ocean Road (see DEIR at 5.0-1) and would not have significant impacts on the environment. The proposed alternative of leaving the tunnel in place would not advance these goals and would not avoid or minimize any significant impacts. No further consideration is required.
Hello,

I am a former UCSB library employee and former resident of Family Student Housing off of Los Carneros. I am a former garden director of the Greenhouse and Garden Project and a founder of the Family Student Housing Tenants Association. I was active with the LRDP planning process through 2004.

On Page 18 the area north of Storke Fields shows an area for "student housing". There is a large parking lot for student housing, but the polygon is oddly shaped and seems to include the recycling and refuse area (near the plumbers shed) as student housing use. This appears to be inaccurate.

On Page 75 there is mention of connecting Phelps Road to Mesa. I am strongly against this proposition as there are many children in Family Student Housing that play near the road in an area that is currently secluded. There are quite a few residences that are right on Mesa that would be exposed to a lot of traffic. If the connection happens, it will be important to design something close to the units on Mesa to protect the children.

Also on Page 75 there is mention of connecting Stadium to Mesa. The area is a wildlife corridor and I urge that this only happens as a way for cars to exit the parking lot during events.

I am relieved to see that the Greenhouse and Garden Project remains green space and look forward to seeing the area improved with collaborations with CCBER.

Thank you for all of your work on the LRDP. Overall, it looks amazing and I am proud to see the native environment and green spaces incorporated into the plan.

Sincerely,
Kristen LaBonte
Letter I-20  
Kristen LaBonte  
6/5/08

Response to Comment I-20-1. No housing or parking is proposed north of Storke Fields and the existing parking lot. (Please refer to LRDP Figure E.1). This area is set aside as part of the greensward that will connect with the Devereux Slough (see LRDP Policy ACC-5).

Response to Comment I-20-2. Please see Master Response - Phelps/Mesa Connection.

Response to Comment I-20-3. Stadium Road and Mesa Road are currently connected. The LRDP proposes a new road connecting the existing driveway off of Stadium Road with Los Carneros Road, skirting the rear of the new housing along El Colegio Road.

The wildlife corridor north of the proposed Stadium-Los Carneros connection (adjacent to the existing park lot north of Storke Fields) would be preserved as part of a greensward connecting with Devereux Slough to the southwest (see LRDP Policy ACC-5).
Hello, my name is Jessie Nieblas and I am a graduating senior at UCSB. I am proud to have served as co-chair of Associated Students Take Back the Night for two years, and was an active member for the other two years of my college career. Take Back the Night has a long and proud tradition in Isla Vista, and we have been able to reach thousands of students through our annual rally. This rally is based in Anis'q'Oyo Park, due to the centrality of the location, the presence of the stage and amphitheater, and the history of the park as a site for progressive activism. Our rally enables survivors to stand up, be heard, and tell their stories. An important element of this dynamic is the public space of the stage and amphitheater, as well as the physical location of the park in "downtown IV." Please consider Take Back the Night and other essential events in evaluating what communities you are serving by altering Anis'q'Oyo Park.

Jessie Nieblas
jessica_nieblas@umail.ucsb.edu
949-973-0762

"Feminism is an entire world view or gestalt, not just a laundry list of women's issues"
-Charlotte Bunch
Response to Comment I-21-1. Anisq’ Oyo Park is not within the University’s jurisdiction; there is no proposal to change the park.
Hello,

My name is Liv Scott. I am a second year at UCSB, and I am a proud member of Associated Students Take Back the Night and have been for the past 2 years. It has been a wonderful tradition in Isla to have the Take Back the Night events, reaching thousands of students via our annual rally which generally takes place the third week of April. The rally is based in Anis'q'Oyo Park, since it is centrally located and presents a wonderful stage and amphitheater. Our rally allows survivors of rape and sexual assault to sound their voices and tell their stories in a safe, supportive environment. The stage and amphitheater are major contributors to that, because during the testimonials at the end of the rally, it makes it more possible to "put the spotlight on" the person who is speaking, because that is the nature of the set-up.

I sincerely ask and urge you to consider Take Back the Night and the other essential events that take place in Anis'q'Oyo Park when you are evaluating what communities you are serving or may serve in Isla Vista and at UCSB by altering it.

Thank you for your time,

~Liv Scott
--
Liv I. Scott
lscott01@umail.ucsb.edu
(310) 897 6468
Response to Comment I-22-1. Anisq’ Oyo Park is not within the University’s jurisdiction; there is no proposal to change the park.
DEIR 4.13 Transportation

Dear Sirs & Madams,

As a Goleta resident, I attended the Goleta City Council meeting, last evening, (6-17) The LRDP was discussed in detail, with the City Staff finding many flaws in the Model, for which all Transportation & Circulation numbers were derived. They announced that their request, to UCSB, for an explanation of methodology had been granted.

Could you please explain why they found problems with your Model, and possibly provide me with the justifying materials that were provided to them? If your position is that the final PM Peak Hour Intersection Operation numbers in the DEIR for The City of Goleta are correct, please confirm the position.

Thank you very much for your attention to this urgent matter!

Respectfully,

David Esparza
President & CEO
Body Tech Fitness Consulting
6820 Shadowbrook Drive
Goleta, CA 93117
ph: 805.452.4280, fax: 805.968.6639
email: bodytech.fc@verizon.net
Letter I-23
David Esparza

6/18/08

Dear UCSB LRDP Reviewers:

While there may be a number of issues that Storke Ranch residents will want to discuss, you will find uncommon and a pointedly heated emotional response by the residents regarding the opening of Phelps Rd. Here are compelling issues you need to be aware of:

1. The opening of Phelps will create a busy street through the middle of our peaceful residential development; houses on one side and the low income development on the other.

2. Traffic estimates by the University estimate that the traffic count on the back half of Phelps (where low income housing is located and the play area of the children) will rise from about 100 cars per day to about 7,500 cars per day.

3. Presently, the lawn areas in front of the low income housing (which are right on the street) are playgrounds for numerous children who are constantly in the street. Our property’s back fence is on Phelps and we are often tossing back balls into the play areas.

4. The Isla Vista Youth Project’s Day Care entrance and playground located on the street and will be directly exposed to traffic pollution.

5. Significant risk to residents will be created who need to walk across Phelps Road (both ways) to access community facilities (tennis courts, swimming pool, gym, orchard, RV parking lot, and play areas), to get to the bus stop (particularly kids going to school), and for those who walk to IV elementary school (low income residents).

6. Residents along Phelps will suffer from the significant rise in levels of air and noise pollution from traffic. This condition is already at maximum levels caused by the airport.

7. Presently, emergency vehicles have free, unencumbered use of the road and the exclusive use of the pass through. This is not an argument for opening Phelps Rd.

8. A potential widening of Phelps to four lanes, eventually would be vehemently opposed by residents. That plan would remove sidewalks, put the road against our back fence, remove plantings and endanger even more the residents of the low income residence. Widening of the road at the intersection would impact the wetland immediately north of Phelps Road and the Storke Ranch property to the south.
9. Another traffic issue during busy travel times that would be created is the exit from the residential community resulting in a significant traffic back up into the community. That back up into a tightly planned community creates safely issues for residents.

10. In the case that Phelps Rd. is opened and there occurs a significant reduction in property values for those whose back yards back up to Phelps, you can count on an organized effort on the part of the residents to “appeal” to the City for compensation.

We also urge you to consider the widening of El Colegio and we encourage the proper distribution of traffic along Storke as traffic approaches El Colegio. That entrance/exit from Storke Ranch is also heavily used and needs to function smoothly within our residential community.

We encourage you to utilize your influence and contacts to oppose this proposal to open Phelps Rd. While other aspects of the UCSB LRDP can be understood and supported, this proposal is unreasonable and dangerous. The residents of Storke Ranch oppose it completely. We urge you to remove the opening of Phelps Rd from your plans!

Respectfully,

Scott M. Haskins
Diana L. Haskins
6812 Shadowbrook Dr.
Goleta

One of 12 homes with back fence on Phelps Rd.
Letter I-24
Scott M. Haskins

6/18/08

Response to Comment I-24-1. Please see Master Response - Phelps/Mesa Connection.
Dear Planners,

I am writing re the brief mention of historic structures in your draft EIR. We have owned and lived in Goleta Valley since 1991 and one of the joys of living in a smaller community is having access, both physically and literally, to its rich historic past. Every month I have been exposed to more and more of this history through reading and visiting sites. While many other coastal communities have lost rich heritage through not-so-carefully planned development, it seems clear that homeowners in the Goleta Valley want to avoid those mistakes and assure that there are tangible markings to our past.

It's in this vein that we ask you to please carefully scrutinize any plans to remove original heritage sites and structures that provide those valuable links to our past and please preserve any significant, or even insignificant (if interesting), buildings and lands that will serve as educational markers for years to come, in particular the Campbell Ranch. We love our Goleta Valley heritage!

Sincerely,

Bonnie and Fred Freeman  
5200 Austin Road  
Santa Barbara, CA 93111  
683-1878
Response to Comment I-25-1. As listed on pages 4.4-12 and 13 of the DEIR, there were 28 sites of cultural significance found in and immediately around campus. Other historical resources are identified in subsection 4.4.5 of the Cultural Resources Section. Impact discussions CULT-1 through CULT-4 address the potential for impacts to cultural, archeological, paleontological, and historic resources, and outline mitigation measures to ensure less-than-significant impacts. Such mitigation includes mandatory pre-construction surveys and construction-halting procedures for resources which are found in the absence of survey evidence. These mitigation measures will apply to any project under the 2010 LRDP that may affect sites associated with Campbell Ranch.
Attached are my comments regarding the ucsb development plans.

To: UCSB Vision 2025 public input info@ucsbvision2025.com; UCSB Chancellor Henry T. Yang; Governor Arnold Schwarzenegger; Jack O’Connell, State Superintendent of Public Instruction

From: Michael and Lisa Scott  
6797 Sweetwater Way  
Goleta, CA. 93117  
mas-scott@cox.net

Date: June 22, 2008

Subject: Our comments to be added to the public comment for the UCSB Draft Vision 2025 Long Range Development Plan (LRDP) and the associated Draft Environmental Impact Report (DEIR).

The eucalyptus windrows of the north and west campus along with the eucalyptus trees within the current Stroke Campus provide aggregation and roosting habitat for both raptors and monarch butterflies. The DEIR is inadequate in that it does not fully describe the importance of the eucalyptus trees as habitat for raptors and monarch butterflies, which is part of the Ellwood Monarch Site Complex, and that the autumnal aggregation and roosting sites within the complex are essential to the success of the Ellwood Main site on Sperling Preserve. The Ellwood site is one of the largest monarch over-wintering sites in the state. The DEIR should further address the scarcity of suitable undisturbed habitats which provide all features necessary to be a successful monarch over-wintering site. The monarch butterfly, although not listed as rare or endangered, is certainly a species of great local importance and of importance to the California Coastal Commission, which is not acknowledged by the DEIR.

The mitigations appear to allow removal of trees that constitute nesting habitat for raptors and that may in fact have been nesting trees in the past. Only protecting active raptor nests is an insufficient mitigation. In addition, the LRDP apparently allows removal of non-native trees, such as eucalyptus if they are not active nest sites for a special status species, but these trees may be essential elements of the total habitat, providing perching locations for foraging activities by raptors and other birds. The LRDP would allow removal of such trees and windrows even when they provide important habitat for monarch butterflies, since monarchs are not listed as a special status species. Monarchs are, however, considered an important local species and their habitat is considered important for protection by the California Coastal Commission. UCSB must not be allowed to look at a eucalyptus tree in the non-breeding season, say it is not an active nesting site, and cut it down. If that were allowed all Snowy Plover habitat could be developed into UCSB faculty housing if demolition began in November.
The DEIR is inadequate in that it does not address the tsunami or earthquake hazards and the additional population that will be exposed to these geologic hazards, including potential inundation by flood waters and high-velocity wave action.

A key consideration is whether the facts, variable assumptions and assertions that run throughout the LRDP and DEIR have been adequately thought-through and documented. Unfortunately, the documents assume away critical problems that the region is facing today and will continue to face throughout the planning period of 2008 – 2025. Of particular note are concerns about the ability to provide sufficient on-campus housing to match and pace growth in population and buildable space, the capacity of public safety systems to readily accommodate that growth, and traffic and circulation impacts that are understated. There are many issues at-hand, but those issue areas, in particular, have spillage affects on Goleta and the valley as a whole that cannot be assumed away. Simply put, the DEIR needs further work and recirculation and the LRDP needs to incorporate mitigation measures accordingly.

The LRDP does not address the question of the amount of water supply that is needed to accommodate an additional on-campus population of 6,736 students, faculty, and staff (plus the family members of faculty, staff, and married students). Nor does it address whether sufficient water supply is presently allocated by GWD or whether additional allocations will be needed. The effects of allocations of additional water on other existing and future customers of the GWD need to be acknowledged as an issue. The UCSB plan will take so much water and add so much traffic that the City of Goleta will not be left with enough resources to adequately plan for its citizens and its own growth.

The LRDP does not directly commit the University to specific projects, funding plans, or construction schedules. Once approved, however, the new LRDP would authorize the University to proceed with the stated increases in students, faculty, and staff. The proposal in the LRDP to accommodate all future increases in students, faculty, and staff in new on-campus housing, rather than in local communities, has the effect of substantially understating what otherwise would be significant and unmitigated environmental impacts if on-campus housing development does not keep pace with increases in students, faculty, and staff. The quoted statement expressly acknowledges that the University will not be obligated to the construction projects identified in the draft LRDP, including the housing construction. The effect would be to shift residential accommodations to off-campus locations, thereby commensurately increasing environmental effects in local communities such as Goleta.

The DEIR identifies the extension of Phelps Road to Los Carneros Road as a planned improvement and acknowledges future operational deficiencies at Storke/Phelps and Los Carneros/Phelps intersections. No mitigation is identified at these locations and no mention is made of the potential impacts associated with creating this new roadway link. Extending Phelps Road simply makes a more direct route for UCSB faculty and staff to go between new UCSB development and the main campus. It does not resolve any traffic issues. In fact it adversely affects several existing intersections along Phelps Road reducing each to a failing grade for noise, pollution, and traffic. It also divides an existing community endangering the lives of residents. The road is currently a dead-end cul-de-sac with an emergency access gate. There are fewer that 35 cars per day on that end of the road. USCB estimates that over 7,000 cars would travel that road once it is opened.
On that road are a day care center, low income housing, a tennis court, a playground, and an RV parking lot. If the road is opened children will die. Those who live will have their long term health endangered. As UCSB admits that the opening of the road will not resolve any traffic problems but simply provide convenience for their faculty it should remain closed. The university should be about educating children not killing them.

In general the housing proposed for the Storke Campus and West Campus is out of character with the neighboring Storke Ranch housing development in size, bulk, scale, and density and should be redesigned to be compatible with the Storke Ranch neighborhood. Impacts to views, air quality, noise, water, transportation, light, glare, and aesthetics should be considered. Due to tripling size of the Storke and West Campus developments and express statements by Gene Lucas that the ground level will be raised 3 to 5 feet prior to construction of 3 and 4 story buildings, a 300 foot vegetated buffer should be incorporated to minimize neighborhood compatibility issues. As active raptor nesting sites, the eucalyptus trees on the Storke Campus should be retained as part of the buffer zone.

One of the stated goals of the LRPD is to reduce traffic. It fails to do so. The LRPD and the DEIR do not adequately analyze the measures that would satisfy the goal.

1. Reduce the amount of planned growth.
2. Move all freshmen and sophomores to dorms on the main campus and prohibit them from brining cars to campus.
3. Work with Goleta, Santa Barbara County, the City of Santa Barbara, and the Isla Vista Redevelopment Agency to develop a truly functional community wide public transportation system.
4. Build a desalinization plant to supply all of the UCSB water needs. Build it on the main campus in a way that does not impede beach access to the surrounding community.
5. Use the combined wisdom of the Nobel Prize faculty to resolve growth and environmental issues rather than profit-oriented administrators whose bonuses depend on growth and profit alone. Take community planning and traffic safety out of the hands of people who place bus stops in the middle of roundabouts.
Response to Comment I-26-1. The DEIR acknowledges the presence of eucalyptus windrows and usage by monarch butterflies and raptors at page 4.3-5:

“Large windrows are present on Main Campus at Ocean Road, El Colegio Road, and between Phelps Hall and the Lagoon. Storke Campus has a small windrow along the southern edge of the Stork Wetland, and a large windrow is present along the western border of North and West campuses. Specific locations are shown on Figure 4.3-1. The eucalyptus windrows along the western border of the North and West Campuses contain a Monarch butterfly aggregation area near Devereux Creek (Meade 1999, URS 2004), and provide white-tailed kite nesting areas (URS 2004). Trees used by Monarch butterflies, or that contain active raptor nests are considered sensitive by state and federal agencies.”

The DEIR also discusses the established wintering sites for monarch butterflies (p. 4.3-20):

“Monarch Butterfly. Monarch butterfly is a state-protected species of concern. Although the monarch butterfly is not threatened with extinction, its wintering sites are vulnerable. A typical wintering site for the monarch butterfly is a grove of trees located in a drainage within a mile of the ocean. Butterflies may roost in a number of different tree types, including but not limited to pines, oaks, sycamores, cypress, palms, and willows. Large Monarch butterfly aggregations occur west and northwest of campus lands on Ellwood Mesa. The Ellwood Monarch Grove consistently harbors between 50,000 and 100,000 butterflies each year (Meade 1999). A satellite wintering site occurs in eucalyptus windrows along the western border of the North Campus (EIP 2004). A eucalyptus windrow near the Devereux School south knoll drainage channel forms a small protected grove area, and is an “important autumnal aggregation site” for Monarch butterfly (Meade 1999). The specific locations of these two occurrences are shown on Figure 4.3-2.”

No projects are proposed that would remove trees in identified monarch butterfly aggregation sites (see Figures 4.3-1 and 4.3-2, in comparison to Figure 3-9).

Mitigation Measure BIO-3D has been added to the EIR, as described in response to comment I-1-3. This measure requires the replacement of any mature trees removed, and therefore will ensure that although trees without active nests may be removed, there will be no significant impact to nesting, perching, or foraging habitat.

Trees are moreover protected through several policies in the LRDP, including ESH-4, ESH-5, ESH-10, ESH-16, as well as SCEN-5 and SCEN-6. Policy SCEN-5 requires a 3:1 mitigation ratio for trees with significant scenic or biological value.

Response to Comment I-26-2. Tsunami hazards are discussed in Section 4.7.1.10. Impact HYD-6 also specifically addresses the risk of inundation from a tsunami and concludes that such events are unlikely.

Risks from faulting and liquefaction are discussed throughout the Geology Section, with all of the impact discussions therein addressing the various geologic hazards to additional population and structures and concludes that the LRDP will have a less than significant impact in this respect.

Response to Comment I-26-3. Indirect effects to surrounding jurisdictions are addressed throughout the EIR. For example, the Population and Housing Section includes Impact POP-3, which addresses impacts of short-term campus housing/population imbalances on surrounding jurisdictions and concludes that they
would be less than significant with the application of identified mitigation. Furthermore, Mitigation Measure POP-3A ensures that on-campus housing keeps pace with enrollment and employment growth.

The LRDP’s impacts related to traffic and public safety are thoroughly analyzed in RDEIR Section 4.13 and DEIR Section 4.11, respectively.

**Response to Comment I-26-4.** Please see Master Response - Water Supply, sections II, IV, V and VI. The RDEIR’s water supply analysis considers cumulative impacts of development within the District by using the water supply and demand projections contained in the District’s 2008 Water Supply Assessment.

**Response to Comment I-26-5.** The LRDP is a program for future development, similar to the general plan of a city or county. Its purpose is not to commit the University to particular, specific development projects, but to outline a broad program of growth for future years. Buildout of such a program could be altered according to financing or environmental constraints. All individual projects part of the LRDP program will be subject to CEQA review, as required. Any alteration of the LRDP or proposal of specific projects not consistent with the LRDP would require an LRDP Amendment, with further CEQA review.

For response to comment regarding population and housing, please see response I-26-3.

**Response to Comment I-26-6.** Please see Master Response - Phelps/Mesa Connection.

**Response to Comment I-26-7.** The housing units proposed on the western edge of Storke Campus are single family attached homes, providing a density gradient from the apartments and townhouses to the east and the single family detached homes in Storke Ranch. Mitigation for Impact AES-4 has been amended to further address issues related to aesthetics and neighborhood transition:

"LRDP Mitigation AES-4A: Prior to approval of development projects on Storke Campus under the 2010 LRDP, the UC Santa Barbara Design Review Committee shall review project designs for protection of views to the Santa Ynez Mountains from viewpoints along Storke Road, El Colegio Road, Los Carneros, and roadways within Isla Vista that intersect El Colegio Road, and within and through the Storke Campus.

LRDP Mitigation AES-4B: Prior to approval of Storke Campus development projects, the UC Santa Barbara Design Review Committee shall review project designs for:

- Campus development and design along Ocean Road respecting the adjacent Isla Vista and Storke Ranch neighborhoods in terms of scale, proportion, appearance, and solar access, as well as maximizing views to the Pacific Ocean.

- Project development and design on the Storke Campus shall ensure that proposed landscaping does not block views of the mountains or ocean.

The various environmental impacts of these developments are discussed throughout the DEIR impact sections (4.1-4.16). For a discussion of tree retention policy and mitigation, please see the response to comment #1.

**Response to Comment I-26-8-A.** The EIR presents feasible alternatives in Section 5.0, including a Reduced Growth Alternative, which limits additional enrollment to 3,000 instead of 5,000 proposed by the LRDP. The environmental implications of this alternative are discussed in subsection 5.2.2.
Response to Comment I-26-8-B. The LRDP aims to provide sufficient housing on campus so that future students, faculty, and staff do not need to use their cars to commute to work or classes. Some students, faculty, and staff, as well as visitors, will continue to use cars. Banning certain classes of students from parking their cars on Campus, or otherwise making parking on Campus more difficult, is unlikely to dissuade them from using those cars; they will instead continue to drive and park in surrounding communities, particularly Isla Vista. The proposed policies would thus increase the LRDP’s impacts related to Isla Vista’s parking shortage while doing little to reduce traffic. Similarly, requiring all freshman and sophomores to live on campus would either require the construction of further housing or displace some of the other students, faculty, and staff that the LRDP aims to house on-campus, leaving them living farther from school or work and more dependent on cars and the infrastructure of surrounding communities. Either of these scenarios would increase the LRDP’s environmental impacts.

Response to Comment I-26-8-C. Please see response to comment A-13-1.

Response to Comment I-26-8-D. As explained in RDEIR Section 4.15 and Master Response – Water Supply, section II, the LRDP will, with the application of identified mitigation, have a less than significant impact related to water supply. No further mitigation is required.

Response to Comment I-26-8-E. Comment noted.
Vicki Brainerd [vickiannbrain@yahoo.com]

To whom it may concern

I am a home owner in Storke Ranch, I was born at Goleta Valley Hospital and raised on Pacific Oaks, my parents still live there. I have watched Goleta and UCSB grow and grow. I feel it is time to listen to the residents of Goleta and keep Phelps closed. It seems that over the years UCSB has been able to expand into the area around the campus and it comes at a great price to the home owners. Student speed down Storke so fast it's scary to think of kids biking or walking to school. My husband, daughter and mom were hit while in there car by a UCSB student who didn't stop and the intersection of Phelps and Pacific oaks. My mom was injured and on crutches for 8 weeks, she would have been killed if he hit 1 second later, car was totaled. I beg you to go and look at Phelps road how peaceful, how many kids are playing in the cul-da-sac at the end. It would truly divide our wonderful community making it unsafe, noisy and more polluted. Please consider the residents of Storke Ranch and of the Married Student Housing when making your decision.

Thank you, Vicki Brainerd
Response to Comment I-27-1. Please see Master Response - Phelps/Mesa Connection.
Dear Campus Planners:

Historic structures are mentioned only briefly in the draft EIR of UCSB’s LRDP. I believe it’s extremely important to preserve and restore the oldest of these from the time the Campbell Ranch was in operation – the early to mid 1900s. It would be money very well spent.

The Campbell Mansion, now referred to as Jacobs Hall, on the Devereux parcel, is one of these structures, as is the Campbell Barn behind I.V. School. Drawings and plans for this unusual barn are in UCSB’s Art and Architecture Archive.

Also significant, and long neglected, is the Spanish colonial-style palomar or dovecote at Coal Oil Point, which dates from the Campbell era. Other artifacts of the Campbells’ presence include the nearby memorial granite cross that marked Colin Campbell’s grave and the brick portals which marked the entrance to the private family cemetery as well as the little beach house with a stone fireplace. The olive trees lining Slough Road and the cypress grove at Coal Oil Point are living legacies of this period in Goleta history.

The Campbells were important members of the community during their time on the ranch, and standout individuals of the era visited and stayed at the ranch.

Two of the university’s researchers have been hard at work documenting the history and ecology of the ranch. They should be heard in the LRDP process.

Thank you,

Martha Lannan
Goleta Valley
Response to Comment I-28-1. The potential historical significance of components of the former Campbell Ranch is noted, including Jacobs Hall, the Campbell Barn behind Isla Vista Elementary School, the dovecote at Coal Oil Point, the granite cross marking the former Campbell gravesite, the brick portals marking the entrance to the family cemetery, as well as the beach house. Also, the significance of the olive trees along the northern portion of Slough Road and the cypress grove at Coal Oil Point is noted.

Please refer to Mitigation CULT-4A of the DEIR. That mitigation ensures future project-level analysis of such cultural assets at the time of project proposal.
To: University of California  
Office of Campus Planning & Design  
c/o Vision2025  
Santa Barbara, CA 93106-1030

I am a resident at Storke Ranch Resident.

I am particularly concerned about the plan to build new housing units on the east side of Francisco Torres grass area. My house directly faces the large grass area.

1. New units are going to block our view and breeze directly coming from ocean.
2. Night lights coming from the windows of new buildings are going to bother us a lot.
3. Reduced size of grass area due to new buildings planned in LRDP, current basketball court, and the swimming pool currently existing, which LRDP plan does not show, will lower quality of life of current and future students. LRDP means putting more people and lower quality of life for everyone in the area and the future residents.

Also, this is going to aggravate current problems we experience at Storke Ranch because UCSB students frequently jump over the wall between F. Torres and Storke Ranch to play on our basketball court and in our swimming pool. Our home association fee covers those behaviors.

Finally, when I talked with a number of UCSB alumni and friends, everyone of them says that their school got ruined by current school officials. Campus looks like an industrial park now, including that ugly artificial main gate. The campus is losing its own natural advantages.

DO NOT BUILD ANYMORE! DO NOT RUIN THE CAMPUS, ENVIRONMENT, and NEIGHBOURS.

Sanggyu Choi  
6845 Sweetwater Way  
Goleta, CA 93117
Response to Comment I-29-1. Locations and orientation of specific buildings has not yet been proposed. At the time that such projects are proposed, impacts to neighboring structures will be analyzed and Mitigation Measures AES-3, 4, 5, 6 and 7 shall apply to all campus development.

The housing units proposed on the western edge of Storke Campus are single family attached homes, providing a density gradient from the apartments and townhouses to the east and the single family detached homes in Storke Ranch. Mitigation for Impact AES-4 has been amended to further address issues related to aesthetics and neighborhood transition:

“LRDP Mitigation AES-4A: Prior to approval of development projects on Storke Campus under the 2010 LRDP, the UC Santa Barbara Design Review Committee shall review project designs for protection of views to the Santa Ynez Mountains from viewpoints along Storke Road, El Colegio Road, Los Carneros, and roadways within Isla Vista that intersect El Colegio Road, and within and through the Storke Campus.

LRDP Mitigation AES-4B: Prior to approval of Storke Campus development projects, the UC Santa Barbara Design Review Committee shall review project designs for:

- Campus development and design along Ocean Road respecting the adjacent Isla Vista and Storke Ranch neighborhoods in terms of scale, proportion, appearance, and solar access, as well as maximizing views to the Pacific Ocean.

- Project development and design on the Storke Campus shall consider ensure the effect of existing and that proposed landscaping does not block on views of the mountains or ocean.”

The various environmental impacts of these developments, such as impacts to law enforcement entities, are discussed throughout the DEIR impact sections (4.1-4.16).

Response to Comment I-29-2. Lighting and glare are addressed in the DEIR by Impact AES-7 and the included mitigation measures which require minimization of spillover lighting. With the mitigation, such impacts would be less than significant.

Response to Comment I-29-3. The DEIR addresses the need for additional recreation facilities with new housing projects in Impact REC-2. With mitigation requiring additional recreation capacity, coastal access, and facilities, impacts would be less than significant.
To whom it may concern:

I am writing because I am very concerned about the proposal to open up Phelps Road to UCSB traffic. I understand that you are hoping to have up to 5,000 new students (which would also mean more faculty and staff as well as housing to handle the extra load); however, opening up Phelps Road is not the answer to the new developments for several very important reasons.

First and foremost, the Isla Vista Youth Projects has a children's center (IVCC) on this road and there is another children's center on the corner of Phelps and Storke. The IVCC children would suffer the most since their playground is only about 10 feet from the road.

Their play area is right on Phelps and because it is a dead end, there is a certain amount of privacy and safety with less noise, pollution and traffic. As a parent, I wouldn't want my child to be there if there were a lot of traffic so close to a playground with toddlers. There is also the consideration of safety for parents dropping off and picking up children since many would have to cross traffic to enter the parking lot.

Second, many home owners in Storke Ranch and other dwellers on Phelps have children and bought there because of the quieter, safer road as well as the easy access to Girsch Park. There is a relaxed family feel to the neighborhood where people walk to and from the park and stores or families ride their bikes with their children. Parents with children in team sports that use Girsch Park can also feel that their children are safer. This feeling would be lost if Phelps opened. In addition, there is also the financial concern to some families that own their homes because opening up Phelps would also cause home values to drop.

Finally, I have lived in the area for almost 28 years and over 20 years in Isla Vista itself. I was an undergrad and grad student at UCSB and I am very familiar with the traffic patterns and problems associated with the area. I don't feel that El Colegio nor Los Carneros and Storke are over-impacted except for certain days of the year (first days of the quarter, move in day and of course Halloween) and there has been a county plan since the 90s to open it up to four lanes with more bus stops and turn lanes which has yet to be realized. The problem at Los Carneros backing up at the light on El Colegio is more of a light timing problem and the fact that El Colegio is only two lanes there. I feel you should direct your attention to El Colegio and opening that up to better accommodate the traffic as well as encourage students and faculty to use public transportation more.

Opening up Phelps is only going to cause more issues, not less. I strongly feel that it would denigrate the quiet family oriented feeling of the neighborhood and cause too many traffic and safety concerns. The money could be better spent providing social services for these additional 5,000 students (police, fire, health, childcare, public transportation).

Opening Phelps should not be an option!

Sincerely,

Danya Wahlberg
Letter I-30
Danya Wahlberg

No Date

Response to Comment I-30-1. Please see Master Response - Phelps/Mesa Connection. The widening of El Colegio Road is complete.
Comment on UCSB draft LRDP
Marie Crusinberry [mcrusinberry@cox.net]

Hello,

Regarding the UCSB draft LRDP, I am writing to voice my opposition to the development of any new parking lot/area in the west end of Isla Vista on Camino Majorca (noted as "optional" on page E.9 Transportation & Parking).

It is a well known fact that beach goers who park on Camino Majorca have a final destination of the beach area at Coal Oil Point and Sands, not the beach below Camino Majorca. There has already been a long existing parking lot at Coal Oil Point and it should be used as such. Any UCSB restrictions on its usage by the public should be lifted.

Parking for beach/trail access has long been available on Camino Majorca below the eucalyptus trees. There is no need to provide a new parking area since this one already exists.

Instead of possibly building a new parking lot on Camino Majorca open space, why doesn't UCSB put to better use the one that already exists at Coal Oil Point?

Thank you.

Sincerely,

Marie Crusinberry
6870 Pasado Road
Isla Vista, CA 93117
Response to Comment I-31-1. According to LRDP Policy Trans-4, “The campus shall allow for up to 80 coastal access permit parking spaces on the North and West Campuses, distributed among four locations; the north entrance to West Campus, the Camino Majorca entrance to West Campus Bluffs, the western terminus of Phelps Road, and at Coal Oil Point.” The parking spaces proposed on Camino Majorca would replace the pre-existing informal parking area on the side of the road, adjacent to the row of eucalyptus trees, at the entrance to the West Campus Bluffs area. There would be no loss of wetlands.

Please see response to comment I-44-27A for information regarding parking at Coal Oil Point.
Dear UCSB Planners,

I understand that today is the last day for submitting comments to the UCSB LRDP. I wanted to add our votes for NOT developing the proposed Camino Majorca parking lot. Ever since the issue first came up, I have been counting the number of cars that are parked on the current dirt strip along Camino Majorca every time I pass by. We live on Fortuna Road, 2 blocks away, and we walk or bicycle by almost daily. There are usually a few cars parked there, but I have never seen the strip filled to capacity, even on good surf days.

The current parking situation works well. Please don’t change anything, and let the peaceful rural environment of Camino Majorca live on.

Thank you for all your effort.

Ann Sanders and Gerry Winant

Ann Sanders and Gerry Winant
6830 Fortuna Road
Isla Vista, CA 93117
(805) 968-6628
anngerry@cox.net
Letter I-32
Ann Sanders & Gerry Winant

No Date

Response to Comment I-32-1. The number of parking spaces at Camino Majorca will not increase. If the Campus pursues this aspect of the LRDP, it would involve only the formal development of the existing informal parking area. Please see response to comment I-2-1 for more information.
June 21, 2008

University of California
Office of Campus Planning & Design
c/o UCSB Vision 2025
Santa Barbara, CA 93106-1030

To Whom It May Concern::

RE: Comments on UCSB LRDP DRAFT EIR

Herewith are comments on portions of the UCSB LRDP DRAFT EIR. The main focus of these comments are the portions dealing with the West Campus.

**Impact AES-5** identifies a likelihood of adverse impact on important views as a result of developments on the West Campus. The proposed mitigation, requires an analysis by the Campus Design and Review Committee of views “from viewpoints along Storke Road, El Colegio Road, Devereux Road and other public roadways and within and through the West Campus.” AES-5A should specifically name “West Campus Point Lane” as a relevant public road. It should additionally specify that the opinions and concerns of stakeholders in the vicinity will be sought and addressed. The mitigation is basically for a Campus agency to “review” impacts, with no commitment to consult stakeholders. There is similarly no commitment to actually change any aspect of the proposed development. The conclusion that the residual impact is “less than significant” is premature and cannot be known at this time.

**Impact AES-6** acknowledges that LRDP development would “substantially alter the visual character of the natural areas of the West campus.” The mitigation again requires
a “review” of effects from “viewpoints...along public roadways.” The mitigation proposed, AES-6A should specifically name “West Campus Point Lane.” The classification of the residual impact as “Less Than Significant” is premature since this cannot be known at this time. AES-6A should specify that the opinions and concerns of stakeholders in the vicinity will be sought and addressed.

**Mitigation AES-6B** concerning the visual character of natural areas—specifically to preserve healthy and mature trees adjacent to natural areas to the greatest extent possible—is vague and inadequate. Both terms “mature” and “healthy” are undefined. (A statement on p. 4.3-11 could be read to indicate that trees younger than 60-80 years are not “mature.” Thus, the removal of a large, healthy 55 year old tree would be permitted on grounds that it is not mature.) Similarly, the specification that concern is limited to trees “adjacent to natural areas” is not clear and may well exclude excellent tree specimens that may be in a developed or previously disturbed area or adjacent to a roadway. Some invasive species such as eucalyptus need not be protected except with respect to raptor habitat. Native species such as slow-growing Coast Live Oak should be extended special protection and care even when, in the opinion of some observers, they are not yet “mature”—i.e. healthy, substantial specimens. (In Santa Barbara County ordinances, oaks “count” when the dbh (diameter at breast height) is as small as 4”. Removal of trees requires multiple replacements.)

**Noise impact NOISE-1** correctly notes that significant and disruptive construction noise will occur—and notes that these may include observations of 70 to 95 dBA at 50 feet. The mitigation does not specify a sound level regarded to be “loud.” Apparently jackhammers operating at least 100 ft away continuously for 12 hours a day would not be prohibited under these provisions. The mitigations should be more definite and more stringent. Surely the mitigation target should be defined more precisely in terms of dBA exposure. The major continuous noise sources should be located at least 200 feet from noise-sensitive land uses and should be allowed to be as close as, but no closer than 100 feet, when the University can present compelling evidence to a neutral 3rd party showing that a more distant location is not possible—not merely that it is more expensive or less convenient.

Further, a 12-hour high-noise window 6 days a week is quite unreasonable. Peace and quiet are essential for human health. High noise activity should be permitted no more than 8 hours a day, 5 days a week.

The assertion that mitigation **NOISE-3A** is “less than significant” is a premature conclusion and not justified at this time.

Related **ESH-23, p. 4.3-37** specifies “A maximum allowable construction or operational sound level of 65 decibels on the A-weighted scale shall not be exceeded as measured from the North or West Campus property lines.” This ignores the fact that noise-sensitive activities (i.e., existing residences and a child care center) are within the West Campus property lines. The plans should explicitly address those constituencies, and the permitted exposures at those locations. If 65 decibels is the correct standard at West Campus property lines, then perhaps that is a maximum permissible level measured at these other noise-sensitive locations within the West Campus.
Hydrology and Water Quality mitigation, HYD-2B addresses the likelihood of surface runoff due to new impervious surfaces which may result in violations of water quality standards. This is critically important given the close proximity to the Slough which is a sensitive environment. Shouldn’t these drain systems be built to a more demanding standard than the 25 year storm? Are these standards consistent with the guidelines articulated in a document entitled “Santa Barbara County Flood Control and Water Conservation District Standard Conditions for Project Plan Approval,” which is available at http://www.sbprojectcleanwater.org/Documents/Annual%20Reports/2006-2007_Annual_Report/B%20-%20Flood%20Control%20Standard%20Conditions.pdf

The related text on p. 4.7-1 states: “The 2008 LRDP would not result in additional development in the North Campus and West Campus with the exception of the former Devereux property (Devereux) that was acquired by the University in 2007 and which was not analyzed in the FFSHOSP EIR. Therefore, the hydrology and water quality analysis in the North Campus and West Campus, with the exception of Devereux, is based on the analysis of the FFSHOSP EIR.” In reviewing the document cited on page 4.7.1, which is this one: (http://facilities.ucsb.edu/_client/pdf/planning_ellwood/documents/2006_NW_Campus_LRDP/UCSB%2090%20LRDP%20text%20with%20_06%20N%20and%20W%20Campus%20Amend.pdf) I do not find any discussion of development on the West Campus, although there is a very detailed analysis of the North Campus. Therefore the sentence from 4.7-1 seems to be inaccurate, and the implication that no further analysis is required of conditions on the West Campus is not justified.

The Cultural Resources impacts with respect to the West Campus Mesa indicates that large portions of the Mesa are likely to be high sensitivity areas (see figure 4-4.3). Oddly, immediately adjacent areas are not classified at all. This seems odd especially given that 4-4.1 indicates that none of the West Campus Mesa has been previously surveyed (also see narrative on pg 4.4-14). Early in the planning process for any development on the West Campus, the University should investigate thoroughly the cultural setting so that developments can be designed to minimize interference with culturally or archaeologically significant materials. The approval of this document should be made contingent on conducting such an assessment.

Impact BIO-3 concerns disturbing of trees that contain active bird nests. This is fine. However, the biological impacts should seek unequivocally to avoid removal of native trees like coast live oak and sycamore whenever possible. The program should also include a statement of intent to replace native trees with approximately equivalent trees when removal is necessary. When invasive or exotic trees are removed, they should be replaced with natives.

Further with respect to the biological impacts, the maps provided reflect a very incomplete accounting of native oaks on the West Campus. See p 4.3-11 which identifies oaks in “small isolated patches on the West Campus Bluffs” and refers to figure 4.3-2. It is important that the record reflect the fact that this document does not provide a complete and up-to-date accounting of West Campus biological resources even in the case of large, easy-to-spot resources like coast live oaks. There are at least 24 coast live oaks on the West Campus as mature as those in the “small isolated patches” identified on the Bluffs. Many are in reasonably close proximity to one another. As near as I can tell,
none of them are recognized as existing for purposes of this report. It is possibly hazardous to identify their specific location, because two specimens on the West Campus Bluffs, previously identified as an area of “oak woodland” have been vandalized (although Campus managers seem not to be aware of, or concerned about, this vandalism). There are several larger and more valuable specimens on the West Campus. The reconfigured roadways near the intersection with Storke and El Colegio raise the prospect of disturbing or destroying several Oak specimens, but they are not clearly depicted in these plans.

The plans for construction of faculty housing on the West Campus Mesa are very unclear and graphics presented in the plan are inconsistent with the written language of the plan. For example, ESH-16 (p 4.3-36) states that “To the degree possible, new faculty housing should be located east of West Campus Point Lane to minimize potential impacts to the Reserve and to avoid archeological resources on the west side of the lane.” This seems like a wise plan, in that it would also maximize the contiguous open space adjacent to Devereux Slough and COPR. This language should be maintained and, if anything, strengthened.

However, compare figure 4.3-4 (and 3-9) in which all the proposed faculty housing is west of West Campus Point Lane. Moreover, the schematic in these figures is completely novel and dramatically different from the schematics that have appeared in earlier drafts of the plan. Indeed, one previous version designated the West Campus Mesa as primarily recreational space. As far as I know, there has been no consultation with West Campus representatives about the details of these plans.

ESH-16 also proposes a setback of only 100 feet for development from Devereux Slough. It would be more meaningful to specify that the setback will be determined, subject to technical analysis, at a distance not less than 100 feet but equal to the distance required to assure that the development has no adverse impacts on the biology of the Slough.

Figure 4.13-7 seems to suggest that an enhanced Devereux Road will extend all the way to Camino Majorca. Surely that is an error. Any increase in traffic on either side of West Campus Point is highly undesirable. Figure 3-11 does not seem to show the same configuration of Devereux Road, but does include the routing of traffic along West Campus Point lane to Seaway Drive. This proposal will dramatically increase traffic along the western border of WCP which will present noise and safety concerns and will be surely met with intense opposition.

Figure 3-5 incorrectly identifies the “existing land use” of the West Campus Mesa as “faculty housing.” The West Campus Mesa is currently open space.

Data in table 3.0-6 suggests that the current recreational space on campus is provided at one acre for every 769 students, which does not seem adequate. The addition of another 5000 students, however, is taken to require only 5 additional acres of recreational facilities—i.e. one acre for every 1000 students. Is the campus currently over-provided with recreational space? What are the comparative statistics for other UC campuses? Is there reason to believe that the new population of students will require less recreational space? The tentative proposed location of the possible addition to recreational space is
actually very far from likely new student residences. That mismatch suggests that this is not a serious attempt to address student recreational needs.

Thank you for your consideration of these points and questions.

Sincerely,
John T. Woolley
Response to Comment I-33-1. The mitigation for Impact AES-5 includes all roads “within and through the West Campus.” This includes West Campus Point Lane; naming specific roads is not necessary.

Future projects, including West Campus developments, will be subject to project-specific environmental review, which will include public comment periods.

Response to Comment I-33-2. Pursuant to Mitigation Measure AES-6A, review of West Campus development projects would consider each project’s “effects to the existing high quality visual character of the natural features of the West Campus from viewpoints along . . . public roadways.” If and when a project is proposed that would have potential effects on views from West Campus Point Lane, such effects would be part of the review that mitigation AES-6A requires. Project specific environmental review will include a public comment period.

Response to Comment I-33-3. Please see response to comment I-1-3 regarding tree removal and replacement policies.

Mitigation BIO-3D has been amended to provide a definition of “mature.” Please see response to comment I-1-3 for details.

Response to Comment I-33-4. Pursuant to Mitigation Measure NOISE-1A, a construction noise mitigation program will be prepared prior to the approval of any individual project, which must include at a minimum the items listed. A portion of these mitigations are included as follows:

- “Loud construction activity (i.e., construction activity such as jack hammering, concrete sawing, asphalt removal, and large-scale grading operations) within 100 feet of a residential or academic building shall not be scheduled during finals week.
- Loud construction activity within 100 feet of a residential building shall be restricted to the hours between 7:30 AM and 7:30 PM, Monday through Saturday.
- Loud construction activity within 100 feet of an academic building shall be scheduled to the extent feasible on weekends.”

The LRDP EIR addresses program-level noise impacts; the program-level mitigation measures are designed to reduce noise impacts to a less than significant level. Specific project mitigations as part of the Noise Reduction Programs will be formulated at the time individual projects are proposed (see Mitigation Measure NOISE-3A, p. 4.9-27).

The following changes have been made to the Mitigation Measure NOISE-1A:

LRDP Mitigation NOISE-1A: Prior to initiation of construction of a specific development project, the Campus shall approve a construction noise mitigation program that shall be implemented for each construction project. This shall include but not be limited to the following requirements:
• Construction equipment used on campus is properly maintained and has been outfitted with feasible noise-reduction devices to minimize construction-generated noise.

• Stationary noise sources such as generators or pumps are located at least 4200 feet away from noise-sensitive land uses as feasible.

• Laydown and construction vehicle staging areas are located at least 4200 feet away from noise-sensitive land uses as feasible.

• Whenever possible, academic, administrative, and residential areas that will be subject to construction noise will be informed in writing at least two weeks before the start of each construction project.

• Loud construction activity (i.e., construction activity such as jack hammering, concrete sawing, asphalt removal, and large-scale grading operations) within 4200 feet of a residential or academic building shall not be scheduled during finals week.

• Loud construction activity, as described above, within 4200 feet of an academic or residential use shall, to the extent feasible, be scheduled during holidays, Thanksgiving break, Christmas break, Spring break, or Summer break.

• Loud construction activity, as described above, within 4200 feet of a residential building shall be restricted to the hours between 7:30 AM and 7:30 PM, Monday through Saturday.

• Loud construction activity within 4200 feet of an academic building shall be scheduled to the extent feasible on weekends.

By requiring a 200-foot buffer, the measure ensures noise levels of substantially less than 70-95 dBA, which, as stated at DEIR 4.9-22, would be experienced 50 feet from the source. The above mitigation would, in effect, be matched to dBA exposure levels, since Impact NOISE-1 mentions noise levels “ranging from 70 to 95 dBA at 50 feet from the source” (EIR, p. 4.9-22). However, as noted in subsection 4.9.2.3, “the exact amount and density of development with respect to sensitive receptor locations is unknown at this time, a quantitative assessment of short-term construction noise was not possible” (EIR, p. 4.9-22). This mitigation would help ensure that this type of construction activity is adequately distanced from sensitive receptors, with restricted hours and days of operation. It will reduce the impact to a less than significant level. No further mitigation is necessary.

Response to Comment I-33-5. LRDP policy ESH-23 addresses noise impacts on sensitive biological receptors, such as nesting birds. Human receptors are addressed in the Noise Section (4.9) of the LRDP EIR. Noise impacts from newly constructed uses and construction on residential uses are addressed in Impacts NOISE-1 and NOISE-4. Note that humans and birds react differently to noise and therefore the relative impacts are discussed in the appropriate sections.
Response to comment #6:
As explained on DEIR pages 4.7-33 through 39, with the application of identified mitigation, development under the LRDP—including West Campus development draining into Devereux Slough—will have a less than significant impact related to stormwater runoff. No further mitigation, including increasing the size of stormwater facilities, is required.

. A discussion of West Campus hydrology appears in the Faculty and Family Student Housing, Open Space Plan, and LRDP Amendment EIR on the following pages: 4.3-13—15, 4.3-18—20, and also throughout the Impact statements of Section 4.3. Impacts related to stormwater runoff and wastewater discharge (Impact 4.3-1, 4, and 5), groundwater supplies (Impact 4.3-2), and erosion (Impact 4.3-3) were all determined to be less than significant, either with or without included mitigation. This prior analysis includes West Campus areas in its significance determinations.

Response to Comment I-33-7. As stated in Mitigation Measure CULT-1B and throughout the discussion for Impact CULT-1 (pp. 4.4-23—28), if there is no prior survey in an area planned for construction, pre-construction surveys will be carried out by qualified archeologists to ensure protection of resources. Please see the cited EIR pages for more information.

Response to Comment I-33-8. Please see response to comment A-3-3.

Response to Comment I-33-9. DEIR Figure 4.3-1 shows general habitat areas, such as oak woodland, while DEIR Figure 4.3-2 shows more specific sensitive resources. Also please note that project-specific surveys will be carried out in accordance with Mitigation Measure BIO-3B and will serve to identify any previously unsurveyed trees. Please see response to comment I-1-3 for information on tree replacement.

Response to Comment I-33-10. The development program represented on DEIR Figures 4.3-4 and 3-9 is consistent with the language in LRDP Policy ESH-16. While that policy states a preference for avoiding development west of West Campus Point Lane “[t]o the degree possible,” it does not bar such development. The proposal to limit faculty housing west of West Campus Lane would not reduce or avoid any of the Project’s significant and unavoidable impacts. The EIR therefore does not consider this alternative.

Response to Comment I-33-11. LRDP Policy ESH-16 proposes a setback of “at least 100 feet.” Specific setbacks for individual projects will be determined during project-specific planning and environmental review.

“ESH-16 In order to protect the character and quality of the Coal Oil Point Natural Reserve, housing structures on the West Campus Mesa shall be set back at least 100 feet from the east edge of Devereux Slough and associated wetland areas.”
(Emphasis added.)

Response to Comment I-33-12. On Figure 4.13-7 the yellow line along Devereux Road shows the boundary of campus property. Road improvements are depicted with a green dashed line; Devereux Road improvements do not extend to Camino Majorca.

Transportation and Noise impacts from proposed road improvements and new roads are addressed in Sections 4.13 and 4.9, respectively.

Response to Comment I-33-13. Figure 3.5 shows existing land use designations for future uses, rather than actual, current land use. The West Campus Mesa is currently designated for faculty housing, although it has not yet been built.

Response to Comment I-33-14. The Campus’s total recreational space includes more than the approximately 26 approximate acres of designated sports fields listed in Table 3.0-6 the commenter used to arise at one acre per 769 students. As stated on page 4.12-24 of the DEIR, under the 2010 LRDP, “the total
acreage of designated recreational space would be increased from 77 acres to 83 acres.” In addition, beaches and other natural areas offer further active and passive recreational opportunities that are not reflected in the acreage tables used by the University or other jurisdictions. These natural resources offer rich recreational opportunities that many other campus environments do not have. Also, the DEIR requires the University to provide recreation facilities in new housing developments. Please see Mitigation Measures REC-2A, 2B, and 2C.
I would like to comment on the UCSB LRDP. I am a resident, recent property owner and business proprietor in Isla Vista and would like to emphasize the importance of protecting our fragile peninsula from overdevelopment. There is a vast increase of hardscape in your plan as well as in the IV Redevelopment plan that will alter the character of our area as well as endanger the existence of flora and fauna. There is also habitat degradation everytime more runoff is created and more trees are felled. The eucalyptus trees are valuable for bird and butterfly habitat and should be slowly removed incrementally over time rather than all at once. Also the mature trees along El Colegio including an oak tree and many cassuaria trees should attempt to be retained- any if possible- rather than all removed.

Why can't UCSB use porous surfaces for sidewalk, bikepath and other improvements? All runoff will go straight to the ocean so more filters should be installed. Roads for traffic through IV to UCSB should be minimized as currently we encourage student, staff & faculty to use their bikes or walk. Freshman should be incentivized to leave their cars at home, and where is the electric shuttle that was approved 8 years ago? In MTD documents it is stated that UCSB said it didn't have the space to charge the bus- how can this institution be so backward as to not provide group transport from campus and IV to Camino Real Marketplace mall? Also why don't you help students get a ride to the train station so they don't have to jam our freeways every weekend?

Why doesn't UCSB use more solar panels? Why aren't they installed at San Clemente Grad. housing? Why does UCSB no longer have its bike auction? Instead of supporting the local community with the bikes it seizes on campus by retaining them in the community through selling them or giving them to local charities or businesses, it sells them to property.com who when our bike shop tried to buy them back from them only furnished us with bogus kids bikes that we didn't even order. Why doesn't UCSB furnish computers, bikes, etc to the local community? Someone from the GIVE sale tried to get us to donate our costly bikes to them. I told them "Why isn't UCSB more of a partner to the community? Why do they take these bikes from students and then not even try to put them back in the community?"

Why does UCSB get a planning consultant company from Philadelphia for it's plan? What does Philadelphia know about biking? Why does UCSB put parking structures away from IV? How is IV going to absorb all this obscene development without even UCSB helping with the parking problem?

Why are you replacing bike lanes with roads? El Colegio will not be pedestrian and bike friendly without MORE sidewalks & bike lanes not just your plan to produce more roadway for cars, and have another grand entrance with blue and yellow flowers The reclaimed water is a great idea but this is our town's entrance road too and should be reflective of a walking/biking emphasis - not just another highway to UCSB. What about increasing your development more into Goleta so as to ease the impact of your growth on the fragile wetlands, ocean and beaches of Isla Vista? Where are organic community gardens in your plan? THAT is the heart of our Isla Vista history- providing sustainable and self contained organic living, surrounding our environment with nature's
bounty all year long. We had a Farmer's Market in IV years ago- how about your plan reflects these principles- you say you want to be sustainable and green THEN REALLY DO IT!! All you have to do is plant organic fruit trees and row crops somewhere and that will be able to provide your school and the community with fresh organic food, like UCSC does.

My son attends UCSB and lives next door to the eucalyptus tree you marked as tree 88, will you restore the area's biological health after you develop by increasing native trees and creating more natural habitat?

How will you minimize water and energy use- will you have opening windows for air circulation or just rely on the AC? Will you work to end unnecessary energy use by turning off lights? Why are so many lights on at San Clemente when no one lives there?

Will you please help to curb the IV redevelopment agency so that it does not destroy our homes and businesses? Their plan seems more harmful than yours and needs your input into the Coastal Commission so that you can grow to your full extent and not have to compete unfairly with the artificially created growth of the redevelopment plan which displaces the local residents and businesses by ridding parking and setback requirements from zoning laws. By trying to relocate the disabled and vulnerable populations that currently live there by upgrading and gentrifying the area, you will be inadvertently increasing auto dependence and commuting because the workers won't be able to afford to live in IV. Latino families and DD individuals do not have such an impact on our town as do more well-off individuals that these plans invite.

Did UCSB really want to destroy our organic community garden in Estero Park to put an Alzheimer's facility there, that would have let no public in to enjoy it's own community park and gardens? That was a horrible idea that I worked hard to defeat. Let us community members be part of the UCSB growth process. I will gladly attend more meetings but their scheduling should be more community friendly, not just one choice that is ill-suited for working families. UCSB has great potential to influence our area positively to withstand economic and environmental hardships. You have alot of capable people in your community. I attended UCSD and my partner is a UCSB grad, as well as my son being an Engineering student and UCSB employee in the CSO and Engineering and Math Dept's. I will be so proud and supportive if we can help each other and the less well off aspects of our population.

There is no crossing guard for my children who attend IV School. Your professors' children go there too- Harry Nelson and Kim Yoshida - we don't want our kids to be hurt-can you get some volunteers or pay for a PT position to see that our kids get across Camino Corto safely? Will you work to retain the churches and social net IV now offers? The Redevelopment agency seems to be trying to push out these intrinsically good samaritans with the plan's aggressive buy-out and relocation strategy. Our bike shops-one on Pardall and one on Trigo are being threatened by the prospect of 4-5 story buildings being approved for development. Where can we go? We supply a crucial need for alternative transportation, why are we unappreciated and ill protected from this inevitable development? Where is your wildlife corridor for the raccoons, skunks, birds, foxes, and bears?
Please work hard to protect the fragile balance of nature, residents, growth and the environment. Put your money where your mouth is and truly develop sustainable, green methods for growth. Fill our town with smart environmentalists, green building and nature preservation and enhancement. And PLEASE help keep the bikes and our bike shops in town so we can help to facilitate your growth and your education to promote green, sustainable living including nurturing organic growing methods for foods and fuels and the nurturing of the people and community that foster you.

Sincerely,

Dorothy Farish Dent - Proud IV Resident and Mother of a UCSB student, 6624 Sueno Road IV CA 93117
Isla Vista Bicycle Boutique 880 Embarcadero del Mar IV CA 93117
Response to Comment I-34-1. Hydrology and runoff impacts are addressed in Impacts HYD-1, 2, 4, and 7. These impacts will be reduced a less than significant level with the identified mitigation. No further mitigation is required.

Response to Comment I-34-2. The LRDP and EIR both recognize the value of eucalyptus and other trees for bird and butterfly habitat. Please see response to comment A-12-60 for more information on impacts and protections related to sensitive habitat.

Response to Comment I-34-3. Please see response to comment I-1-3.

Response to Comment I-34-4. Please see response to comment I-34-1.

Response to Comment I-34-5. Please see response to comment A-12-48 regarding MTD and transit programs.

Further comments unrelated to the adequacy of the EIR are noted.

Response to Comment I-34-6. The LRDP does not propose development in Isla Vista. Parking garages are located near proposed housing developments and academic spaces. The LRDP also proposes to house all new students and employees on campus. Mitigation Measure TRAFFIC-10 commits the University to assist Isla Vista with a residential parking permit program to mitigate the Project's significant impact related to parking shortages in Isla Vista.

Response to Comment I-34-7. As seen in Figure E.2 of the LRDP, bike routes are proposed throughout all areas of campus, including El Colegio Road.

Response to Comment I-34-8. The University does not propose development in Goleta, which is outside its jurisdiction.

Response to Comment I-34-9. The LRDP and EIR documents include many different policies and mitigation measures that promote sustainable growth and use of resources. These policies and measures, however, primarily apply to the program-level impacts of development. Likewise, the LRDP does not propose specific projects. If adopted, specific projects will be proposed in line with the LRDP that will undergo further environmental review. Those projects will contain specific neighborhood proposals such as, as suggested, community gardens.

Response to Comment I-34-10. Please see response to comment I-34-2.

Response to Comment I-34-11. Please see responses to A-10-14, I-5-33 and 32, and O-1-1 for more information regarding University water conservation measures.

Impacts related to energy demand are addressed in Impact UTIL-3 (DEIR at 4.16-19) and would be less than significant. No further mitigation is required.

Response to Comment I-34-12. Proposed development under the 2010 LRDP includes large linked areas of open space intended to allow wildlife movement through the Campus.

Further comments unrelated to the adequacy of the EIR are noted.
Public Comment on UCSB's Vision 2025 Long Range Development Plan

tk chang [tkcdesigns@mac.com]

Monday June 23rd, 2008

To Whom It May Concern ... Greetings! ! !

In reviewing UCSB's Quarter Century Vision 2025 for expansion, we would like to applaud its ambition, however, kindly request the following Urban Design Infrastructures to be visually and physically acknowledged, on a physical, visual, real map, where we, the public, can literally see the broader physical relationships relative to the whole of the whole -- proposed and thus better evaluate a better detailed proposal, rather than a paragraph of words, which means well, but, then again, exactly what, are we talking about. . . ?

• May We, who love the University and all that it can aspire for, have a richer, more visual, more creative, more concrete, more open, more inviting, more delightful, more welcome-ability to interact and exchange with ideas and generations? with innovation and entrepreneurialism? with the past2thefuture in the present? -- may we have a Proposed Local and a County Regional Urban Design Map which designates the Five Rail Depots and Seven Highway Stops as the Solar Transport Power Network? and also that--which integrates the University to the critical urban core corridor spine, the Hollister - State Street - Waterfront Urban Corridor , as

The Current 2008 UCSB LTDP Proposal does not take advantage of the Hollister - Los Carneros Road - El Colegio Road as a MarketPlace of Green Ideas -- an Interface with the Public -- a true "Green" Village

-- whereby the public can benefit by interacting with the University, its most wonderful fortunate guardian staff, and, hopefully, avant gaarde students those at the forefront of acknowledging reality and designing for it;

• the plans do not show provision on how the University connects to the Rail Stations; for real creative alternate transit potential; a visual map is infinitely more telling than a string of words;

• the U LOOP! HUGE opportunities await with this huge university population expansion: a public transportation marketplace corridor connecting the University Campus to the Santa Barbara Waterfront and Train Station; all along El Colegio Road, Los Carneros Road, Hollister Street, the Goleta Rail Depot, the Airport, Goleta Old Town; along Hollister/Noleta to UpTown/Upper State Street; to DownTown/Lower State Street; and to the Waterfront / Train Station --

• something essential, like "the U Loop" MUST BE PROPOSED CONCURRENTLY -- a major transit urban spine connecting the University along a U-shaped corridor to the Santa Barbara Waterfront -- this would be a fabulous symbiotic relationship that could benefit both the University and its local communities; to not take advantage of these fore sights would be truly lost
opportunities for such a vast public investment into a vast physical infrastructure with vast lands and many bright good people;

• How does UCSB's Vision 2025 hook up into a County Network of Solar Electrical Power Hubs for plug-in hybrids located throughout the County? -- vehicles will be a lot, lot smaller -- witness Barney B's new Smart Car! All transportation will be re-conceived to use less energy to move more people -- tiny vehicles ...

The Draft Proposal is a good first start, but perhaps many of its assumptions were still made when gas was still relatively cheap? --

now roads will be more empty off peak --

do we really need wider freeways at great destruction and costs?

Vehicles are getting increasingly smaller, parking spaces will be smaller, and traffic lanes will be smaller -- everything will be smaller in order to use less energy.

Do these plans reflect this very real future barrelling down on us?

We need the University and we would love to go visit it very often and get re-vitalized and re-energized by ideas by interesting thinking individuals -- it would be wonderful if the University could, through real physical urban design, literally invite the public into a wonderful environment where appropriate along Los Carneros and El Colegio Roads to go to shops, cafes', offices, workshops, design studios, sculptors, painters, -- and barter and innovate as well as entreprenure -iate -- wow, wouldn't that be the cat's meow?!

Thank you for inviting the public's comment as the University, and its physical development is so important to each and all of us and could be such a delightful anchor to the Santa Barbara Waterfront to the University to the U LOOP

Thank you, and Best regards,

Sincerely,

T Kiele Chang
tkcDesigns@Mac.com
1.805.705.7950
POB 31093
Santa Barbara CA 93105 USA Earth!
Letter I-35
T. Kiele Chang

6/23/08

Response to Comment I-35-1. Comments noted.
June 23, 2008

From: Kelly Hildner  
6823 Silkberry Lane  
Goleta, CA 93117  

To: University of California  
Office of Campus Planning & Design  
c/o Vision2025  
Santa Barbara, CA 93106-1030  

Dear UC Regents:

Please accept the following comments on the UCSB Draft LRDP EIR.

As a concerned citizen I appreciate that UCSB extended the comment deadline on these documents; however, I would like to request an additional extension of the deadline, as I was unable to complete my review of the EIR in the allotted timeframe. Please let me know if the comment period is extended so I can submit additional comments.

General Comments:

In the LRDP EIR the university does not sufficiently consider the impacts of its growth on the surrounding community especially with regard to transportation and air quality. Mitigation measures focus on transportation of individuals to and from campus but don’t adequately consider the movement of individuals within the community for shopping and other purposes.

Comments on Summary:

Page 2.0-5 The following statement “…LRDP would improve the visual character of developed portions of the Storke Campus when viewed from critical view corridors and viewpoints within and surrounding the Storke Campus” is incorrect. The increased bulk, density, and boxy style of the proposed development would significantly degrade the visual character of the Storke Campus. The campus currently has an attractive Spanish style, has green spaces that help it to blend in with the surrounding natural areas, does not block views of the mountains, and contains many mature trees which enhance the views.

Air quality traffic mitigations TRAFFIC-1, 2, 4, 5, 6 are inadequate. More can be done to eliminate vehicular sources of pollution. Don’t open Phelps road to car traffic, which will encourage more people to drive. Instead, institute a University funded shuttle system (electric) to move people between the main housing areas, shopping, and the university.
Biological Impacts

The biological impacts do not sufficiently address the impacts on wetlands of additional people.

Tarplant mitigation – preserving existing populations should not be considered adequate mitigation for destroying others.

Loss of raptor nesting sites is a significant impact even if the trees are destroyed when there is no active nest.

What is the basis for determining no adverse cumulative impact on biological resources?

Hazardous Materials

HAZ-2A seems inadequate to mitigate release of hazardous materials

Hydrology and water quality

Proposed mitigation seems inadequate to prevent water quality impacts.

Land Use and Planning

LU-6 Opening Phelps road would physically divide the Storke Ranch community

Noise

Noise-1A Loud construction activity restricted to 7:30-7:30 M-Sat. This should be changed to 8am-5pm M-Fri.

Noise-3A Mitigation is not adequate to bring the impact to less than significant.

Noise 4A Provide the allowable hours for truck deliveries in proximity to residential areas and recirculate the EIR for public comment.

Population and Housing

Pop-3 The impacts could be reduced by reducing or capping enrollment at a lower level.

Public services

Pub-2 What is the basis for less than significant impact?
Recreation

There are already significant impacts on the Storke Ranch community from neighboring university housing. More recreational opportunities in the adjacent university housing areas, particularly Jacuzzis and pools are needed to lessen the impacts to Storke Ranch.

Traffic

Traffic-1A
The goal of an overall reduction of 10% of trips to and from campus should be increased to 40% reduction.

Implement university-run shuttle system between campus, housing, and shopping destinations to achieve an overall reduction of 40% of trips to and from campus.

Traffic-10 Parking impacts to Storke Ranch will also likely be significant and should be mitigated.

Water

W-2 What is the basis for concluding that the pumping of groundwater is a less than significant impact?

Wastewater

WW-2 replacement of existing pipelines and conduit. Mitigation should include the removal of pipelines from wetlands (including those at Storke Ranch) and rerouting under roads.

Other Utilities

UTIL-1 This impact could be lessened by lowering enrollment.

UTIL-2 mitigation should include removing utilities from sensitive habitat areas (including those at Storke Ranch) and rerouting them under or alongside roads.

Project Description

Figure 3-5 Extensive open space and recreational areas are incorrectly designated in this map of existing land use as housing, particularly the area between Santa Catalina and Santa Ynez. Some ESHA is missing.
Figure 3-7 Existing Street Network labels some private roads as county roads, including roads within the Storke Ranch community.

Page 3.0-17 Storke Campus Open Land doesn’t mention Storke wetlands or recreational field next to Santa Catalina.

3.0-20 Enrollment growth should take into account that population is not growing as quickly now that baby boomers’ kids are already in school.

3.0-26 4.d. add wetlands to the list of sensitive resources

Figure 3-8 There needs to be more recreation near housing

Figure 3-14 This figure is missing open space south of Storke Ranch between Santa Catalina and Santa Ynez.

Aesthetics

AES 1-9: The mitigations proposed in the EIR are vague and insufficient. Specific analyses of the impacts and the actual mitigations need to be included in the EIR for the public to review. Having the adequate mitigations be determined by a UCSB design review committee is insufficient. Adverse impacts, even if minimized, will likely be unavoidable and significant given the proposed height and density of buildings.

Figure 4.1-24 Missing view corridor along family student housing bike path and bridge

Page 4.1-37 AES-4 Views from the Storke Ranch community and Storke Ranch open space also need to be addressed. Mitigation measures are not sufficient to reduce impacts. The proposed building heights and densities are out of character with the neighboring community of Storke Ranch and would significantly impair views of the mountains from Storke Ranch, from the roadways mentioned, and from the Storke Wetlands. The current Spanish style architecture and the varied distance of buildings from the Storke Ranch property with large vegetated areas adjacent to Storke Ranch are considered preferable to the proposed wall of boxy buildings with incompatible style.

If density and height of proposed buildings are not reduced significantly to be compatible with the adjacent neighborhood, the impact on aesthetics would be significant and unavoidable.

Page 4.1-41 AES-7 Mitigation measures are unlikely to be sufficient to bring the impacts to a level of non-significance given the proposed density and height of buildings in natural areas and adjacent to existing residential areas. Light coming from windows of the buildings will significantly impact nighttime views from adjacent neighborhoods and natural areas.

Page 4.1-42 AES-8: Cumulative impacts are likely to be significant, and proposed mitigation measures are too vague and likely to be insufficient (see above).
Views from coastal wetlands including the West Storke Wetlands, the Storke Ranch Wetlands, the Devereux wetlands, the wetlands adjacent to Francisco Torres, the wetlands just North of Phelps Road on the CDFG property, and the wetlands on the Del Sol and Camino Corto open spaces will be significantly degraded if the proposed density and height of buildings are approved.

Population and Housing

Page 4.10-22 CEQA Guidelines Appendix G Section XII: A project has a significant impact if it will “induce substantial population growth or concentration of population in an area”

Page 4.10-25 Pop-1 The LRDP would substantially increase population growth surrounding the Storke Ranch community in Goleta and result in significant impacts to the neighborhood and to the surrounding sensitive wetland areas. Displacement of individuals and families during the demolition and reconstruction of buildings will have a significant impact on surrounding communities.

Page 4.10-26 POP-2: The potential 4 year lag between housing development and UCSB population growth will have significant and unavoidable impacts on the surrounding communities. Stronger mitigation measures are needed.

Page 4.12-26 REC-2 The dramatic increase in population immediately surrounding the Storke Ranch community will impact recreational facilities in this private development. Currently, students from UCSB periodically jump the fences surrounding community pools and jacuzzis to use the facilities illegally. This use causes significant impacts to the Storke Ranch community, including deterioration of facilities and costs associated with patrol service. Residents of UCSB also use the open space path surrounding the Storke Ranch vernal pool habitat areas, contributing to deterioration of the pathway. These impacts need to be addressed and mitigated.

Pool and jacuzzi facilities are needed in all housing areas surrounding Storke Ranch in order to reduce the impact to the neighboring community.

Transportation and Circulation

The university needs to conduct a transit study and implement/fund improvements to reduce the number of vehicle trips and mitigate impacts to roadways caused by the LRDP growth. Otherwise, the university should cap enrollment at a lower level to prevent unavoidable impacts to the surrounding community.

Page 4.13-21 Figure 4.13-4A This figure should include off-campus bicycle routes, such as the one along Phelps Road. Also, there is a separated bicycle route from El Colegio to Phelps Road that passes family student housing that is not shown; the northern portion is missing. There is also a separated bicycle route along the north side of El Colegio Rd all the way from campus to Storke Road.
The bicycle route along Phelps Road between Mesa Road and Storke Road, an important regional connector, is not shown on the map. This connector is part of a continuous separated bicycle route that connects UCSB to West Goleta. It travels along El Colegio, then north between Storke Ranch and UCSB Storke Family Housing to Phelps Road where it turns left and follows Phelps Road to Storke Road.

Statistics are given for transit use based on a 2006 study. A current study is needed because higher fuel prices may have increased demand.

LRDP Proposed Transit Facilities. UCSB needs to conduct a transit study in coordination with the City of Goleta and Santa Barbara County in order to assess transit needs and improve transit use as an alternative to roadway capacity increases in the EIR.

Table 4.13-23 59% of faculty and staff in the Isla Vista/Goleta area travel to campus by single occupancy vehicle. Better transit options and incentives are needed to encourage alternative transportation use in this group.

To be consistent with California Public Resources Code 30252, UCSB needs to provide better transit options for proposed new development in the coastal zone.

The widening of El Colegio road all the way from UCSB to Storke should be included as mitigation in the EIR, funded by UCSB, and included in the traffic analyses.

The proposed Phelps/Mesa connection would create additional traffic and other environmental problems that have not been analyzed or mitigated. These need to be addressed in a revised EIR that is recirculated to the public. See letters submitted from the Storke Ranch HOA and homeowners.

UCSB should conduct a transit study and fund specific mitigations that will reduce SOV trips by 20-40%. Results of the study and proposed mitigations need to be included in a revised EIR that is recirculated to the public.

See TRAFFIC-2 comment

Water

It is not clear from the information provided that the mitigations are sufficient to reduce the impacts to a level of less than significant. Without specific plans and mitigations, it is not possible for the public to assess the impacts. Please provide detailed information in a revised EIR and recirculate to the public.
Acquisition of water from other south coast member agencies would have significant adverse impacts during drought years.

Page 4.14-32

The Reduced Enrollment alternative should be adopted to ensure that water demand does not exceed supply, especially during drought years.

Wastewater

Page 4.15-4 WW-2A It is not clear from the information provided that the mitigations are sufficient to reduce the impacts to a level of less than significant. Without specific plans and mitigations, it is not possible for the public to assess the impacts. Please provide detailed information in a revised EIR and recirculate to the public.

Relocating sewage pipelines from wetlands (including the Storke Ranch wetlands) to less sensitive areas should be done as part of any maintenance or upgrades.

Other Utilities

Page 4.16-16 UTIL-2 It is not clear from the information provided that the mitigations are sufficient to reduce the impacts to a level of less than significant. Without specific plans and mitigations, it is not possible for the public to assess the impacts. Please provide detailed information in a revised EIR and recirculate to the public.

Relocating sewage pipelines from wetlands (including the Storke Ranch wetlands) to less sensitive areas should be done as part of any maintenance or upgrades to the wastewater system.

Air Quality

The university should adopt alternatives and mitigations that reduce the impacts to air quality. The Reduced Enrollment alternative would lessen the impacts to air quality and should be adopted. Additional mitigation measures, including planning and funding improved transit need to be analyzed in the EIR.

The opening of Phelps Road to through traffic would expose sensitive receptors (daycare center, adult and child learning center, residential housing, and recreational areas) to substantial pollutant concentrations and must be analyzed in a revised EIR that is recirculated to the public.

Creating the Phelps/Mesa connection is inconsistent with promoting pedestrian and bicycle transportation. It would sever a commonly used east/west bicycle route and create unsafe conditions on a commonly used pedestrian and bicycle route. This connection would make it easier and more convenient for people to drive to shopping and to campus and more difficult and less pleasant to walk or bicycle. This is contrary to university stated policy. The university needs to consider ways to promote a pedestrian-oriented bicycle friendly community off campus as well as on campus.
ACC-3 The university should also ensure regular bus and/or shuttle service from campus and campus housing to shopping areas (including the Camino Real Marketplace and the Fairview shopping areas) and downtown.

Discussion of air pollution related to construction does not seem to include exposure to asbestos and mold which are also concerns of Storke Ranch residents near the proposed demolition of the Storke Family Housing site.

Biology

Maps and discussion should include biological resource areas and ESHA that are near campus but not on campus property. These areas are subject to significant cumulative impacts from university development. These impacts and mitigation measures should be addressed in a revised EIR.

Figure 4.3-1 and 4.3-2 and 4.3-3 There are areas of native grassland dominated by Hordeum brachyantherum californicum along the bike path between Santa Catalina and Santa Ynez housing areas that are not shown on the map. Comprehensive, current biological resource surveys are needed to evaluate cumulative impacts to areas surrounding sites of proposed development and should be included in a revised EIR.

BIO-1 It is not clear that proposed mitigations are sufficient to reduce the cumulative and acute impacts of LRDP proposed development on aquatic and wetland resources. The Reduced Enrollment alternative should be pursued as the environmentally preferred alternative.

ESH-23 Add Storke Campus

ESH-5 All mature trees that provide roosting habitat should be preserved on all campuses wherever possible. Development should be planned to avoid the destruction of mature trees.

BIO-3 Removal of trees that provide nesting habitat for raptors will have a significant impact whether or not the removal occurs during the nesting season. There are limited nest sites available and the removal of a suitable tree is significant.

BIO-4 There are likely to be significant cumulative impacts to biological resources from the proposed development in the LRDP. The increase in density of housing and the resulting noise, human disturbance, increase in impermeable surfaces, polluted runoff, pollution from additional vehicle traffic, light pollution, sedimentation, etc. near sensitive biological resource areas is likely to have a significant cumulative impact. Mitigation measures proposed do not adequately address these impacts, particularly the impact of pollution from vehicle traffic on vegetation communities and the impact of direct human disturbance on vegetation and wildlife.

HAZ-2 Residents of Storke Ranch are concerned about potential exposure to asbestos and other hazardous materials during the demolition of the Storke Family Housing. Please address how these hazardous materials will be contained.
Hydrology and Water Quality

Storke Wetlands: It should be acknowledged that the wetlands just east of Santa Catalina are part of the Storke Wetlands.

Thank you for considering these comments on the draft EIR. I will submit additional comments if the comment period is extended.

Sincerely,
Kelly Hildner

Comments on UCSB Draft LRDP

June 23, 2008

From: Kelly Hildner
6823 Silkberry Lane
Goleta, CA 93117

To: University of California
Office of Campus Planning & Design
c/o Vision2025
Santa Barbara, CA 93106-1030

Dear UC Regents:

Please accept the following comments on the UCSB Draft LRDP.

As a concerned citizen I appreciate that UCSB extended the comment deadline on the LRDP; however, I would like to request an additional extension of the deadline, as I was unable to complete my review of the LRDP and EIR in the allotted timeframe. Please let me know if the comment period is extended so I can submit additional comments.

Page B.8 Figure B.6 This figure is missing open space/wetlands and ESHA on Storke Campus

Page B.10 Figure B.7 This figure is missing wetlands and open space south of Storke Ranch and missing wetlands on the west campus bluffs

Page B.12 Figure B.9 – Existing Built Environment shows buildings that haven’t been built.

Page C.6 Figure C.1 Change the symbology to clearly distinguish between the different categories.
Page C.9 second full paragraph, remove the sentence: “The areas closest to the campus, like the Storke Family housing site, will have more apartments and condominiums to house singles and couples, while sites that are farther away and near local schools will have more townhouses and single-family homes.” This is inconsistent with page D.12 which states that the housing at this site will be “for faculty, staff, and graduate student families.”

Page C.5 Please remove infrastructure from the open space category.

Page F.2 Figure F.1 This figure is missing wetlands


Page B.17 Alternatives section lacks off campus alternative transportation options. Add a shuttle system

Page E.12 ACC-3 and 4
Institute a university-run shuttle system instead of relying on MTD

Page F.12 SCEN-9 Add Storke Campus for no invasives

Page F.13 ERO-1, 4 Add Storke Wetlands

**Contradictions**

The items below are inconsistent with the university’s plans to open Phelps Road to through traffic.

Page C.8 bullet 5 “Limit auto routes to the perimeter, with roads that discourage through traffic.

C.11 and C.12 “Create a net-zero greenhouse gas emission campus through energy efficiency, conservation, on-site generation, and…” “Achieve net-zero greenhouse gas emission status for th campus by providing proximate housing for more faculty, students, and staff; decreasing campus travel distances; incrementally changing over to non-petroleum-based transportation; expanding telecommuting and teleconferencing; and effectively integrating emerging technologies.”

Page E.10 Figure E.3 It looks like the university is proposing trails along the edge of our property instead of along the bike path. Please clarify the trail system and how it is expected to cross private property adjacent to UCSB property.

What is the distance between proposed buildings and the Storke Ranch property line? Storke Ranch residents would like a minimum 100 ft vegetated buffer area between new buildings and the Storke Ranch property line to minimize impacts.

Will the university relocate sewer and cables from the Storke Ranch wetlands to more appropriate locations?
Response to Comment I-36-1. The comment period for the DEIR was extended for 45 days.

Response to Comment I-36-2. The recirculated Transportation Section includes extensive analysis of both on- and off-campus traffic. Trip generation rates are discussed starting at page 4.13-64 in the RDEIR, which includes extensive exposition of the rates used, including a description of surveys undertaken to refine them. Also, please see RDEIR Section 4.2 for analysis of impacts to air quality. Impacts AIR-1 through AIR-6 consider the impacts of pollutants on the campus and surrounding population, including sensitive receptors.

Response to Comment I-36-3. Please see response to comments I-1-2 and I-36-26.

Response to Comment I-36-4. Please see the Master Response for the Phelps Road Connection.

Regarding a shuttle system, the LRDP includes the enhancement of transit, as in the following excerpt (p. 3.0-37) [emphasis added]:

The transit system at the University will continue to utilize external regional transit service provided by the SBMTD. Under the proposed 2010 LRDP, the bus loop located off of Ocean Road would be reconfigured to provide a clearer, safer transit hub. Additional bus and shuttle stops will be provided in University housing neighborhoods. The University will continue to work with the SBMTD to provide improved bus service to the campus.

Please see also the response to comment A-12-48 regarding MTD and transit programs.

Response to Comment I-36-5. Impact BIO-1 addresses impacts to wetlands in program-level detail. All subsequent individual projects will be subject to further CEQA review. In general, wetland impacts are caused by physical disturbance, such as encroaching construction, rather than by increased population.

Specific mitigations for impacts to tarplant populations will be determined through environmental review of each individual project. Program level mitigations include the following:

LRDP Mitigation BIO-2A: Development under the 2010 LRDP shall avoid all special-status plant species, including known locations of Southern tarplant to the greatest extent possible.

LRDP Mitigation BIO-2B: If LRDP development is unable to avoid known locations of Southern tarplant, or if development is proposed in an area that provides potentially suitable habitat for tarplant or other sensitive plants, focused botanical surveys shall be performed on the site during the peak blooming season prior to start of construction. The size and location of all identified occurrences shall be mapped on the final project plans, and impact acreages shall be quantified based on proposed limits of disturbance. This impact acreage shall be used to determine the size of mitigation sites to be established for the project. Mitigation area shall be at least at a 1:1 ratio to the disturbed area, or at a higher ratio determined by the responsible agency (CDFG/CCC).

LRDP Mitigation BIO-2C: If LRDP development is proposed within known locations of Southern tarplant, project-specific Tarplant Restoration Plans shall be prepared by a qualified biologist that address tarplant impacts and appropriate mitigation and conservation measures. Conservation measures may include maintaining
existing stormwater inputs to undisturbed populated areas, retention of soil seed banks, seed collection, transplanting of individual plants, plant propagation, and revegetation and preservation of designated mitigation sites in the vicinity of the project site or sites.

**LRDP Mitigation BIO-2D:** Implementation of Tarplant Restoration Plans will be conducted under the direction of a qualified biologist. Restoration shall include initial site preparation, planting, and ongoing maintenance and monitoring efforts. Restoration efforts shall continue for at least five years, and shall be considered successful when a self-sustaining population as evidenced by survival and natural reproduction of southern tarplant is present within the mitigation site. If the mitigation site is a preserve for an existing population, the initial tarplant numbers documented by a focused survey during the peak blooming period will provide the baseline population data. This baseline population number must remain steady or increase over the mitigation period to show establishment of self-sustaining populations on the site. Newly created habitat areas will use the first year tarplant population data as the baseline conditions. This baseline population number must also remain steady or increase over the mitigation period to show establishment of self-sustaining populations on the site.

If avoidance of on-site tarplant populations is infeasible, this mitigation measure would either restore a tarplant population in an area—that is at least the same size as that disturbed by development and that does not currently support tarplant—or provide protection to a currently unprotected population site of the same area. If the second option is selected, ensuring the survival of an otherwise vulnerable population would mitigate for the loss of the on-site population.

The mitigation measures protecting active nest sites are considered adequate to avoid significant impacts to important species. Loss of inactive raptor nesting sites is not considered a significant impact.

The basis for the LRDP EIR’s determination that development under the LRDP will not make a considerable contribution to any significant cumulative impact on biological resources in discussed on page 4.3-42:

*Implementation of the 2010 LRDP will, together with current campus development under the 1990 LRDP, the County’s Ocean Meadows Residences, the City of Goleta Comstock Homes Development, Isla Vista Master Plan, Santa Barbara Airport runway expansion, and other local projects, contribute incrementally to cumulative effects on biological resources within the Ellwood Mesa area, coastal Santa Barbara County, and southern California in general. This combination of existing and proposed development and increasing recreational pressures in the Goleta and Santa Barbara areas is expected to result in a continuing cumulative impact on coastal biological resources. The UC Santa Barbara Coal Oil Point Reserve, Sands Beach snowy plover nesting area, the South Parcel Nature Park, Storke Wetlands, and the West Campus Bluffs provide significant areas of habitat preservation, and some of these areas also provide valuable recreational access. Other land protection efforts within the greater South Coast area, and within the Ellwood-Devereux coast provide areas for coastal habitat and sensitive species protection on a local and regional scale. No mitigation for cumulative impacts other than compliance with all regulations and permit conditions for coastal development is therefore required.*

**Response to Comment I-36-6.** Hazardous materials are monitored and regulated very closely by several levels of government. The University will continue to implement normal operating procedures regarding the control of hazardous wastes related to new construction and to comply with existing regulations. This compliance is sufficient to maintain impacts related to hazardous materials at a less than significant level (DEIR p. 4.6-20 through 25).

**Response to Comment I-36-7.** Hydrology and water quality impacts were analyzed using the most current data available at the time of EIR preparation, and the mitigations included was determined to adequately
reduce the significance of impacts. Individual projects will be reviewed for environmental impacts and more specific mitigations will be put into place at the time of review.

**Response to Comment I-36-8.** Please see Master Response - Phelps/Mesa Connection.

**Response to Comment I-36-9.** Please see response to comment I-33-4 regarding times when loud construction activity will be permitted and changes to Mitigation Measure NOISE-3A.

The DEIR determines that Mitigation Measure NOISE-4B is adequate to reduce impacts related to the intermittent noise disruptions from truck deliveries to a less than significant level. No further mitigation is required.

**Response to Comment I-36-10.** A reduced enrollment alternative is addressed in DEIR Section 5.2.2. Table 5.0-1 summarizes the LRDP and alternatives according to how each would lower significant impacts. A reduced enrollment alternative would reduce many of the LRDP’s environmental impacts. However, it would not meet the Project objective of maturing the academic programs or accommodating the Campus’ share of student enrollment increases for the statewide University of California system. DEIR at 1.0-3 through 5, 5.0-21.

**Response to Comment I-36-11.** The basis for a less-than-significant impact of PUB-2 is explained on DEIR page 4.11-17. In summary, Campus population growth would be housed on-campus and would primarily receive law enforcement services from the Campus police department. New facilities for the Campus department would be included in development under the LRDP. The only off-campus law enforcement agency to experience a substantial increase in demand would be the Isla Vista Foot Patrol. The University and the County are jointly providing an expanded facility for the foot patrol, which is subject to separate environmental review. Thus, growth under the 2010 LRDP will not increase the demand for law enforcement services so as to require new or expanded facilities.

**Response to Comment I-36-12.** The University will be required to provide new recreational facilities with new housing developments (p. 4.12-26; Mitigation Measure REC-2C). As stated on page 4.12-24 of the DEIR, “the total acreage of designated recreational space would be increased from 77 acres to 83 acres.” In addition, beaches and other natural areas offer further active and passive recreational opportunities.

**Response to Comment I-36-13-A.** The Campus’ existing transportation demand management program is already quite successful. As shown in Table 4.13-25, 85 percent of students residing on Campus or in the adjacent Isla Vista and Goleta communities bike, walk or skate to campus and 5 percent take transit. At the same time, the LRDP’s policy of providing housing on-campus for all new campus population will further reduce overall vehicle trips to and from Campus. In addition, the University is only providing 100 new parking spaces for commuters on the Main Campus under the LRDP. Combined, these policies have achieved or will achieve most of the available reduction in single-occupancy-vehicle trips. While the University will continue to strive to reduce vehicle travel to and from campus, further reductions of more than 10% may not be feasible and cannot be guaranteed. The University will continue to strive to reduce single-occupancy vehicle use as much as possible. To this end, Mitigation Measure TRAFFIC-1A(1) has therefore been amended to provide a goal of reducing such trips by “at least 10%.” (Emphasis added.) Please see response to comment A-12-46 for more information on amendments to Mitigation Measure TRAFFIC-1A.

**Response to Comment I-36-13-B.** There is no indication that parking in Storke Ranch by students, faculty, or staff is, or will be, a problem. Storke Ranch is a largely separated enclave with only two entry/exit points, and does not present a convenient option for parking since it is distant from the primary campus facilities. Therefore, there is no reason to believe that significant numbers of University-affiliated drivers will park on Storke Ranch streets when traveling to campus.

**Response to Comment I-36-14.** Please see Response to Comment A-12-56.
Response to Comment I-36-15. In order to reduce the impacts of necessary upgrades, Mitigation Measure WW-2B has been added:

**LRDP Mitigation WW-2B:** The University shall work with the Goleta West Sanitary District to relocate sewer lines currently located in, or under, the Storke Wetlands.

Response to Comment I-36-16. Please see response to comment I-36-10.

See response to comment I-36-15 regarding the replacement of utility infrastructure.

Response to Comment I-36-17. Figure 3.5 shows land use designations for future uses rather than current land.

Response to Comment I-36-18. Comment noted.

Response to Comment I-36-19. Comment noted.

Response to Comment I-36-20. The University of California’s systemwide enrollment projections take into account the state’s demography (p. DEIR 1.0-4 through 5).

Response to Comment I-36-21. Although the quoted statement does not specifically refer to wetlands, its commitment to protecting “sensitive habitat areas” extends to wetlands, as shown by the DEIR’s discussion of wetlands throughout the Biology Section.

Response to Comment I-36-22. Mitigation Measure REC-2C requires that new University housing developments include recreation facilities.

Response to Comment I-36-23. Figure 3-14 shows areas designated as open space under the LRDP. Other undeveloped areas, designated for other uses, may function as open space.

Response to Comment I-36-24. The LRDP is a broad, program-level outline for development and the DEIR analyzes its impacts at a program level. As individual projects are proposed, they will be subject to CEQA review. This analysis will consider project-level impacts and, where necessary, propose appropriate mitigation.

Response to Comment I-36-25. The identification of views is a somewhat subjective task, and this task was accomplished with walking surveys during preparation of the EIR. The survey was not meant to compile an exhaustive list of every possible view, but to record those of the highest quality and notoriety.


Response to Comment I-36-27. Program-level mitigation for light and glare includes the following [emphasis added]:

**LRDP Mitigation AES-7A:** Lighting for new development projects shall be designed to include directional lighting and shielding to minimize light spillage and atmospheric light pollution. This lighting should be compatible with the visual character of the surroundings.

**LRDP Mitigation AES-7B:** The UC Santa Barbara Design Review Committee shall require the incorporation of measures into the project design to limit light and glare to the extent feasible.
LRDP Mitigation AES-7C: The UC Santa Barbara Design Review Committee shall review outdoor lighting plans and fixtures for parking facilities, roads, and pathways to ensure that the minimum amount of lighting needed to achieve safe routes is used, and to ensure that the proposed illumination limits adverse effects on nighttime views.

These mitigation measures will reduce light and glare impacts to a less than significant level by ensuring that outside lighting directs light down and not towards neighboring buildings. In accordance with Mitigation AES-7B, project level environmental review will analyze opportunities for glare based on specific building characteristics and orientation. That level of review is impossible at this point, since no specific projects are being proposed at this time.

Response to Comment I-36-28. Mitigation Measure AES 3A will ensure that impacts related to views from coastal wetlands will be less than significant by ensuring that development projects are subject to a design process that will consider visual impacts. Project-specific impacts will be addressed as each individual project is built, with mitigation tailored for each unique situation.

Response to Comment I-36-29. See response to comment I-36-27.

Response to Comment I-36-30. Comment noted.

Response to Comment I-36-31. For a discussion of population growth, see Impacts POP-1 and POP-2. All impacts are considered less than significant, primarily because 1) all direct growth (new students and new faculty and staff) will be accommodated for on campus; and 2) the LRDP would not extend infrastructure off-campus. Temporary impacts related to construction are addressed in the relevant topical EIR sections. One of the standards of significance employed for determining impacts to population and housing is whether the project would cause the “displacement of substantial numbers of existing housing necessitating the construction of replacement housing elsewhere” (Appendix G, section XII of the CEQA Guidelines). Impact POP-3 analyzes this impact, and includes mitigation for the potential leasing of off-campus housing facilities in the case of the on-campus housing supply not meeting the needs of current enrollment. Such measures would serve as temporary alleviation until permanent housing construction is finished.

Response to Comment I-36-32. Please see response to comment A-12-1.

Response to Comment I-36-33. Regarding illegal activities, please see the response to comment I-16-5.

All new housing will include recreational facilities in accordance with Mitigation Measure REC-2C. As the DEIR determines at pages 4.12-26 and 27 this and other identified mitigation will reduce the LRDP’s impact on off-campus recreation facilities, including trails, to a less than significant level.

Response to Comment I-36-34. The LRDP EIR includes a traffic study and numerous mitigation measures to reduce vehicle trips and traffic impacts (see Mitigation Measures TRAFFIC-1A, 2A, 3A, 4A, 5A, and 6A). Please also see Master Response – Fair Share Traffic Mitigation regarding mitigation measures concerning the University’s contribution to traffic improvement funding. In addition, Mitigation Measure TRAFFICIC-1A(1) has been amended as set out in response to comment A-12-46.

Response to Comment I-36-35. Figure 4.13-4 only depicts on-campus bicycle facilities, which are the only routes over which the University has control.

Response to Comment I-36-36. Please see the response to comment I-36-35.

Response to Comment I-36-37. Current gas prices are comparable to 2006 levels (source: www.eia.doe.gov). Please see response to comment I-36-34.
Response to Comment I-36-38. Please see response to comment A-12-48.

Response to Comment I-36-39. Please see response to comment I-36-34.

Response to Comment I-36-40. Please see Impact REC-3 (p. 4.12-27) for a discussion of public coastal access. The LRDP includes the facilitation of the provision of transit service throughout the development, as discussed throughout recirculated Section 4.13.1.3. Transit system improvements include the following (p. 4.13-28):

The LRDP proposes to reconfigure the existing bus loop along Ocean Road. The new bus loop would be located just north of the existing bus loop and would provide increased capacity for bus boardings and alightings and improved safety and convenience for passengers. Bus turnarounds would also be constructed at the southern end of Ocean Road and western end of UCen Road to provide nearby transit service to the Ocean Road Housing complex and east and west campus residence halls. In addition, UC Santa Barbara would continue to work with SBMTD to provide bus service to the campus.

Response to Comment I-36-41. As noted on page 4.13-64 of the recirculated Transportation Section, the 2025 LRDP “analysis assumed the widening of El Colegio Road to four lanes between Los Carneros Road and Stadium Road.” The western-most portion of El Colegio is already four lanes, and as of March, 2009, the center portion from Camino Corto to Los Carneros was being widened. This project is not a part of the LRDP.

Response to Comment I-36-42. Please see Master Response - Phelps/Mesa Connection.

Response to Comment I-36-43. See response to comment I-36-34.

Response to Comment I-36-44. The EIR recognizes that the construction of new water infrastructure to serve the project would result in significant impacts without mitigation. RDEIR, pp. 4.14-26 to 4.14-30. To mitigate for the impacts of constructing new water infrastructure, the EIR identifies numerous mitigation measures, which are cross-referenced on pages 4.14-26 to 4.14-27 of the RDEIR. These mitigation measures address air quality, biological, cultural, geological, hazardous materials, hydrology, and noise impacts, and will reduce the impact of constructing the water infrastructure associated with the LRDP to a less-than-significant level.

The DEIR includes the construction of infrastructure improvements in the project description (DEIR p. 3.0-48), and fully analyzes the construction impacts of the proposed 2010 LRDP throughout the DEIR and RDEIR. See EIR, pp. 4.3-29 to 42 and 4.2-30 to 37.

Response to Comment I-36-45. The RDEIR discusses the possibility of acquiring water from other agencies on pages 4.14-45 to 48. In order to purchase or acquire such water, the University would need to find a willing seller with surplus water. Because such an acquisition would not require any changes in the State Water Project itself and would involve water that is not needed to serve the needs of the entity providing the water, the acquisition would not have significant impacts related to water supply. Please see Master Response - Water Supply, section VI.B regarding the feasibility of such an acquisition.

Response to Comment I-36-46. Please see Response to Comments I-5-46 and O-17-3.

Response to Comment I-36-47. The LRDP EIR considers impacts and mitigation measures a broad program level. More specific impacts and mitigations will be analyzed and proposed through project-specific environmental review of individual projects.

Storke Ranch is not part of the University and the LRDP proposes no development there.
Regarding pipelines at Storke Ranch, please see response to comment I-36-15.

Response to Comment I-36-48. The EIR includes several mitigation measures related to air quality in relation to sensitive receptors, including Mitigation Measures AIR-3A and AIR-4B. With mitigation during construction, impacts were determined to be less than significant.

Response to Comment I-36-49. Please see Master Response - Phelps/Mesa Connection.

Response to Comment I-36-50. Please see Master Response - Phelps/Mesa Connection.

Response to Comment I-36-51. Comment is noted. Please see response to comments I-36-34.

Response to Comment I-36-52. Please see Impact HAZ-2 (DEIR, p. 4.6-22) for a discussion of hazards, including asbestos and other contaminants related to the demolition of buildings. The DEIR determines that such impacts would be less than significant with the application of identified mitigation and application of existing regulatory protocols for the handling of hazardous materials.

Response to Comment I-36-53. Cumulative impacts are addressed by Impact BIO-4 (EIR, p. 4.3-42). Impacts are considered less than significant with the mitigation of direct impacts and compliance with regulations for existing protected areas. The referenced map shows those areas which are within the University's jurisdiction and that are a part of the LRDP. Although surveys were performed in preparation of the EIR, site-specific surveys will be performed as individual projects are proposed.

Response to Comment I-36-54. The native grasslands and ESHA overlay are shown in Figures 4.3-1, 4.3-2, and 4.3-3. Information was derived from historical surveys and surveys undertaken specifically for the preparation of the DEIR.

Response to Comment I-36-55. Because development under the LRDP would not make a cumulatively considerable contribution to any cumulative impacts related to biological resources, the reduced enrollment alternative is not needed to reduce such impacts.

Response to Comment I-36-56. Please see response to comment A-17-BIO-9.

Response to Comment I-36-57. Under Mitigation Measure BIO-3, trees containing active nests will not be removed.

Response to Comment I-36-58. Please see responses to comments A-12-53 and I-1-3.

Response to Comment I-36-59. The DEIR considers and mitigates for both direct and indirect impacts on wetlands and other aquatic resources (p. DEIR at 4.3-30 through 38). These impacts include runoff, contaminants, and increased noise, lighting, and automotive and foot traffic. With regard to other sensitive biological resources, the commenter does not provide evidence that any of the phenomena mentioned would have a reasonably foreseeable significant impact on any sensitive species in the Project area.

Response to Comment I-36-60. Please see response to comment I-36-52.

Response to Comment I-36-61. The area directly east of Santa Catalina is biologically connected with the Storke Wetland area, and portions of that area are designated as part of the ESHA overlay (see EIR Figure 4.3-3).

Response to Comment I-36-62. Comments noted.
REGARDING THE OPENING OF PHELPHS ROAD TO THOUSANDS OF CARS A DAY.

I HAVE A CHILD AT ISLA VISTA CHILDRENS CENTER AND FRIENDS AND CLIENTS WHO HAVE THEIR HOMES IN STORKE RANCH. WE ARE CONCERNED FOR THE SAFETY AND HEALTH OF THE CHILDREN IN THE OPEN AIR PLAYGROUNDS LOCATED AT THE CHILDRENS CENTER SCHOOL, AND AT STORKE RANCH. ALSO THE PARENTS AND CHILDREN WHO WALK THIS ROAD EVERYDAY. THE EXPOSURE TO UNCHECKED TRAFFIC AND TOXIC EXHAUST FUMES WILL HAVE NEGATIVE IMPACTS FOR THE THESE PEOPLE WHO NO CHOICE IN THE MATTER. IF IT MUST HAPPEN PLEASE ADDRESS THESE CONCERNS. AS A FREQUENT USER OF THE SLOUGH ROAD LOCATED ON THE UCSB/DEVEREUX CAMPUS I HAVE NOT SEEN MUCH CONCERN, MAINTENANCE, OR SAFETY MEASURES BY THE UNIVERSITY FOR THEIR RESPONSIBILITY FOR THAT ROAD. PLEASE REMEMBER THE CHILDREN.

LORRAINE ROMERO KIM
Letter I-37
Lorraine Romero Kim

No Date

Response to Comment I-37-1. Please see Master Response - Phelps/Mesa Connection.
Dear Campus Planners:

UCSB’s Long Range Development Plan briefly mentions historic structures in its draft EIR. The Goleta Valley Historical Society, of which I am president, strongly urges in particular the preservation and restoration of the oldest of these structures, which date from the era of the Campbell Ranch (1919-1945). These include the Campbell Mansion, now known as Jacobs Hall, on the recently acquired Devereux property. The Mansion was designed in the Spanish Colonial style by noted architect James Osborne Craig who also designed El Paseo and other classic Santa Barbara landmarks. After his early death in 1923, the building of the mansion was carried out by Craig’s widow, Mary Mclaughlin Craig, and completed in 1924. Although Mrs. Craig had no formal architectural training, she ranks among the notable, and few, female architects of the era, who included Lutah Maria Riggs and Julia Morgan. Mrs. Craig designed the unique Campbell Barn at the far west end of the property (now behind Isla Vista School) which the University has unfortunately allowed to fall into neglect following the 1978 earthquake. The plans and drawings for this elegant barn are in UCSB’s Art and Architecture Archive. Also significant, and significantly neglected, is the iconic Spanish colonial style palomar or dovecote at Coal Oil Point, which dates from the Campbell era. Other artifacts of the Campbells’ presence include the nearby memorial granite cross that marked Colin Campbell’s grave and the brick portals which marked the entrance to the private family cemetery as well as the little beach house with a stone fireplace. The graceful olive trees lining Slough Road and the cypress grove at Coal Oil Point are living legacies of this illustrious period in Goleta history.

The Campbells – Colin Powys Campbell (1859-1923) and his wife Nancy Leiter Campbell (1872-1930) were important members of the Santa Barbara community during their time on the ranch. Nancy Carver Leiter was the daughter of a major Chicago figure, Levi Z. Leiter, one of the founders of Marshall Field’s department store, and she shared with her siblings in his enormous fortune, valued at $100 million in 1920. The Leiter family moved in elevated social circles of the US and Europe. Nancy’s siblings included Mary Victoria Leiter who became Lady Curzon, Vicereine of India, Marguerite (Daisy) Leiter who married the Earl of Suffolk and Berkshire, and Joseph Leiter, a famous financier and sportsman whose attempt to corner the wheat market in 1898 is legendary. Two UCSB researchers, Professor Anita Guerrini (History and Environmental Studies) and Dr. Jenifer Dugan (Marine Science Institute), have been researching the history and ecology of the Campbell Ranch for some time, and I recommend that you consult with them for more specific information.

Thank you for your consideration.

Sincerely,
Beverly Schwartzberg
Ph.D., Regents' Special Fellow, Kevin Starr Fellow in California Studies, UCSB 2001
Response to Comment I-38-1. The potential historical significance of components of the former Campbell Ranch is noted, including Jacobs Hall, the Campbell Barn behind Isla Vista Elementary School, the dovecote at Coal Oil Point, the granite cross marking the former Campbell gravesite, the brick portals marking the entrance to the family cemetery, as well as the beach house. Also, the significance of the olive trees along the northern portion of Slough Road and the cypress grove at Coal Oil Point is noted.

Please see subsection 4.4.5.1 of the EIR, where the Campbell Ranch is discussed. As noted, the Ranch was mentioned as a “place of historic interest” in the 1990 LRDP. The Ranch would continue to be of interest in this planning effort and, as explained on page 4.4-19, “if any project is anticipated to cause a substantial adverse change to any pre-campus historical resources, UC Santa Barbara will need to mitigate those impacts…” In line with this, as explained in the Mitigation Measures discussion for Impact CULT-1, a qualified archeologist will evaluate any potentially significant cultural resources for their eligibility to the California Register of Historical Resources.
Hi,

I have a question about the document "Stork Pattern Book"
Page AI says "on the west, there is the new public open space running along the Goleta Slough. It is lined with neighborhoods and links the main campus and Ocean Road (visible on the aerial sketch) to the Goleta Slough to the west. It will serve as a dramatic new address in the region and will serve as the front door to the series of new campus neighborhoods as well as the larger community"

I'm afraid I don't understand this paragraph. What new open space near the Goleta Slough is lined with neighborhoods? When is the Goleta slough to the west of the campus? It's north of the main campus, and east of the new North campus housing.

Thanks for explaining. It will help me understand the document.

Pat

--
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walker@chem.ucsb.edu
Letter I-39
Pat Walker

6/24/08

Response to Comment I-39-1. The Storke Pattern Book seeks to describe the proposed Greensward (described in detail in the LRDP) that begins at the western end of Goleta Slough and continues westward out to Devereux Slough and follows the wetlands that link the two sloughs. Currently, the Storke Family Housing and Santa Ynez apartments, as well as the Santa Catalina residence halls, adjoin this natural open space resource.
Hi -- I would be interested in understanding that ESHA determination for East Storke. Although it may not be a "wetland" now, my understanding was that it was declared ESHA because of its potential for restoration as part of the conditions of the REC Cen building. I can contact Wayne Ferren to get clarity on this, but that is what I remember. I could potentially stop by to see that ESHA determination by Morro group early next week.

Lisa

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Response to Comment I-40-1. The ESHA Overlay in Figure 4.3-3 has been amended to include the area identified as ESHA in Figure 4.8-3.
Hi Sarah:

Thanks again for talking with us yesterday and providing us some background on your modeling work. I’m sending along my comparison work of your model files and also providing some direction in terms of issues/concerns the City has so you can address them in your modeling report. Most of these were raised in our meeting yesterday but repeated here for clarification.

Attached are my spreadsheets comparing land use assumptions and trip generation results between the City’s 2005 Baseline and 2030 General Plan runs with the 2005 LRDP Baseline and forecasts. I have also included a spreadsheet which compares the City’s and the LRDP trip generation rates. Reviewing these you will see why the City and Dowling Associates has concerns. Although you stated that the UCSB related land use trip rates were adjusted to compensate for the revised land use category definitions – the LRDP 2005 baseline has close to 3,000 PM peak hour less than the City’s 2005 calibrated baseline model. This represents a significant departure from the City’s baseline – this discrepancy continues as part of the LRDP 2030 forecasts. The latter results in significantly less baseline traffic in several key City locations e.g., Storke and Los Carneros (shown as green in the volume difference plots). The LRDP forecasts also reflect significantly less UCSB related trip generation – resulting in significantly less PM peak hour traffic volumes at similar City locations (Storke, Los Carneros, Fairview) for the LRDP final mitigated forecasts (see volume difference plots). These forecast differences can be partially explained by shorter trip lengths resulting from closer UCSB O-D pairs as a result of greater on-campus housing. However, the change in average trip length by trip purpose between the City’s baseline and general plan models and the LRDP models should be documented to validate this claim. Please include average trip length by trip purpose in your report.

Also per our discussion yesterday, we cited the UCSB data presented in Section 4.10 Population and Housing of the DEIR. This section presents the following UC-Affiliated Populations information for the 2006-07 academic year at UCSB:

• 21,082 Total Students (total enrollment irrespective of full or part time status)
• 20,556 Full Time Equivalent (students enrolled for at least full three quarters)
• 9,500 Faculty and Staff (includes full and part time employees)
• 6,000 Faculty and Staff Full Time Equivalent

The source of this information is the annual Campus Profiles prepared by the Office of Institutional Research and Planning at UCSB. As stated in the DEIR and in accordance with the UC CEQA Handbook, total students (full and part time) and total employees (full and part time) are used for CEQA and the DEIR to analyze significant effects on the environment. It appears that UCSB asked you to use the 6,000 Faculty and Staff FTE which was incorrect for them to do. The effect of truncating off-campus students from the analysis and somehow reflecting them in the Student Housing land use category
needs explanation – especially in terms of its impact your trip generation results which as
stated above fall significantly shy of the City’s.

The City is concerned that the baseline validation performed for the LRDP did not go far
enough in terms of trip generation changes, volume screenline analyses etc. Any beef
you can add to your modeling report in addition to the model validation table you
provided would be appreciated. It appears from the validation table you provided that for
UCSB links the LRDP baseline model is performing quite well but for City streets the
model has problems (exceeding the maximum allowed deviation). It would be interesting
to see how sensitive the validation results are depending on jurisdiction.

Hopefully some or all of these issues/concerns can be incorporated into your technical
report. We look forward to receiving it.

Please call me if you have any questions regarding my attachments,

Jim Damkowitch

Dowling Associates, Inc. – Sacramento

(916) 266-2190 ext. 304
Response to Comment I-41-1. The comments have been noted and incorporated into the recirculated Transportation Section. Land use assumptions and trip generation results are incorporated in the analysis (RDEIR Table 4.13-36; also RDEIR, p. 4.13-62).
From: Susan and Augi Aguilera [mailto:msaguilera@cox.net]  
Sent: Monday, June 23, 2008 8:03 AM  
To: UCSB LRDP  
Subject: Petitions - Attached

Attached please find petitions that have been gathered in support of keeping Phelps Road to Mesa Road connector closed. In other words, leave it the way it is.

The signatures on these petitions came from Storke Ranch residents, residents of the Low Income Apartments on Phelps Road, from students at UCSB Family Student Housing on Mesa Road, and a handful of other people that see and understand the terrible down sides (for there are many) of UCSB's proposal to open the Phelps Road to Mesa Road connector.

If you review the attached carefully, you may find some duplicate signatures - we accounted for these duplicates when we audited the list.

All in all there are nearly 300 signatures and an overwhelming majority of the addresses at Storke Ranch are represented here.

This petition represents the voices of 300 people - including UCSB Faculty, Students, and Goleta residents. Some of these residents, those in the Low Income Apartments on Phelps Road are unable to speak for themselves to UCSB. What kind of ethics does UCSB demonstrate if it does not 'walk the talk' of listening to its own constituency? Neighbors? Aren't all these the people UCSB is chartered to serve?

More petitions can be collected. This list represents about 3 days of effort. On this small sample, the ground swell of support is evident. If necessary, or desired, a more comprehensive petition can be undertaken.

The request is simple. DO NOT OPEN the Phelps Road to Mesa Road connector. By way of this message we ask UCSB to revise the LRDP and the EIR to clearly state the Phelps Road to Mesa Road connector should remain closed in perpetuity because too many risks are entailed with opening the road. As a minimum, the EIR must be revised to adequately quantify the risks. The revised EIR must be reopened for public comment.

Safety of Children and Pedestrians – 1

A major impact the EIR failed to identify, that was raised repeatedly during the public hearing on the LRDP and EIR on June 4, 2008, and again at the Goleta City Council Meeting on June 17, 2008, is that opening Phelps road to through traffic will significantly impact the safety of children that live, go to school, and play in the immediate area. This includes children on Phelps Road as well as Children on Mesa Road. Under the County CEQA thresholds a Project has a significant impact if it “adds traffic to a roadway that
has design features...or receives use which would be incompatible with substantial increases in traffic (e.g.)

Rural roads...or residential roads with heavy pedestrian or recreational use, etc.) that will become potential safety problems with the addition of project or cumulative traffic.” CEQA Thresholds Manual, p. 171. The EIR must be revised to address the potential safety problems as a result of the project. The EIR needs to be revised and resubmitted for public comment. The LRDP needs to be revised to clearly indicate the Phelps Road to Mesa Road connector will not be opened.

Safety of Children and Pedestrians – 2

The Isla Vista Children’s Center is located immediately adjacent to the proposed road connection and there is no solid fence around its playground. At the June 4, 2008 LRDP/EIR hearing Louanne Miller, the executive director of the Isla Vista Youth Projects who operates the Center in Storke Ranch, testified that many parents walk their children to school along Phelps road. She spoke in opposition to the proposed road connection because of its health and safety impacts to the 100+ kids who use the playground right next to the connection. Also at the June 4 hearing, numerous residents of Storke Ranch reported that children frequently play in the existing cul-de-sac at the end of Phelps Road. These uses of Phelps Road will become potential safety problems with the addition of project and cumulative traffic. This is a significant impact that must be identified and mitigated in a revised EIR. See CEQA Thresholds Manual, p. 171. The LRDP needs to be revised to clearly indicate the Phelps Road to Mesa Road connector will not be opened. The EIR needs to be revised and resubmitted for public comment.

Safety of Children and Pedestrians – 3

With so many child centered activities on Phelps Road and Mesa Road, another issue for both UCSB and the City of Goleta will be significantly higher liability. Traffic counts taken by Residents of Storke Ranch at the present-day cul-de-sac where Phelps Road terminates indicates traffic volumes of 32-34 vehicles per 24 hour period. Traffic estimates provided by UCSB, based on erroneously low assumptions, indicate traffic volumes in excess of 7,000 vehicles per 24 hour period. The risk of accidents, including fatal accidents, particularly involving children, will likely increase significantly. This was omitted from the LRDP EIR.

A serious and negligent omission. Since UCSB is driving the particular change to open Phelps Road – Mesa Road connector, they would be at least 50% liable for turning an otherwise very safe area into a dangerous, accident-prone zone. The EIR needs to be revised and resubmitted for public comment. The LRDP needs to be revised to clearly indicate the Phelps Road to Mesa Road connector will not be opened.
Alternative Connector

If, and I emphasize IF, an East/West connector between Los Carneros and Storke Road is warranted, UCSB should work with the City of Goleta to find an alternative to Phelps. Storke Ranch residents are already here, UCSB’s future expansion is not. The idea that Phelps Road, nothing more than a single-lane-each-direction residential street, can be opened up to thousands of vehicles per day, is deeply problematic. Opening Phelps rd. as traffic mitigation for Hollister is a short term bandage, not a long term cure. One possible solution, a connector through an Industrial Zone would satisfy the overall desire for the City of Goleta to have another East/West cross road and avoid the dire consequences of opening Phelps Road. I strongly recommend considering Bollay Drive or other alternative routes through the Industrial Park Zone North of Phelps-Mesa. The EIR needs to be revised and resubmitted for public comment. The LRDP needs to be revised to clearly indicate the Phelps Road to Mesa Road connector will not be opened and that any mitigating action to alleviate traffic flow will NOT include opening the Phelps Road to Mesa Road connector.

Traffic control and adequate flow of traffic - 1

UCSB must complete the expansion of El Colegio rd in conjunction with Santa Barbara County BEFORE initiating any improvements on adjacent roads in Goleta. El Colegio connects University traffic to and from Storke Road. El Colegio is a key artery in the flow of traffic and it is incomplete. It needs to be completed into a double lane road both directions. Completing El Colegio is imperative to handling the increased traffic demands of tomorrow. For both UCSB and the City of Goleta. Traffic studies in the EIR did not adequately model the effects of completing El Colegio and the corollary – how leaving it ‘as is’ may impact traffic safety, particularly where it narrows. Completing El Colegio is a mitigation action from a prior EIR that UCSB has not completed. UCSB should be held accountable. The LRDP needs to be revised to clearly indicate the El Colegio will be completed between Los Carneros and Storke Road BEFORE completing additional housing identified in the project. The EIR needs to be revised and resubmitted for public comment.

Traffic control and adequate flow of traffic – 2

The EIR lacks information crucial to the analysis of impacts along Phelps and Mesa Roads. There are significant impacts associated with the proposed connection of these roads including traffic/circulation, air quality, noise and environmental justice impacts, which must be analyzed in a recirculated environmental review document. Alternatively, the proposed connection should be eliminated from the LRDP. The EIR needs to be revised and resubmitted for public comment.

Traffic control and adequate flow of traffic – 3

Individuals-Citizens
Augi
UCSB must go on record with a pledge to leave Mesa Road – Phelps Road connector “as is”, i.e., closed. The EIR needs to be revised and resubmitted for public comment for the following reasons:

a) Connecting Phelps and Mesa roads does not resolve the LRDP’s traffic impacts and instead generates its own significant impacts.

b) Storke Ranch and the UCSB family student housing complex are sensitive residential neighborhoods located on either side of the proposed connection between Phelps and Mesa roads. There is a day care center, child and adult learning center, pool, tennis courts and other recreational facilities, as well as affordable rental units in the immediate vicinity of the proposed road connection.

c) The connection will create unsafe conditions for community members who need to walk across Phelps Road to access community facilities (day care center, play areas, tennis courts, swimming pool, gym, adult learning center, orchard, and RV parking lot), to get to the bus stop (particularly kids going to school), and to walk to IV elementary school (apartment residents).

d) Connecting Phelps and Mesa roads will more than triple the volume of traffic passing through these sensitive neighborhoods.

e) The EIR lacked adequate information to assess the impact of this additional traffic on the neighborhoods along Phelps and Mesa roads.

- The EIR failed to analyze traffic impacts to the Bayberry Lane/Phelps Road intersection. This intersection is one of only two access points to the Storke Ranch neighborhood. The proposed Phelps/Mesa connection will more than triple traffic on the Phelps/Mesa road segment, so impacts to the Bayberry/Phelps intersection may be substantial and must be assessed.

- The EIR only analyzed Peak PM traffic flows through the Phelps/Storke intersection. The PM traffic flows generate significant impacts and the Peak AM traffic flows may also generate significant impacts. Data for Peak AM traffic flows must be collected and analyzed.

- The noise study did not perform modeling of noise impacts along the proposed Phelps/Mesa roadway connection. This modeling is necessary to evaluate the noise impacts associated with more than tripling of traffic along Phelps and Mesa roads.

- The EIR did not analyze the traffic increase at the connection point, in front of the affordable rental units and playground. Based on a 24 hour video traffic count by a resident, it appears that traffic in this area will increase by a factor of more than 200. Safety and environmental justice issues need to be assessed.
• The EIR must be revised to include this critical information and analysis and the revised EIR must be resubmitted for public comment.

f) Opening the connection will make it difficult for Storke Ranch residents to exit the community and cause traffic to back up into the community during busy travel times (stacking problem).

g) Connecting Phelps and Mesa roads will not solve UCSB’s traffic problems. Traffic impacts remain significant even with the proposed connections and roadway improvements in the EIR.

UCSB needs to address every concern above, a) thru g), in a separate response and revised EIR.

Traffic control and adequate flow of traffic – 4

No Evaluation of Traffic Impacts to the Bayberry Lane/Phelps Road Intersection. Although Storke Ranch is not the Project at issue, the LRDP Project and proposed mitigation will create an unsafe situation at the intersection of Bayberry and Phelps. This impact is potentially significant and must be evaluated in a revised EIR. The UCSB EIR included a traffic/circulation analysis that omitted crucial information necessary for evaluating the effect that opening Phelps Road to through traffic will have on Storke Ranch residents and their guests’ ability to safely and easily enter and exit the neighborhood. There are only two roads that lead in and out of the Storke Ranch. One of them is Bayberry Lane, which intersects Phelps. Drivers exiting the Storke Ranch neighborhood must yield to through traffic. Despite these constraints the EIR does not evaluate intersection operations or other traffic impacts at Bayberry Lane and Phelps. Discussed below, there are several potential impacts to this intersection that cannot be evaluated without this crucial information. I EXPECT EACH OF THE FOLLOWING POINTS to be addressed, as a minimum in a revised EIR that addresses each bullet point below and the revised EIR must be resubmitted for public comment. Additionally, the LRDP should be revised with clear language that indicates Mesa Road – Phelps Road connector will remain “as is”, i.e., closed, for perpetuity.

• No Data or Evaluation of Peak AM Traffic Flows through the Phelps/Storke Intersection. The EIR did not study AM Peak intersection operations at the Phelps/Storke intersection. See Table 4.13, p. 4.13-16. Similarly the EIR did not study Peak AM operations at four other Goleta intersections, and at 8 of the 9 Santa Barbara County intersections studied during the PM Peak period. Id. The EIR and traffic study do not discuss this serious omission. It is simply not possible to analyze the impacts at these intersections without this vital information.

• Unreliable Counts of Existing Traffic on Phelps. The EIR reported that 2,030 cars per day currently drive down the segment of Phelps road east of Storke. Table 4.13-1, p.
Residents of the Storke Ranch neighborhood thought this number seemed impossibly low, and one resident, Mr. John Dickson, took it upon himself to set up a video camera and film Phelps road for a 24 hour period to get a traffic count. He counted 33 cars. Refer to John Dickson testimony, June 4, 2008 LRDP/EIR hearing. The discrepancy between 33 and 2,030 cars is large enough to cast serious doubt on the accuracy of the EIR. Further, conclusions regarding traffic, noise and air quality are all compromised because this traffic count forms the baseline from which these impacts are analyzed.

- Inconsistent Traffic Estimates at Phelps and Mesa Intersections. The EIR projects a 5,600 [vehicle or ADT] increase in traffic volumes along the easternmost segment of Phelps Road and a 2,600 increase along the westernmost segment of Mesa Road, caused by the proposed roadway improvements including the Phelps/Mesa connection. Table 4.13-39. As noted by traffic engineer Tom Brohard, “[i]f the daily trips increase by 5,600 at the west end with the connection, then a similar increase can also be expected at the east end. Adding 3,000 more daily trips to the east end may result in further significant traffic impacts at Mesa Road/Los Carneros Road that must be disclosed, evaluated, analyzed, and mitigated.

- Underestimation of Future Transit Demand. As reported in newspapers around the country, demand for public transit is at historic highs due to ever increasing gas prices. With gas prices expected to continue rising, coupled with increasing awareness of global climate change, demand for public transit is likely to grow significantly by 2025. The EIR does not account for this significant change in circumstances and instead bases projections of future transit demand on obsolete statistics.

- Traffic and Circulation Impacts. The EIR identifies four significant impacts associated with increased traffic volumes on City of Goleta and Santa Barbara County roadways. Pp. 2.0-30. ‘Traffic-1’and ‘Traffic-2’ relate to intersection operations resulting in unacceptable LOS conditions under cumulative plus project conditions. Pp. 2.0-30 – 2.0-31. ‘Traffic-3’ and ‘Traffic-4’ relate to roadway operations resulting in unacceptable LOS conditions under cumulative plus project conditions. P. 2.0-32. Although the EIR proposes mitigation measures to address these impacts, all four remain significant after mitigation. Pp. 2.0-30 – 2.0-32. There are additional significant impacts that the EIR did not identify, including intersection operation and safety-related impacts at the Bayberry Lane/Phelps intersection and impacts to the safety of children using Phelps road.

- Roadway Segment Operations. Phelps Road, just east of Storke Road is a minor arterial with a daily traffic volume of 2,030 (This traffic count is very probably significantly lower, based on observations of area residents). Table 4.13-1, p. 4.13-9. Mesa Road, just west of Los Carneros is also a minor arterial with an existing daily traffic volume of 1,740. Id. The proposed connection of Phelps and Mesa roads is projected to increase traffic along the Phelps Road segment to 7,700 cars per day and to increase traffic along the Mesa Road segment to 6,500 cars per day. Table 4.13-39.
Although this increase does not exceed the LOS C threshold, additional factors including the school present on Phelps may result in unacceptable roadway segment operations.

- Intersection Operations. The signalized intersection of Phelps Road and Storke Road currently operates at a LOS A during the PM Peak period (Table 4.13-8, p. 4.13-16), and projected to 2025 this intersection will still operate at LOS A (p. 4.13-74 - the EIR fails to include and analyze traffic volumes during the AM peak hour. As discussed above, the impact analysis is incomplete without this information). The LRDP itself will reduce the operations of this intersection to LOS B. Id. With the proposed roadway improvements including the connection of Phelps and Mesa Roads, this intersection will operate at LOS D during the PM peak period. Table 4.13-33, p. 4.13-78. “The degraded LOS is due to the Phelps/Mesa connection and the additional vehicles that would travel through the Phelps Road/Storke Road intersection.” 4.13-74.

- The signalized intersection of Mesa Road and Los Carneros currently operates at a LOS B during the AM peak hour and LOS C during the PM peak hour. Table 4.13-8, p. 4.13-16. Projected to 2025, this intersection is projected to operate at LOS C and the addition of the LRDP reduces the LOS to D. Id. With the LRDP and proposed roadway improvements the LOS falls to LOS E. Id. The increase in traffic at these intersections is direct result of the proposed connection between Phelps and Mesa roads. 4.13-85. In the absence of the “mitigation measure” of opening Phelps and Mesa roads, Project impacts to these intersections and roadway segments is not significant.

- There are additional impacts directly attributable to the connection of Phelps and Mesa Roads that the EIR did not identify. For example, the EIR did not analyze operations at the Bayberry Lane and Phelps Road. Bayberry Lane is one of only two roads providing entry and egress to Storke Ranch, and exiting Storke Ranch vehicles must yield to traffic on Phelps. The substantial increase in traffic along Phelps Road may cause this intersection to operate at an unacceptable LOS, and this must be evaluated in a revised EIR.

- A further impact that the EIR did not identify is the unsafe situation at the Bayberry Lane/Phelps intersection caused by the opening of Phelps road to through traffic. Discussed above, the traffic study did not measure or evaluate operations at this intersection and the substantial increase in traffic along Phelps Road may cause this intersection to operate at an unacceptable LOS. Additionally the County’s thresholds of significance includes the following: “Project access to a major road or arterial road would require a driveway that would create an unsafe situation or a new traffic signal or major revisions to an existing traffic signal.” Santa Barbara County CEQA Thresholds and Guidelines Manual (“CEQA Thresholds Manual”), p. 171.

I EXPECT EACH OF THE FOLLOWING POINTS to be addressed, as a minimum in a revised EIR that addresses each bullet point below and the revised EIR must be
resubmitted for public comment. Additionally, the LRDP should be revised with clear language that indicates Mesa Road – Phelps Road connector will remain “as is”, i.e., closed, for perpetuity.

Environmental Impacts – 1

Air Quality Impacts. There are two preschools on Phelps road; the Steps to Learning Preschool is located at 6901 Phelps Road, near the intersection of Phelps and Storke, and the Isla Vista Children’s Center located at 6842 Phelps Road, near the proposed connection of Phelps Road and Mesa Road. There is also a pool and tennis courts on either side of Phelps Road east of Storke Road. Additionally, both on the Phelps Road and Mesa Road segments are developed with residential units. These childcare and recreational facilities, as well as residential neighborhoods are considered sensitive receptor sites under CEQA. See DEIR p. 4.2-9 and County CEQA Thresholds Manual, p. 27. The EIR demonstrates that the proposed connection between Mesa and Storke Roads will substantially increase traffic along the previously dead-end street. This substantial increase in traffic may result in unacceptable increases in both chronic and toxic exposure to air pollutants from vehicle emissions at these sensitive receptor sites. The EIR must model these emissions and perform a Health Risk Assessment. The EIR must be revised to address anticipated Air Quality Impacts with either avoidance or effective mitigation as part of the project. The EIR needs to be revised and resubmitted for public comment.

Environmental Impacts – 2

Noise Impacts. The noise impact analysis in the EIR does not disclose the full extent of noise impacts associated with the Project and proposed mitigation. “Traffic on local streets located in the project area substantially contributes to existing ambient noise conditions.”

DEIR p. 4.95. Traffic is currently the largest noise source in the LRDP project area, and is anticipated to be the largest noise source in the future.” DEIR p. 4.9-26. Notwithstanding that fact, the DEIR failed to collect sufficient data to analyze Project specific and cumulative noise impacts from Project area roadways. As discussed above, the noise study only measured traffic noise for 20 minutes at each location on one day.

DEIR p. 4.9-17. This data set is too small to verifiably represent actual noise conditions, and cannot form the basis of any legitimate conclusions regarding baseline conditions against which to quantify the Project’s noise impacts. Further, the noise study did not model anticipated future noise levels along the easternmost portion of Phelps road. DEIR p. 4.9-33. This omission is particularly problematic because of the many noise-sensitive land uses in that area. Before the EIR can reach any conclusions regarding its traffic noise impacts generally, and noise impacts associated with the proposed Phelps/Mesa connection in particular, more data must be collected and analyzed in a revised EIR.
These omissions are of sufficient magnitude to require recirculation of a revised draft to the Public. The EIR must model these emissions and perform a Health Risk Assessment. The EIR must be revised to address anticipated Noise Impacts with either avoidance or effective mitigation as part of the project. The EIR needs to be revised and resubmitted for public comment.

Environmental Impacts – 3

Significant cumulative noise impacts to the Storke Ranch and student family housing neighborhoods are likely because of their close proximity to the airport. The low-income housing complex on the North side of Phelps is within the 60 dB contour for airport noise. The expected increase in traffic noise along Phelps and Mesa roads may push ambient noise levels above the County’s 65 dB [LdN] threshold. This is a potentially significant impact which must be evaluated in a revised EIR.

The EIR must model these emissions and perform a Health Risk Assessment. The EIR must be revised to address anticipated Noise Impacts with either avoidance or effective mitigation as part of the project. The EIR needs to be revised and resubmitted for public comment.

Environmental Impacts – 4

Significant noise impacts are more likely in the Storke Ranch area because of its many sensitive noise receptors. Several distinct types of sensitive noise receptors exist on this roadway segment including a daycare center, child and adult learning center, playground, swimming pool, tennis courts as well as residences. CEQA recognizes all of these land uses as sensitive noise receptors for which lower thresholds of significance must be used. Specifically the County CEQA thresholds provide that “a significant effect may also occur when ambient noise levels affecting sensitive noise receptors increase substantially but remain less than 65 dB(A) CNEL, as determined on a case-by-case level.”

CEQA Thresholds Manual, p. 132. Therefore even if ambient noise levels near the Phelps/Mesa roadway segment are below the 65 dB threshold, significant impacts may occur because of the numerous sensitive receptors in this area. For this reason, it is imperative that the EIR be revised to model noise impacts along the Phelps/Mesa roadway segment.

Environmental Impacts – 5

Environmental Justice. The State of California defines environmental justice as "the fair treatment of people of all races, cultures and incomes with respect to the development, adoption, implementation and enforcement of environmental laws, regulations and policies."

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Government Code § 65040.12. Impacts that disproportionately affect certain cultural or economic groups must be analyzed from an environmental justice perspective in an EIR. A low cost rental-housing complex is located on the North side of Phelps road immediately adjacent to the proposed connection point with Mesa Road. Children from this complex currently utilize the cul-de-sac as a play area. Removal of the cul-de-sac and significant increases in through traffic may have unintended consequences on the residents of this housing complex.

Discussed above, the traffic increase threatens the safety of children who play near and on the road, many of whom live in the low cost complex. The complex is already disproportionately exposed to higher noise levels because it is located within the 60 dB noise contour for the airport and the proposed road connection will substantially add to the cumulative noise levels. Further, increased vehicle exhaust may threaten the health of the low income residents, many of whom are sick according to public testimony at the June 4, 2008 LRDP/EIR hearing.

These traffic, noise and air quality impacts must be evaluated from an environmental justice perspective. Because opening Phelps Road to through traffic may is proportionately affect residents of the low income housing complex, and will cause a host of other impacts described herein, we strongly urge UCSB to abandon the Phelps/Mesa roadway connection. Revise the EIR and resubmit it for public comment.

Environmental Impacts – 6

The Phelps/Mesa road connection will cause significant environmental impacts.

• It will cause two intersections and two existing roadway segments to fall below acceptable LOS conditions.

• It will significantly increase noise and air pollution levels in sensitive residential neighborhoods.

• It will disproportionately affect residents of the affordable rental units located at the proposed connection point, generating environmental justice concerns.

Revise the EIR and resubmit it for public comment.

Environmental Impacts – 7

Opening the connection will impact sensitive wetland habitats adjacent to Phelps and Mesa roads. The UCSB LRDP EIR does a woefully inadequate job of assessing impacts of wetlands that border and in fact, form a portion of the wetlands between Family Student Housing at Mesa Road and Phelps Road. The proposed LRDP would negatively
and seriously impact wetlands that provide habitat for a large number of species. UCSB, Goleta, and Storke Ranch enjoy co-habitation with this fauna and wildlife. The EIR needs to be revised to adequately address the risks, avoid effects, and identify specific budgeted actions to mitigate the risks should UCSB proceed with either Phelps Road- Mesa Road connection or re-building of the Family Student Housing at Mesa Road.

Environmental Impacts – 8

Failure to Collect Sufficient Data on Existing Noise Conditions. The noise study only measured noise levels on Project area roadways for twenty minutes at each location on one day. DEIR p. 4.9-17. Considering that traffic volumes fluctuate dramatically throughout the day, one twenty minute measurement of traffic related noise at each location is so woefully inadequate it is nearly meaningless. Inaccuracies in this baseline noise data compromise the impact analysis and the EIR’s conclusions regarding noise impacts. A new baseline that more closely models Project area roadway noise conditions must be completed. The EIR must perform a Health Risk Assessment. The EIR must be revised to incorporate this revised baseline and address impacts with either avoidance or effective mitigation as part of the project. The EIR needs to be revised and resubmitted for public comment.

Environmental Impacts – 9

Failure to Model and Evaluate Noise Impacts along the Phelps/Mesa Roadway Segment. The noise study conducted by Fehr & Peters did not perform modeling of noise impacts along the proposed Phelps to Mesa roadway connection. EIR, p. 4.9-33. This failure deprives the public of the ability understand how the LRDP and this roadway connection in particular will affect the Storke Ranch and student family housing neighborhoods. A new noise study that performs modeling of noise impacts along the proposed Phelps to Mesa roadway connection needs to be completed. The EIR must be revised to incorporate this revised, anticipated noise impacts along the proposed Phelps to Mesa roadway connection and address impacts with either avoidance or effective mitigation as part of the project. The EIR needs to be revised and resubmitted for public comment.
Information contained within the EIR clearly demonstrates the potential for significant noise impact. Specifically, the housing development located on the north side of Phelps is within the 60 Db contour for the airport. See Figures 4.9-1 and 4.9-2. This means residents of this development in particular will be impacted by the cumulative noise environment, because the other developments in this immediate area are outside this contour. The EIR must be revised to incorporate these revised, anticipated noise levels of the proposed Phelps to Mesa roadway connection and address impacts with either avoidance or effective mitigation as part of the project. The EIR needs to be revised and resubmitted for public comment.

The Proposed Connection between Phelps and Mesa Roads Causes Significant Unavoidable Environmental Impacts. The easternmost portion of Phelps Road passes through a quiet residential neighborhood, ending in a cul-de-sac. The westernmost portion of Mesa Road passes through UCSB student family housing. The proposed connection of these road segments will vastly increase traffic volumes through these neighborhoods and increase congestion at the Phelps/Storke intersection as well as at the Mesa/Los Carneros intersection. The EIR must acknowledge these significant traffic/circulation impacts. Further, the increased traffic volumes in this area may have significant air quality impacts, particularly considering that multiple sensitive receptor sites including child care and recreational facilities are located along Phelps road. On the North side of Phelps immediately West of the proposed connection point is a development comprised of 36 affordable family rental units. The development includes space for after school activities, educational and social services programs, and includes a computer learning center which tutors children and adults to become computer literate. Introducing heavy traffic in the immediate vicinity of this development raises environmental justice concerns which must be addressed during environmental review. The EIR needs to be revised and resubmitted for public comment.

Bicycle Route

The proposed Phelps/Mesa road connection would sever a heavily used East-West UCSB bicycle route, creating an unsafe area of bicycle/car interaction. This is ironic and in fact, is in direct opposition to UCSB's stated objectives for the LRDP. Severing the bicycle route actually discourages bike usage and encourages vehicle traffic. In addition it introduces another layer of safety concerns for the already heavy volume of bicycle traffic. No bicycle traffic count was documented in the EIR. Do not open Phelps-Mesa Roads. Revise the EIR and resubmit it for public comment.
Fire Access

If Phelps-Mesa Roads were to be joined into a single road, opening them will slow fire and emergency access along Phelps Road. The Phelps-Mesa Roads have a fire access which is currently uninhibited by traffic and has through capability via the automatic gate at the end of Phelps Road.

Phelps road is already a tight, single lane road, imagine 7000 vehicles traversing Phelps and a Fire Engine trying to make a rapid crossing. It will be a tragic "I told you so" when a fire emergency results in deaths at UCSB because the Fire Engine was snarled in traffic. Revise the EIR and resubmit it for public comment.

Public Transportation – 1

Increasing Goleta’s public transit network in conjunction with UCSB’s LRDP is a viable solution to UCSB’s and the City’s traffic problems.

This will generate more benefits and fewer impacts than the proposed Phelps/Mesa connection, and should be explored in a revised EIR. Revise the EIR address UCSB commitments to Public Transportation (in a comprehensive plan that includes actions, outcomes, budget, and timetable). Revised LRDP and EIR need to be resubmitted for public comment.

Public Transportation – 2

Include in the revised EIR an analysis of alternative feasible mitigation measures that could lessen environmental impacts including:

a. Substantially increasing public transit opportunities. Enhancing public transit in West Goleta is a feasible alternative that would substantially lessen the Project’s impacts. Implemented as an alternative to the proposed Phelps/Mesa connection, increasing West Goleta’s transit service would eliminate impacts to the Storke/Phelps and Mesa/Los Carneros intersections, as well as eliminate the other traffic-related impacts caused by opening Phelps and Mesa Road to through traffic. The transit alternative will also reduce overall traffic impacts and provide a tangible benefit to a community currently bearing the brunt of UCSB’s traffic impacts.

b. Prohibiting freshmen and sophomore students from bringing cars to campus.

c. Widening El Colegio to two lanes along its entire length. Currently, El Colegio Road is one of the main access routes to UCSB and there is a bottleneck where the road narrows from 2 lanes in each direction to one lane in each direction. The university is currently planning to widen the portion of El Colegio between Los Carneros and
Stadium Road as mitigation for the new UCSB graduate student housing north of El Colegio. The university should agree to fund Phase II of the widening project, west of Los Carneros, and include this in their traffic analyses in the EIR.

Revise the EIR address UCSB commitments to Public Transportation (in a comprehensive plan that includes actions, outcomes, budget, and timetable) and resubmit it for public comment.

Public Transportation – 3

The LRDP identifies “build[ing] on the existing peripheral system by...creating new roadway links...” as its “overall approach” to vehicular circulation. LRDP p. E.3. “These additional connections would allow traffic to flow more efficiently by taking pressure off primary campus and community roads and intersections.” Id. Rerouting vehicular traffic to the periphery of the Campus however does not solve UCSB’s traffic problem, and introduces additional significant environmental impacts including those discussed above. As raised by numerous public commenters at the June 4, 2008 hearing, UCSB’s articulated approach is outdated and unrepresentative of the innovative university environment.

Rather than degrade existing neighborhoods by introducing campus traffic, UCSB must develop a sustainable solution to its traffic problem. It is likely that economic and environmental concerns prominently featured daily in the news are not of a temporary nature but are here to stay. Accordingly we as a society must develop functioning alternatives to our current one-car-one-driver paradigm. One option, considered before as a solution to traffic impacts introduced by the Camino Real shopping center, is a new bus network servicing West Goleta and UCSB. A functioning bus network in this area would benefit all West Goleta residents and would avert the need for the Phelps-Mesa connection, thereby safeguarding family neighborhoods.

The Camino Real Specific Plan, adopted by the County Board of Supervisors in 1997 included a transit plan to offset the traffic volumes generated by the Camino Real Shopping Center. Caltrans failed to implement the proposed transit plan, however it remains a viable alternative to increasing and improving peripheral streets to accommodate increased auto traffic. With projected demand for public transit much higher today than in 1997 due to increasing gas prices and other factors, improving West Goleta’s transit system may now be much more effective in reducing vehicular traffic than anticipated in the Camino Real Specific Plan.

Various members of the public testified about the imperative to utilize UCSB’s greatest resource, the brainpower of its faculty and students, to create sustainable solutions for coping with UCSB’s growth. Several public commenters at the June 4, 2008 hearing noted the irony that UCSB has five Nobel laureates and yet developed a backward-thinking approach to transportation. UCSB is uniquely situated to develop a forward-thinking approach to managing growth and should take the opportunity to develop this...
now as part of a recirculated environmental impact report. Further, because enhancing West Goleta’s transit network is feasible and would substantially reduce Project impacts, the Project cannot be approved as proposed.

As demonstrated in the EIR, the proposed roadway improvements including the Storke/Mesa Road connection do not reduce the LRDP’s significant traffic impacts to insignificance. More effective mechanisms exist for addressing UCSB’s traffic impacts than merely expanding the capacity of periphery roadways, for example enhancing the public transit system servicing West Goleta to include more routes and more frequent service to UCSB. The County has already demonstrated the feasibility of similar transit improvements in the context of the Camino Real Specific Plan.

The transit alternative is a more effective and sustainable long-term solution to UCSB’s traffic impacts and must be considered in lieu of ineffective improvements which introduce unacceptable levels of traffic in residential areas.

Revise the EIR address UCSB commitments to Public Transportation (in a comprehensive plan that includes actions, outcomes, budget, and timetable) and resubmit it for public comment

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Project Alternatives – 1

Include in the revised EIR an analysis of feasible project alternatives that could substantially lessen the Project’s environmental impacts, including the possibility of developing a satellite campus in Santa Maria. Although the EIR considered relocating new development and growth off campus, it only considered lands in the immediate vicinity of the existing campus (see EIR p. 5.0-2). The Santa Maria satellite alternative would simultaneously further project objectives of the LRDP, reduce traffic and other impacts, and provide a much-needed opportunity for North County residents to attend UCSB closer to home. Revise the EIR address UCSB commitments to Public Transportation (in a comprehensive plan that includes actions, outcomes, budget, and timetable) and resubmit it for public comment

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Project Alternatives – 2

Feasible Alternatives can Substantially Lessen the Project’s Environmental Impacts. Under CEQA, a Project cannot be approved if there are feasible alternatives or mitigation measures that would substantially lessen the Project’s environmental impacts. Public Resources Code § 21002.

UCSB faces significant geographic constraints to its expansion. The increase in student and faculty populations proposed in the LRDP pushes UCSB far beyond the carrying capacity of the land, as evidenced by the significant unavoidable traffic and other impacts identified in the EIR.
There are various potentially feasible Project alternatives that the EIR failed to consider, which would help resolve this carrying capacity issue. One example, mentioned at the June 4, 2008 public hearing by Olivia Uribe, the associate director of SBCAN, is that UCSB develop a satellite campus in Santa Maria. Although the EIR considered relocating new development and growth off campus, it only considered lands in the immediate vicinity of the existing campus. The Santa Maria satellite alternative would simultaneously further project objectives of the LRDP, reduce traffic and other impacts, and provide a much-needed opportunity for North County residents to attend UCSB closer to home. Revise the EIR address UCSB commitments to Feasible Alternatives (in a comprehensive plan that includes actions, outcomes, budget, and timetable) and resubmit revised EIR for public comment.

Project Alternatives – 3

Feasible Alternatives can Substantially Lessen the Project’s Environmental Impacts. Under CEQA, a Project cannot be approved if there are feasible alternatives or mitigation measures that would substantially lessen the Project’s environmental impacts. Public Resources Code § 21002.

There are potentially feasible mitigation measures that would substantially reduce the traffic impacts of UCSB’s LRDP, which the EIR failed to consider. One mitigation measure, raised during the public hearing on June 4, 2008, is that UCSB prohibit freshman and sophomore students from bringing cars to campus. Another mitigation measure suggested by numerous commenters at the public hearing is substantially increasing public transit opportunities. Enhancing public transit in West Goleta is a feasible alternative that would substantially lessen the Project’s impacts. Implemented as an alternative to the proposed Phelps/Mesa connection, increasing West Goleta’s transit service would eliminate impacts to the Storke/Phelps and Mesa/Los Carneros intersections, as well as eliminate the other traffic-related impacts caused by opening Phelps and Mesa Road to through traffic. The transit alternative will also reduce overall traffic impacts and provide a tangible benefit to a community currently bearing the brunt of UCSB’s traffic impacts. Revise the EIR address UCSB commitments to Feasible Alternatives (in a comprehensive plan that includes actions, outcomes, budget, and timetable) and resubmit revised EIR for public comment.

Limit Growth

Feasible Alternatives can Substantially Lessen the Project’s Environmental Impacts. Under CEQA, a Project cannot be approved if there are feasible alternatives or mitigation measures that would substantially lessen the Project’s environmental impacts. Public Resources Code § 21002. The Project’s size may simply exceed the carrying capacity of the area’s present and proposed future infrastructure. Located near sensitive lands, including wetlands, the UCSB campus can only grow to a certain size. Or can only grow at a measured pace – one synchronized with infrastructure improvements such as

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widening El Colegio Road, Obtaining Water, so on. revise the EIR address UCSB commitments to Feasible Alternatives (in a comprehensive plan that includes actions, outcomes, budget, and timetable) and resubmit revised EIR for public comment.

EIR is flawed – 1

The UCSB LRDP plan was created without consideration for adjacent, planned development in Goleta, CA, within a 10 mile radius of UCSB campus. Combined impacts of 2 new hotels, Santa Barbara Airport expansion, and Bishop Ranch development need to be considered in a revised UCSB LRDP and accompanying revised EIR. It would be irresponsible of UCSB as a large and influential entity to proceed without considering these other developments. A revised EIR needs to be completed and re-issued to the public.

EIR is flawed – 2

The EIR Omits Significant Information, Avoids Essential Analysis, and Presents Inconsistent Data. “The purpose of an environmental impact report is to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment[.]” Public Resources Code § 21061. “[A] paramount consideration is the right of the public to be informed in such a way that it can intelligently weigh the environmental consequences of any contemplated action and have an appropriate voice in formulation of any decision.” Environmental Planning and Information Council v. County of El Dorado (1982) 131 Cal. App. 3d 350, 354. The LRDP EIR omits crucial information necessary to evaluate the likely effect of the proposed Project on the environment and deprives the public of their right to intelligently weigh and comment upon the environmental consequences of the Project. Many impacted residents adjacent to UCSB cannot read English. The EIR is not available to these affected individuals. UCSB has not adequately assessed, nor communicated various impacts to effected constituents in the Low Income Housing section of Storke Ranch at Phelps Road. Revise the EIR address this serious omission and resubmit revised EIR for public comment.

EIR is flawed – 3

The EIR Must Be Revised and Recirculated. A lead agency is required to recirculate an EIR when significant new information comes to light after the agency gives public notice of the draft EIR’s availability. CEQA Guidelines § 15088.5 (a). “Significant new information” requiring recirculation includes disclosures showing:

(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented
(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project proponents decline to adopt it.

(4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Where the EIR circulated for public review omits such significant new information, the public is deprived of a meaningful opportunity to comment. See Guidelines § 15088.5 (a).

There is significant new information in the form of new significant impacts from the proposed Phelps/Mesa road connection. Further a substantial increase in the severity of impacts will result without mitigation. Moreover feasible alternatives and/or mitigation measures exist that are considerably different from others analyzed. The EIR’s failure to include this information deprives the public of the opportunity to comment on a substantial adverse environmental effect of the Project and a feasible way to mitigate or avoid such an effect. As such, the EIR must be revised to include this information and analysis, and recirculated for public review and comment.

EIR is flawed – 4

Failure to Consider Pending Projects in Cumulative Impact Assessment. In the June 4, 2008 hearing on the LRDP and EIR, Ms. Mickey Flacks testified that already approved and in the pipeline projects in Goleta were not considered in the EIR. The EIR includes some pending projects in its evaluation of future traffic volumes (p. 4.13-65), however fails to consider additional pending projects including Gaviota Coast developments and Goleta’s General Plan amendments. The EIR’s failure to account for all pending projects constitutes a serious omission that undercuts the cumulative impact analysis in various areas including traffic, noise, air quality and water resources. Revise the EIR address these serious omissions and resubmit revised EIR for public comment.

EIR is flawed – 5

Many mitigation actions cited by UCSB in the LRDP EIR are meaningless, weak, or have a built-in conflict of interest. UCSB defers many mitigations to a future review by the UCSB Regents. In so far as impacts to adjacent communities, Goleta and specifically Storke Ranch, these mitigation "actions" are unilateral. They serve the interests of UCSB but not of the public that bears many of the potential impacts including: traffic, noise, water, air. The EIR must be revised to address stronger, more meaningful and inclusive mitigation actions that empower effected citizens a voice and influence.
EIR is flawed – 7 (No #6)

UCSB is planning for growth. Many students and faculty will have children. The EIR has not adequately addressed the impact on local schools and social services. The EIR must be revised to address this oversight and re-submitted to the public for review and comment.

EIR is flawed – 8

Today, with the current population of students and faculty, Storke Ranch and the City of Goleta, bear the brunt of many UCSB student and faculty-related law enforcement issues. Vandalism, speeding, drinking and driving, and even drug use and traffic to name a few. Community citizens pay tax for law enforcement services. At Storke Ranch we hire guards during Halloween. We must constantly deal with spillover effects. All of this AT THE CURRENT LEVEL OF POPULATION. The LRDP EIR is silent on anticipated impacts and mitigation for these problems that are directly attributable to UCSB Student and Faculty population. The EIR must be revised to address these serious potential impacts. A full review of the revised EIR is needed.

Trash from UCSB Growth

Have you taken a good look at the streets and apartments located in Isla Vista that abut the UCSB Campus. For the most part UCSB students live there. The streets are filthy. Littered with all sorts of rubbish, cast out furniture, empty fast food containers, and empty beer cans. The students are slobs. It's shameful. I do not want Goleta, particularly Storke Ranch and the adjacent surrounding neighborhoods to look like Isla Vista. The State of California does not allow rubbish to remain open to the weather. Reference: Regional Water Board regulations, Storm Water Pollution Prevention Plans, etc. Why? Because these items are washed into sewer systems. They drain into sensitive habitats including natural drains into Wetlands and the Pacific Ocean. These items can carry toxins. They pollute our waterways. They are harmful to wildlife and fauna. None of this was even mentioned in the EIR. UCSB needs to take responsibility and identify specific risks, mitigation actions, and follow through. Before moving ahead with the LRDP.

These significant environmental impacts were NOT addressed in the EIR. Revise and resubmit to the Public.

Drought

Drought in California, drought in California is STATE WIDE proclaimed by the Governor of California!!!!!!! (SB News Press..Thurs., June 5, 2008)
Where growth is planned, water is needed......California DOES NOT HAVE ENOUGH!!!!  (News Press..Mon., June 9,2008)

How will GWD furnish adequate waters for the residents it already serves?  GWD has major water problems. Cost will be substantial.  
(Goleta Valley Voice, June 12, 2008)

Is UCSB really comfortable causing a water shortage for current users? I hope not.

WATER       WATER       WATER       it is a huge issue

Where water would be obtained for UCSB usage was not clearly addressed in the LRDP, nor reflected in the EIR.

The LRDP and EIR must be revised to reflect the REAL issue of WATER, not the current fanciful thinking being presented.

College Costs

According to the Santa Barbara News Press, dated Sat., May 17, 2008 College fees have doubled in 6 years.

This year, starting July 1, 2008, the State of California has a short fall of $26M. The Gov. has proposed yet another fee hike for the UC System of 7.4 percent for under grads. The University goes on to state that it provides some 65% of students with some form of financial aid. WOW

If the UC budget is cut....who pays for UCSBs financial aid program.?

In addition to the rising costs, there will be an anticipated reduction in applicant acceptances. Perhaps, even in applicants!

Since California's budget is expected to rise as is the deficit for several years.....and in all probability the economy will be slow to recover......student enrollment may remain static........

Is there really a need for UCSB's LRDP to reflect so much growth at this time??????

Please revise the LRDP to reflect the current trends in the State's financial budget cuts, as they pertain to the UC System

UCSB housing growth

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1. According to an article published in the SB News Press, dated March 24, 2008, the City of Goleta has an opportunity to review UCSB’s LRDP and its EIR. In that News Press article it states that "UCSB will require 1.8 million square feet of new buildings and facilities to meet its academic needs through 2025, according to the Vision 2025 draft plan."

2. Now, according to the Pacific Coast Business Times, dated June 13-19, 2008, an article entitled "1 percent UCSB growth could increase real estate opportunities" claims that if, according to Mark Fisher, associate vice chancellor for campus design and facilities, the LRDP gets the "go ahead"..., after faculty and staff get their pick, some of the housing built by UCSB may be put up for SALE to the public" IN ADDITION, "Some of the projects laid out in the development plan WILL be turned over to a third party, meaning that although the university would continue to own the land, outside developers could build and control what goes on top of it" Fisher also said, "with the new housing, there could be new opportunities for apartment management."

Aside from the DIRECT CONTRADICTION of these statements, 1 and 2, (they are quoted verbatim) Is UCSB attempting to pull the wool over the eyes of the general public, the City of Goleta, perhaps the Coastal Commission, and I don't who else, by stating expansion into other neighborhoods as necessary for their growth? UCSB is, I believe, either misleading or misrepresenting the TRUE picture and plan of the LRDP. UCSB appears to be going into public development without going through proper channels.

The omission if this housing information in the LRDP, is irresponsible and seems contrary to the self-professed values and principles of UCSB.

Where in the LRDP does it speak to becoming a Public Housing Development Company? Where in the EIR are the risks, impacts and mitigations associated with UCSB's new enterprise?

This NEW information MUST ALL be included in a revised LRDP and EIR, AND then recirculated to the public before the proper assessment of the LRDP and EIR can be adequately made!!!!!!!!!

Is the development of public housing in the UCSB Charter??

Revise the LRDP and the EIR....Be transparent in all plans effecting the public!

County Budget Hearing

During the most recent County budget hearing as reported in the SB News Press dated June 10, 2008., as part of the inquiry regarding the high expenditures prediction, Mr. Calwell said that COLAB has asked for years how much UCSB is costing the County...The answer is $5 million ...the question then was "How do we get the $5 million
back from UCSB?" How much will the LRDP cost all of us? Me thinks too much. People are beginning to become dissatisfied with the costs related to keeping UCSB.

Susan and Augi Aguilera
Letter I-42
Susan and Augi Aguilera
6/23/08

Response to Comment I-42-1. Comment noted.

Response to Comment I-42-2. For all comments regarding the various potential impacts of opening a Phelps/Mesa connection, including subsequent comments within this letter, please see Master Response – Phelps/Mesa Connection.

Response to Comment I-42-3. Please see response to comment I-30-1.

Response to Comment I-42-4. Please see response to comment A-17-TRANS-12.

Response to Comment I-42-5. Impacts to aquatic resources are discussed in Impact BIO-1. Mitigation includes compliance with existing regulations for wetlands (Mitigation Measure BIO-1A), implementation of sediment and erosion control protocols (BIO-1B), biological monitoring throughout construction (BIO-1C), and minimization and avoidance of development with 100 feet of wetlands (BIO-1D). In addition, the following mitigations have been added:

LRDP Mitigation BIO-1E: The University shall work with the City of Santa Barbara and West Goleta Sanitary District to reintroduce tidal influx to the Storke Wetlands.

LRDP Mitigation BIO-1F: In areas which are not already developed, plans for development within 100-feet of aquatic resources, such as wetlands, shall prohibit pathways in excess of two multi-use lanes, and filling, dredging, grading, and planting of turf or non-native species, recreations fields, or automobile roads.

Response to Comment I-42-6. As noted on page 4.9-19 of the DEIR, noise measurements were used as inputs into a noise modeling program (the Federal Highway Administration’s Traffic Noise Model Version 2.5) which estimates peak hour sound levels according to average daily traffic volume of the sampled roadways. The modeling program also accounts for topographic variation and structures or barriers which can skew field measurements.

Response to Comment I-42-7. Please see response to comment A-12-48.


Response to Comment I-42-9. Please see response to comment I-26-8B.

Response to Comment I-42-10. Please see response to comment I-30-1.


Response to comment #12. A Santa Maria satellite campus would not meet the Project’s objective of strengthening the Campus form. DEIR at 5.0-1. Moreover, spreading academic programs over two campuses would impede the objective of maturing those programs. Id. Because such an alternative would not meet these objectives, no further consideration is required. Moreover, there is no evidence of the feasibility of this alternative, which would require, at the least, the acquisition or lease of land.

Regarding limitations on student cars, please see response to comment I-26-8B.

**Response to Comment I-42-14.** The DEIR considers three feasible alternatives including Reduced Enrollment, a Virtual University, and No On-Campus Housing. The Reduced Enrollment alternative is selected as the environmentally superior alternative, since it would incrementally reduce many impacts. However, as discussed on pages 5.0-27 and 28 of the DEIR, it would not meet the Project’s objectives.

**Response to Comment I-42-15.** Each of the EIR’s impact analyses considers Project’s cumulative impacts in combination with the impacts of other projects in the area.

**Response to Comment I-42-16.** The EIR was circulated, and several sections recirculated, according to the requirements of CEQA Guidelines Section 15087. The public comment period for the RDEIR began on February 9th, 2009, and lasted for 49 days.

**Response to Comment I-42-17.** Portions of the EIR (Water, Air Quality, Population and Housing, Transportation, and Wastewater) were recirculated in response to the public comment period in March, 2008.

**Response to Comment I-42-18.** The Goleta General Plan’s figures for growth have been taken into consideration where applicable, for example, in Population and Housing (see subsection 4.10.2.4). In each analysis of cumulative impacts, the EIR considers those projects which are both relevant to the impact area and that were known at the time of the Notice of Preparation.

**Response to Comment I-42-19.** Comment noted.

**Response to Comment I-42-20.** Impacts to local schools and other public services are addressed thoroughly in DEIR Section 4.11. The DEIR concludes the local school districts could accommodate the students generated by population growth under the LRDP without the construction or expansion of facilities. The LRDP’s physical environmental impact related to schools is therefore less than significant. DEIR at 4.11-20 through 22. The University, moreover, is willing to provide land for an expansion of Isla Vista School if necessary; such expansion would be subject to environmental review. Other regional growth, however, may exceed existing school capacity. The DEIR concludes that required construction would have environmental impacts that cannot now be avoided. It should be noted however, that any such construction would be subject to environmental review and mitigation.

With regard to other public services, development and population growth will not require any new or expanded facilities other than an expansion of County Fire Station 17.

**Response to Comment I-42-21.** Regarding illegal activity, please see response to comment I-16-5.

No student housing is proposed for Storke Ranch; problems that the commenter associates with student neighborhoods are unlikely to occur there.

**Response to Comment I-42-22.** lease see Master Response - Water Supply.

**Response to Comment I-42-23.** Comment noted.

**Response to Comment I-42-24.** All proposed net new enrollment and staff and faculty increases will be housed on campus with no “expansion into other neighborhoods.” The campus may engage a third party to develop or manage on-campus housing.

**Response to Comment I-42-25.** Comment noted.
From: L Gravitz [mailto:lagravitz@yahoo.com]
Sent: Wednesday, July 02, 2008 8:48 AM
To: UCSB Vision2025
Subject: Re: LRDP Update

We all just are hoping that UCSB will turn out to be a good neighbor and conscious of the living quality and financial investment of all of us in Storke ranch. Our requests are reasonable and this can be a win-win situation for UCSB and all neighbors, not just Storke ranch, when the University takes into account the needs of other community members outside UCSB. Sincerely, Leslie Gravitz
Response to Comment I-43-1. Comment noted.
PUBLIC HEARING

STATE OF CALIFORNIA

ENVIRONMENTAL IMPACT STATEMENT

UNIVERSITY OF CALIFORNIA SANTA BARBARA

VISION 2025

LONG RANGE DEVELOPMENT PLAN

AND

DRAFT ENVIRONMENTAL IMPACT REPORT

REPORTER'S TRANSCRIPT OF PROCEEDINGS

WEDNESDAY, JUNE 4, 2008

ISLA VISTA, CALIFORNIA

Reported by:

Michelle M. Sabado, CSR #7423

Certified Shorthand Reporter

SANTA BARBARA COURT REPORTING COMPANY

(805) 708-6707 File #hg060408
STATE OF CALIFORNIA

ENVIRONMENTAL IMPACT STATEMENT

UNIVERSITY OF CALIFORNIA SANTA BARBARA

VISION 2025

LONG RANGE DEVELOPMENT PLAN

AND

DRAFT ENVIRONMENTAL IMPACT REPORT

PUBLIC HEARING, TAKEN AT 960 EMBARCADERO DEL NORTE ROAD, ISLA VISTA, CALIFORNIA, COMMENCING AT 7:00 P.M. AND CONCLUDING AT 9:40 P.M., WEDNESDAY, JUNE 4, 2008, BEFORE MICHELLE MEDEL SABADO, CERTIFIED SHORTHAND REPORTER NUMBER 7423 OF THE STATE OF CALIFORNIA.
APPEARANCES:

HEARING OFFICER, TYE SIMPSON, DIRECTOR, OFFICE OF CAMPUS PLANNING AND DESIGN, UNIVERSITY OF CALIFORNIA, SANTA BARBARA

CHRIS WM. CLARK, AICP, CRAWFORD, MULTARI AND CLARK.

SHARI HAMMOND, SENIOR PLANNER, OFFICE OF CAMPUS PLANNING AND DESIGN, UNIVERSITY OF CALIFORNIA, SANTA BARBARA
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MR. SIMPSON: Good evening, ladies and gentlemen, if you could please take your seats and let us begin.

Good evening. My name is Tye Simpson and I will be the hearing officer for tonight's meeting.

This is the public hearing on Vision 2025, UC Santa Barbara's Long Range Development Plan and Draft Environmental Impact Report. On the agenda this evening is a short presentation, to be followed by the formal public hearing portion of this evening's arrangements.

Before we start reporting your comments, I need to take just a moment to go over some housekeeping items and keep things moving along in an orderly fashion. We begin this evening with a brief presentation from Chris Clark, sitting to my left, of Crawford, Multari and Clark who are the principal authors of the Draft Environmental Impact Report and have assisted the University in preparing its Long Range Development Plan.

Mr. Clark has been asked to present a very
short overview of the Long Range Development Plan and
highlight the significant conclusions of the Draft
Environmental Impact Report. Immediately following
Mr. Clark's presentation, we will begin the public
comment portion of tonight's meeting.

Mr. Clark.

(Mr. Clark made a presentation which was not
reported).

MR. SIMPSON: Thank you very much, Chris.
I will now open the public hearing. For those
who have just entered, ladies and gentlemen, this is
the public hearing on the Vision 2025 University of
California Santa Barbara Long Range Development Plan
and Draft Environmental Impact Report.
I am Tye Simpson, Director of the Office of
Campus Planning and Design for UC Santa Barbara and I
will be the hearing officer for tonight's meeting,
along with Mr. Clark who has just summarized the long
range development planning and Environmental Impact
Report. With me tonight is Ms. Sabado to my right who
is the court reporter and will be making an official
transcript this evening of your comments.
I see a number of people and I have a number
of speaker slips for folks who are wishing to speak so
I would urge you to those who have not please fill out
a speaker's form. It was available on entering the
room and if you would just raise your hand, someone
will give you a slip.
Now I will randomly select speakers from the
list and ask you and the next speaker to approach one
of the two microphones at the front of the room in
order to begin your testimony. For Ms. Sabado's
benefit, please tell us your name, spell it carefully
and any organization that you are officially
representing this evening and the mailing address of
the organization if you wish.
In order to give everyone an opportunity to
speak, I'd ask that you confine your remarks to three
minutes. After everyone has had an initial opportunity
to speak and if one comment or another has not made a
point that you wish to have made, you may return to the
microphone for an additional three minutes, but please
be sure to fill out a speaker slip so we have a record.
We have the room this evening until 10:00 p.m. so there
should be enough time for everyone to speak.
Because there is a transcript of your comments
this evening, it's not necessary for you to repeat the
same comments that others have made, so if you would
just please state the prior agreement or state the
comment that somebody before you has made and your
agreement with it, that would be sufficient.

Also, this is a public hearing on an important
matter to the University and the community and I would
appreciate it if you would refrain from shouting or
clapping and the like. It makes it very difficult for
Ms. Sabado to take an accurate record if there is too
much noise in the room.

Now I'm reminded that there are copies of
documents, reports and summaries, DVD's and CD's and
such on the table in the lobby so please avail yourself
of this material if you wish. The University staff
geographer has also mounted a number of posters and
maps in the lobby so please make her happy by taking a
good look at her fine work.

Restrooms are in the lobby to the left and to
the right. I believe there's also a drinking fountain
there.

Public notices of the comment period and
hearing dates were published in the Santa Barbara
Independent on April 24th and May 1st, the Daily Nexus
on March 31st and April 24th and the Santa Barbara News
Press on March 23d and April 24th.

There is a website with the address behind me,
www.UCSBVision2025.com where there is additional notices, information and an opportunity to request material. I understand also there is wireless service available in the theater but apparently it is not an official University service so we can make no guarantees about its speed or quality.

Public comment period is open until June 24th, as it expires on June 23d and you can mail comments to the address on the board behind me.

The purpose of tonight's hearing is to receive comments on the Long Range Development Plan and Draft Environmental Impact Report. I understand the University representatives have conducted well over 50 meetings, presentations, informed media outlets, provided direct and electronic and mailed hundreds of organizations and people and directly met with local governments and scores of neighborhood groups and organizations, but tonight is for the public to comment and the University to listen. There will be an official record of tonight's proceedings and the University will formally respond in writing to the comments in the Final Environmental Impact Report but not tonight.

So with that, I would like to encourage you to be sure to fill out a speaker slip if you haven't.
Someone will be bringing one to you and we shall begin.

The first person to speak is Larry Parsons and he will be followed by Ian Thompson. What I will do is after you begin, I will time your remarks --

MR. PARSONS: I thought this would be random.

MR. SIMPSON: -- and indicate to you by waving my hand that you have approximately 30 seconds left.

Again, if members of the public would like to speak after everybody has been given an opportunity to speak, we will go through this again until everybody has had an opportunity for a public testimony. Thank you very much.

LARRY PARSONS,

Offered verbal comment on the Vision 2025 Draft EIR as follows:

MR. PARSONS: Thank you, Tye. My name is Larry Parsons, P-A-R-S-O-N-S. I'm a home -- one of the original homeowners in Storke Ranch. I've been there for about six years now. As you can see by the map that they presented earlier, the campus pretty much surrounds Storke Ranch on three sides.

One of our major concerns is the opening of Phelps road. Right now there's an emergency access
gate and coming from an emergency management background, I understand the necessity of this in order to get emergency vehicles through to both our property and to the property behind us. This is something that I think could remain and also become an access for public transportation in the future.

In addition, I'd also like to address the architectural design. Storke Ranch is basically single family homes and condominiums. The density that we see in the plan looks pretty extensive. We would like to see some compatibility and some setback from our property in the development and obviously there's not a home so that's my major concerns.

There are other people who will be addressing other issues but I also have safety concerns because as originally developed, both sides of the road are Storke Ranch property and the people in the low income housing have total access to all of our facilities and cross the road frequently for use of the swimming pool and also access to Isla Vista School so I'll leave those as my opening comments and I'm sure other people will speak on issues.

MR. SIMPSON: Thank you very much.

The next speaker is Ian Thomson followed by Scott Haskins.
IAN THOMSON,

Offered verbal comment on the Vision 2025 Draft EIR as follows:


Three points I'd like to make. I wish it had been known as 2020, because 2020 vision is a lot better than 2025 for two main reasons. Governor Schwarzenegger today announced California was in a state of drought. This is not the first time and as global warming takes more and more control of our environment, it's not going to get any better. We are adding 5,000 people and we're going to be drinking water. That's one impact.

The second impact is Storke Ranch is a community. It doesn't matter low housing or the other, it is a community. We've got young children. One of the attractions of Storke Ranch is the dead end on Phelps. We don't have any through traffic. Opening Phelps, you're going to open up a racetrack, the same as we have at Storke Ranch and I can assure you there will be fatalities if this is allowed to go through. I beseech you to look at the plan. There are other ways
and means to get into the University if it's going to extend to the numbers you mentioned. Please do not open up Phelps road. Thank you very much.

MR. SIMPSON: Thank you. And the next speaker is David Esparza followed by Cyril Humphris.

MR. HASKINS: No, the next speaker is Scott Haskins followed by David Esparza maybe.

MR. SIMPSON: Pardon me. Thank you very much.

SCOTT HASKINS,

Offered public comment on the Vision 2025 Draft EIR as follows:

MR. HASKINS: My name is Scott Haskins H-A-S-K-I-N-S. I'm a Storke Ranch resident with my back fence on Phelps road and I would like to address specifically the opening of Phelps road.

Many of the arguments that you will hear are based upon a projection by the University that the traffic count will go to about 7500 cars per day. On the second half or the back half of Phelps, which is where the low income housing is and the day care center, there is of course a different count -- a vehicle count than the first half of the street where people are coming from Storke and then going into the
development. Our count on the second half of that street is 33 cars a day.

Going to 7500, that creates quite a few problems, including and one that we're greatly concerned about is of course the safety of all the kids whose playground is on Phelps and that safety factor is a huge I think liability on the part of the University or the City of Goleta, whoever's going to assume that liability. There's also the daycare center. There's a lot of foot traffic in that area and with my house on Phelps, we're continually batting balls and things back into the direction of the kids.

It's important that you realize that the splitting up of that community with the opening up of Phelps road is going to have significant impact on our -- on our community and I think that you'll be sensitive to the point that you've got -- that the huge liability and then of course the liability of residential property values could also be a factor that, you know, could raise its head later. Thank you.

MR. SIMPSON: Thank you.

The next speaker is David Esparza followed by Cyril Humphris.
DAVID ESPARZA,

Offered verbal comment on the Vision 2025 Draft EIR as follows:

MR. ESPARZA: Thank you. David Esparza, E-S-P-A-R-Z-A the last name and I'm also from Storke Ranch and just two doors down from Scott so the back of my home also is right there, 15 feet actually the roof line of my home from the sidewalk on Phelps road. So basically what I'd like to do is start out talking about the EIR, in particular something I read regarding the level of service and from 4.13-54 it says for the city and county roadways an impact would occur at the roadway segment that was operating below a level of service C, E based on average daily traffic volumes. Well, that being said, I decided to take it upon myself to completely read the environmental impact and it was quite the task I must say. In particular, out of the 13 intersections in Goleta studied, 11 of them exceed the significance -- which means basically the level of C or worse, so in particular the PMP level search results of Phelps road and Storke which is my main concern because I do want Phelps to maintain closure.

Basically, the intersection -- I'll read it.
Actually, this intersection continually operates at a level of service A which is Phelps road and Storke projected to operate at level service A. With the proposed LRDP development the intersection would operate at a level of service B, but with the proposed LRDP road improvements and the potential at the Isla Vista UC Santa Barbara road connections, this intersection would operate at a level of service D. Well, that's not permissible according to Goleta city who I just met with.

Okay. So basically in your report right here the degraded level of service is due to the Phelps Mesa connection and the additional vehicles that will travel through the Phelps Road/Storke Road intersection. So that's specific. So I decided to conversely look at the other side of the coin. Mesa Road at Los Carneros, this intersection currently operates at level C and it's projected to operate at level of service E under 2025 conditions. With the proposed LRDP intersection then it would operate at level service E, but with the proposed LRDP improvements and the potential UC Santa Barbara, this intersection would operate at a level of service F.

When I went to school and I got an F, what would that mean? I flunked. So you know as well as I
do that that does not work. So by your own study
you're going to have to do something about that.
Opening up the road actually makes it worse.
Interesting, huh? It even said in here the degraded
level of service is due to the Phelps Mesa connection
and the additional vehicles that would travel through
the Mesa Road and Los Carneros Road intersection. So
easily solved, just don't open the Phelps as it
connects to Mesa, right? Thank you.

MR. SIMPSON: Thank you very much.

Mr. Humphris, followed by Debbie Bultan.

Cyril Humphris spelled Humphris
from Storke Ranch. I want to draw your attention to
the 14,000 car parking spaces that are projected in the
plan. Currently that's an increase of 3,000 car
parking spaces. You didn't give us the area of the
campus that those spaces cover. You gave the areas for
the other buildings, et cetera but not the car parking
spaces. One of the problems I find with the plan is
that it's driven by those -- need to provide those car
parking spaces and I want the UCSB to consider some kind of integrated transport system within the campus linking up with Goleta City Council transport system that will get people about the campus, perhaps an automatic train service, electric train service, eventually driven by solar energy.

You've got five Nobel prize winners on the campus, two of them are very enthusiastic about the future of solar energy. It could very well be driven at least in part by solar energy in five years time when solar energy is projected to be at a cost on par with fossil fuels. But you maintain, you insist on increasing the number of car parking spaces on campus instead of going for some kind of plan which will reduce your need to build out from the campus.

So I plead with you to look again at that projection of 14,000 car parking spaces. With oil set to demand already exceeding supply and all the oil companies looking at ways to invest in alternative energy, why is UCSB carrying on in the other direction and increasing the number of car parking spaces? Thank you very much.

MR. SIMPSON: Thank you.

Debbie Bultan followed by Nicole Cerra.
DEBBIE COX BULTAN,

Offered public comment on the the Vision 2025 Draft EIR as follows:

MS. BULTAN: Thank you. My name's Debbie Cox Bultan, B-U-L-T-A-N. I'm the executive director of the Coastal Housing Commission, which is a local nonprofit here in town dedicated to creating and supporting solutions to our housing crisis and the impact that that housing crisis adds environmentally and socially to our community.

I'm here to convey CHD's support of the University's long range development plan, in particular the University's commitment to provide work force housing on campus for its faculty and staff in close proximity to the jobs. The new units are a significant increase on what's on the ground now and what's currently in the works and the plan to house the projected net increase of students will free up housing in the surrounding areas for other nonUCSB employees.

We're pleased that the proposed units include a variety of housing types that will be affordable for workers of all different levels and that you plan to insure that housing is available in a timely manner as each increment of the growth happens, as well as the
fact that there'll be resale restrictions to insure
permanent affordability.
We're also pleased to see your emphasis onsustainability being integrated into this development.
We don't support all development but we're looking for
developments that are compact, pedestrian and transit
oriented and within the existing urban boundaries so we commend you for that and finally, we support your
efforts to provide work force housing. We encourage you to do all that you can in that arena, including
looking where appropriate to higher densities and
heights for some of the residential projects as well as
providing programs for employees looking to become homeowners. So thank you and we'll be submitting a
letter before June 21st.
MR. SIMPSON: Thank you very much.
Nicole Cerra followed by Andrew Hankin.

NICOLE CERRA,
Offered public comment on the Vision 2025 Draft EIR as follows:

MS. CERRA: It's Nicole N-I-C-O-L-E, C-E-R-R-A, and I'm a board member of Shorelands and Wwatersheds, a local nonprofit organization and we
assist in protection of the natural and cultural resources of Devereaux watershed which is the watershed just to the west of here.

I'm going to talk just a little bit about the monitoring and management of wetlands at UCSB. There is a piece of the ESH in the LRDP that states that the campus will implement the wetlands plan for Storke wetlands in the Devereaux slough. Likewise, the campus management and wetlands plan states that -- this is the plan from 1991 -- that states that in order to insure proper management of the campus wetlands, UCSB should provide adequate funds to conduct routine collection and analysis of data on the surface and groundwater levels, et cetera, et cetera. It goes on to describe a number of indicators. And on behalf of Shorelines and Watersheds, I'm here to urge UCSB to fulfill its obligations to its wetlands by supporting the Devereaux slough monitoring program and the Devereaux slough is located within Coal Oil Point Reserve, one of the 36 preserves in the University of California natural wetland system. The monitoring program started in 2002 and the DSNP is an intensive long term ecosystem study of the Devereaux slough.

This is different than a sporadic monitoring which you can't really conclude much of from sporadic
monitoring. A long term monitoring program is necessary to understand the ecosystem in depth, the Devereaux slough, how nearby developments including the developments in the LRDP will affect the Devereaux slough and how to implement a comprehensive management plan.

So I'm here to urge UCSB to financially support a coordinated monitoring program and supplies for the Devereaux slough monitoring program and you might also consider employing a long term monitor who can monitor the Devereaux slough and all of the other wetlands within UCSB including UCSB campus lagoon, so that's my comment. Thank you very much.

MR. SIMPSON: Thank you. Next speaker is Andrew Hankin followed by Ana Citrin.

ANDREW HANKIN,

Offered public comment on the Vision 2025 Draft EIR as follows:

MR. HANKIN: Hi, I'm Andrew Hankin, spelled H-A-N-K-I-N. I'm here to informally represent bicyclists, pedestrians and bus riders around the campus area. I read of an outrageous proposal to close
the Pardall tunnel between Isla Vista and the University campus. This must absolutely not happen because of the thousands of pedestrians and bicyclists that go every day each direction using that tunnel. If anything, there should be additional tunnels under Stadium Road and also El Colegio Road to accommodate pedestrians and bicyclists and keep them completely physically separated from vehicle traffic, otherwise I guarantee there will be fatalities between motor vehicles, pedestrians and bicyclists.

Secondly, UCSB needs to consider helping the MTD bus service provide better connections to the local surrounding areas where many students, graduate students and faculty live. I had friends who lived on University drive and there was no viable bus service between University drive and the University campus. The irony was not lost on me.

And finally, there was a mention of glare from lighting on the additionally expanded campus. Most of the street lights around the University campus are these strange high intensity globes that immediately spray more than half of their output straight up into the sky, a complete waste and a distraction from astronomers. The campus needs to look at higher efficiency lighting that directs light down to where
it's actually needed and those are my three points.

Thank you.

MR. SIMPSON: Thank you very much. Ana Citrin followed by Kelly Hildner.

ANA CITRIN,

Offered public comment on the Vision 2025 Draft EIR as follows:

MS. CITRIN: Good evening. My name is Ana Citrin, A-N-A, C-I-T-R-I N. I'm an attorney with the law office of Mark Chytilo representing the Storke Ranch Homeowners Association.

I'll be commenting specifically on the EIR.

CEQA requires that the EIR analyze the whole of the project, including any impacts caused by proposed mitigation measures. Here UCSB has proposed various roadway improvements to alleviate the traffic impacts caused by the significant proposed increases in the UCSB student and faculty populations. The proposed connection of Phelps and Mesa Road is of particular concern because there are residential neighborhoods on both sides of the proposed connection that will be significantly impacted. The proposed connection will more than triple traffic volumes in these...
neighborhoods, exceeding the capacity of existing streets and intersections as discussed previously.

This traffic increase will also cause proportional increases in noise and air pollution.

Unfortunately, the EIR fails to provide sufficient information to analyze the full extent of impacts associated with the Phelps Mesa connection.

Specifically, there are material omissions in the traffic and noise studies which made the impact analysis in those areas incomplete. The EIR cannot consider the effect of the project upon Storke Ranch's residents' and guests' ability to safely and easily enter and exit the neighborhood. To mitigate those impacts, the EIR did identify a series of roadway and intersection expansions that are proposed but the impacts of these proposed improvements are not adequately analyzed in the EIR.

As I noted, CEQA requires these impacts be considered in the EIR just like any direct project impact. These omissions deprive the public of its way to intelligently weigh and comment on the environmental consequences of the project and CEQA requires the EIR be revised and recirculated to include the significant information.

The EIR is also deficient because it failed to
consider whether the project and its mitigation would cause disproportional impact upon communities, otherwise known as environmental justice impacts. A low cost rental housing complex is located immediately adjacent to the proposed connection of Phelps and Mesa roads. Residents of this complex are already exposed disproportionately to high levels of air and noise pollution from the airport. The cumulative effect of introducing new significant sources of noise, air pollution as well as traffic to this community must be evaluated from an environmental justice perspective. Finally, under CEQA, a project cannot be approved if there are feasible alternatives or mitigation measures that would substantially lessen the project's impacts. The proposed roadway improvements including the Phelps Mesa connection are ineffective in reducing the project's traffic related impacts and as discussed, they create their own significant impacts. Enhancing the public transit network in Goleta, however, is a feasible mitigation measure that would reduce UCSB's traffic impacts and could avoid the significant impacts by diverting the impacts through residential neighborhoods. Improving public transit will also benefit the community and it's a sustainable and future oriented solution. This transit alternative
must be evaluated. Thank you.

MR. SIMPSON: Thank you very much.

Kelly Hildner followed by Mike Scott.

KELLY HILDNER,

Offered public comment on the Vision 2025 Draft EIR as follows:

MS. HILDNER: Kelly Hildner, that's Kelly with a "Y" and H-I-L-D-N-E-R. I would like to support absolutely everything that Ana just said so I won't reiterate that.

I'm a Storke Ranch resident and I would like to say that we're very concerned there about the impacts of the UCSB LRDP to Goleta and to our neighborhood including increasing traffic congestion, air pollution, noise, light pollution and cumulative impacts to sensitive wetlands, views and recreational facilities and how all these additional people that the University is proposing will impact water supplies especially during drought years.

I'd like to request that the University cap enrollment at current levels or no more than 1,000 additional students because I feel there's a capacity to this area and adding 6,746 additional people would...
cause unmitigable impacts to the community and the
sensitive habitat areas in Goleta.

I request that the plan certainly allow no
more people than can be served by the existing water
supply during a typical drought year.

At Storke Ranch we're very concerned about the
direct impacts of the development on our community.

We're concerned about the plans to tear down and
rebuild the family student housing next to us to the
east and increasing the density to more than five times
the density of Storke Ranch and making most of the
building space four to five stories and we're concerned
about the plans to build three more buildings on the
Francisco Torres site and building housing on and
around the wetlands on the driving range directly
across from Storke Ranch which is actually not part of
the plan but already approved.

We would like the University to limit the
density and height to new buildings in these areas to
height and density to Storke Ranch in order to go with
the character of the community and to limit noise,
traffic congestion, organization at facilities and
sensitive wetlands, including the Devereaux wetlands,
the wetlands adjacent to Francisco Torres, the wetlands
just north of the Phelps Road and the wetlands on the
Camino Corto open space.

We also would like the University to create minimum, very minimum hundred foot vegetative buffer areas between your proposed development areas and Storke Ranch and between proposed development and existing wetland habitats.

Also, as far as mitigation for the traffic, Ana mentioned the transportation system. We'd also like you to consider limiting -- prohibiting freshmen and sophomores from bringing cars to campus and improving the pedestrian and bicycle routes like was mentioned by one of the previous speakers including along El Colegio and Storke Road and also consider widening -- continuing finishing the widening of El Colegio Road for better traffic. Thanks.

MR. SIMPSON: Thank you very much. Mike Scott followed by Luann Miller.

MIKE SCOTT,

Offered public comment on the Vision 2025 Draft EIR as follows:

MR. SCOTT: My name is Mike Scott, S-C-O-T-T. I'm also a Storke Ranch resident. Much of what I have to say has already been covered by other Storke Ranch
people.

However, I think that rather than planning for all of these new parking structures and especially right next to my place, I think if you instead were to move the freshman and the sophomores onto the campus and through public transportation systems reduce the amount of traffic, you wouldn't need to put in all the parking structures. You would have a much better method of mitigating the impact of your students in the area. Thank you.

MR. SIMPSON: Thank you. Luann Miller followed by Florence Klein.

LUANN MILLER:

Offered public comment on the Vision 2025 Draft EIR as follows:

MS. MILLER: My name is Luann Miller, L-U-A-N-N, Miller, M-I-L-L-E-R. I'm the executive director of Isla Vista Youth Projects. We're a community based program that's provided services to youth and families in Isla Vista since 1971. We do operate the children's center that's on Phelps Road -- on Phelps Road in the Storke Ranch apartments and I have three comments.
First, I want to acknowledge the partnership that we have had with the University for the entire time that the Youth Projects has been in existence. We provide professional, volunteer and employment for students. University faculty and staff serve on our board of directors, help in many of our projects and I want to acknowledge that partnership. But I feel I would be remiss if I didn't bring up the second two points.

I won't profess to having read the whole LRDP, but in your comments I didn't see in your alphabetical listing the impact the additional residents and employees might have on schools and I'm talking about infant up through age 12 and that may be a part of the plan that I haven't read but I do ask you to consider the impacts that students and increased employees will have on the existing school structure.

My third point is as the director of the children's center which is right next door to the low income housing development, our playground as well as the playground for the low income housing projects is right next to Phelps Road. There's literally a sidewalk separating it.

We serve 100 children there, low income families, some of the most vulnerable, infants on
beginning at three months so I ask you to consider the impact that opening Phelps Road would have on the children and the families. Not only their health but also the safety of the families who primarily access our center on foot walking from Isla Vista, crossing the intersection going down El Colegio crossing Phelps to get into the Storke Ranch homes, clutching a child, a toddler by one hand, pushing a stroller in the other, trying to negotiate street lights, I ask to you consider that.

Increased traffic going by the center, there's no barrier, there's no wall on that entire side of Phelps Road as there is on the opposite side of the street. There is not even a fence on the playground of the low income housing so ways to mitigate both visually the increased visibility that cars will have into the center, music blaring, particulate matter coming off the tires, the emissions from the exhaust if they're waiting to exit so those are all some things I'd like you to consider. Thank you.

MR. SIMPSON: Thank you. Florence Klein followed by Suzie Null.

FLORENCE KLEIN,
Offered public comment on the Vision 2025
Draft EIR as follows:

MS. KLEIN: Hello. My name is Florence Klein. That's K-L-E-I-N and I am a homeowner in Isla Vista. I live right up against the housing that is for University professors there and even at the -- what is considered by the police as the quietest, safest area in Isla Vista, we have had tremendous problems at different times with the student population. To -- my concern is when I see this growth impact that the University wants to do, it doesn't seem to take into -- it doesn't seem to take in the thousands of additional housing that is planning to be put in Isla Vista as well on top of what the University is putting in. We're getting thousands of more additional housing that has been approved for the state mandated housing and that they decided to put in Isla Vista because nobody else on the south coast wanted it. Also, Cabrillo Business Park which is going to be on Hollister and Los Carneros is going to create an additional thousands of more people coming in there and both of those EIR's separately -- the I.V.'s master plan and the Cabrillo Business Park -- have said that the Los Carneros -- the Los Carneros El Colegio traffic and Hollister is going to be class one unmitigable
impact in the traffic. They said unmitigable and
that's not even considering what you guys are doing.
Each one of them separately said that their separate
flow was going to create unmitigable impact and an
additional concern that comes with that is that in each
one of these visions with -- everybody has their own
separate interests, whether it's money, expansion,
whatever it is, nobody has taken into consideration an
evacuation plan for the residents of Isla Vista.
I live in Isla Vista. I have a child that I
have to get to junior high school every day. I'm
wondering with all of this buildout how I'll get her to
school on time. But if there's an emergency being not
an everyday situation but if there's really an
emergency which could happen -- it could be a tsunami,
it could be an earthquake. These are not like Star
Wars visions, these could really well happen. It could
be another fire. We have two ways of getting out of
Isla Vista, Los Carneros and Storke and just on Camino
Corto just getting out of Camino Corto any number of
times I've been almost run over by some wild UCSB
student in the middle of the day, you know, already a
little high flying as if he's in L.A. and you know when
I go, "Wow, you almost killed me," I won't even repeat
what I get back and when you're going to impact Isla
Vista with even more people and more cars and more traffic and no evacuation plan, you go, "Well, UCSB we have a great earthquake evacuation plan but our community does not and nobody seems to have addressed that."

We don't have a city. We're kind of sold out by our supervisors and I'm asking somewhere if something happened where will the buck stop? Who will be answerable to that community?

MR. SIMPSON: Thank you very much. Suzie Null followed by Dick Flacks, Bob Potter, Olivia Uribe and Mickey Flacks as a single group.

SUZIE NULL,

Offered public comment on the Vision 2025 Draft EIR as follows:

MS. NULL: Hi, I'm Suzie Null, S-U-Z-I-E, N-U-L-L, and I came to just address the concerns about the walkways and sidewalks that we have on campus now and how that could be impacted by an additional 5,000 students.

My experience as a graduate student on campus and as a small woman has been that the sidewalks are not safe in their current condition. Most of the time
when I leave my building that I work in I have a near collision with either a skateboarder or with a cyclist who's riding illegally on the sidewalk.

I've talked with the chief of police and she says that there isn't appropriate signage in Phelps for them to even do enforcement so buildings like that are completely unenforced. There's usually about two police officers to police the entire campus as I'm sure you guys know, so my question is mainly what measures are going to happen to insure pedestrian safety on campus? Will there be any dedicated walkways for pedestrians only so that they can make it to their classes without having to worry about collisions from people who are skateboarding or who are cycling illegally and will there be -- I think these are necessary for people who like me are just small and are not yielded to by larger people on skateboards, not to mention by disabled people or by people with young children or by the elderly. We need to remember that the campus needs to be accessible to all people and not just people who are between 18 and 23.

I also wonder if there will be provisions made for students who want to skateboard to class so that they don't have to damage pedestrians. It's an unsafe situation all around right now and that is a very
important part of alternative transportation on this
campus and I'm very disappointed that it hasn't been
addressed at all in the long range development plan,
despite the fact that people like me have been writing
letters to the campus for two and a half years. Thank
you.

MR. SIMPSON: Thank you very much. And a
joint three minute presentation by --

MR. FLACKS: Twelve minutes, sir. Four people
three minutes each. Yes? Okay.

DICK FLACKS,

Offered public comment on the Vision 2025
Draft EIR as follows:

MR. FLACKS: I'm Dick Flacks, F-L-A-C-K-S.
The four of us will be representing the so-called HOT
committee of Santa Barbara County Action Network. HOT
stands for housing, open space and transportation. We
are monitoring a number of projects in the community.
We do want to see affordable housing developed but we
also want to see that done in ways that maintain the
environment values and that are tied to transportation
improvements. We have a number of points to make. One
is -- starts with questioning the fundamental plan
itself for increasing enrollment by 5,000. The question is, is this adequately justified? I don't know if that's a question for the EIR but it seems to me it is a question for the University itself. There isn't a detailed account of what the expected UCSB enrollment is going to be and how UCSB is helping to meet this supposedly increased demand. You all assume there'll be increased demand but what is it and what is UCSB's role in that, so the foundation for a 5,000 student enrollment with respect to the social need, the state need for more spaces for students doesn't appear to be provided. A good part of that 5,000 has to do with increased graduate enrollments. That doesn't help the undergraduate demand. It does help if it could be done with the graduate programs at the University. Many of UC campuses have a similar goal, increasing their graduate enrollment during the same period. We need to know -- I think the public needs to know what justifies all of that increased graduate education and is it actually going to happen? That is, is the demand going to be there that is stated to be necessary. The plan speaks to about important goal to be promoting the maturation of UCSB programs. I think as a long time faculty member of the University, I
I understand sort of what that means but I don't think it's explained or illustrated in the document at all.

What does it mean to make sure these programs?

The one concrete aspect of the plan that is very important for program development is that 250 new faculty positions will be added to the existing campus faculty body but what isn't really highlighted is that 550 faculty will be retiring in the same timeframe according to the University. Why isn't the retirement of 550 faculty in this time period an adequate basis for re-allocating resources and making program development?

There's an alternative provided in the EIR which is a 3,000 student increase. That is strangely enough not developed adequately as an alternative which is important, given -- and I'll be brief about this -- that the 5,000 enrollment increase exceeds the water potentials of Goleta, creates unavoidable increases in jobs, housing imbalance, creates unavoidable traffic impacts.

Why isn't the small enrollment increase which is more consonant with those kinds of concerns given more adequate attention as a real viable alternative?

We're very concerned about these imbalances and one of the I think problems in the EIR is its effort to
estimate community to the campuses. It speaks of those coming to the campus from within Santa Barbara County as not commuting, not counted as commuters, whereas the commuting calculations are based on people commuting from Ventura and other counties. Most of our commuting is within the county and that is not estimated.

MR. SIMPSON: Doctor Flacks.

MR. FLACKS: You want me to stop. Let me just say that -- and we would like to see the smaller alternative with the same housing development that you are now planning. We like the housing development as far as we can tell. We think that would really help the community if that smaller enrollment target was coupled with really expanding the housing supply.

MR. SIMPSON: Thank you very much. Bob Potter.

ROBERT POTTER,

Offered public comment on the Vision 2025 Draft EIR as follows:

MR. POTTER: Robert Potter, PO-T-T-E-R. I'm a board member of SB CAN, the organization that Dick was representing.

MR. SIMPSON: Pardon me for a moment.
MR. POTTER: Yes.

MR. SIMPSON: You will be followed by Olivia Uribe.

MR. POTTER: My comments have to do with the interactions of housing and enrollment. As indicated in the impact study PO, P-2, quote, housing opportunities may not keep pace with increases in either enrollment and/or new employees anticipated, close quote. In other words, if increases in enrollment proceed as planned there may not be adequate housing available for these new students and even more pressingly the new employees who will be needed to staff the expanded campus population. The draft EIR proposes a series of actions to mitigate these possible consequences. Unfortunately, these proposed actions are seriously inadequate in our opinion in the following respect.

One, the housing development goal is to provide housing for quote, each added increment of new enrollment within a four year period. But this leaves a four year gap potentially between the arrival of the new enrollees and the provision of adequate housing for them.

Two, the implementing language for the fulfilling of this goal, quote, "the University shall
work towards achieving," emphasis added, is manifestly weak. The expression is a wish rather than a requirement.

Three, progress toward achieving this goal -- emphasis added -- is to be monitored by a detailed annual report. So far so good. But the enforcement of the mechanism in case insufficient progress is identified is itself insufficient. It calls only for reviewing of the, quote, "area housing supply for students and families," unquote, to see if there is a shortfall and if so, more planning. Quote, "accelerate planning for on-campus housing," unquote, and evaluate the need for housing with the private sector, quote, "cooperate with real estate interests."

MR. SIMPSON: Mr. Potter.

MR. POTTER: Yes, I'll be right to the point. These actions are an expression of hopes and wishes rather than solutions, so specifically we recommend a policy of first things first. Increased enrollment increments should be timed to occur only after rather than before requisite housing is provided. Thank you.

MR. SIMPSON: Thank you very much. Olivia Uribe followed by Mickey Flacks.
OLIVIA URIBE,

Offered public comment on the Vision 2025 Draft EIR as follows:

MS. URIBE: Good evening. My name is Olivia Uribe, U-R-I-B-E, and I'm the associate director of SB CAN.

Looking at the EIR references that have been raised regarding housing and the timeliness, the available water supply and the effects of the proposed growth on transportation, Santa Barbara County Action Network would like to propose that the EIR in its efforts to discuss mitigation be creative and careful to address all the points of concern and SB county encourages exploring innovative ideas such as an extension or satellite campus perhaps in Santa Maria where there is a higher availability of housing and lack of jobs and higher educational facilities. A satellite University campus would diminish the issues of traffic as well as housing unavailability by keeping students and some staff and faculty within a close distance of their living and recreational areas.

Another idea would be to purchase a retirement home or build one for retired faculty. Often as families grow older, retired persons sell homes and
live in retirement homes that provide access to services and keeps living necessities and recreational activities within close proximity.

In order to mitigate housing, water supply and transportation concerns SB CAN proposes as an alternative a shift in either the number or the timeline from the current proposal by one or more of the following -- kind of relating to what Bob was speaking about -- keeping the enrollment cap as it is while continuing to build the housing to accommodate the students and faculty already struggling to have affordable housing or allowing an increase in graduate students without necessarily increasing the number of undergraduate students or enforcement of concurrent planning and building rates to growth rates, so that the students amount grows as the housing is available.

These are all of the suggestions. Thank you.

MR. SIMPSON: Thank you. Mickey Flacks followed by Tom Blabey.

We're approaching the midpoint of the time for this evening's hearing and so what I'd like to do is take a five minute break to give the court reporter an opportunity to rest her fingers and then we will immediately resume.
MICKEY FLACKS,

Offered public comment on the Vision 2025 Draft EIR as follows:

MS. FLACKS: I'm Mickey Flacks, Mickey like mouse, F-L-A-C-K-S.

I'm speaking primarily of the transportation aspects of the draft EIR, the impacts on our area traffic are both significant and unavoidable. The draft does not even consider the cumulative impacts already approved during the pipeline projects in the Goleta area, possibly thousands of new housing units plus new commercial development. The draft does not seem to consider the increase in trips generated by students and spouses working off campus, children going to junior and senior high schools off campus and outside of I.V. and other trips for services not available on campus or I.V. such as doctors, shopping, entertainment, et cetera. The planned mitigations are vague and seemingly not enforceable.

Will there, in fact, be free UCSB paid bus service for all faculty and staff as well as students? What are the specific plans for creating this? What rewards are planned and has there been any testing of the efficacy of these rewards? How is progress towards
these mitigations to be measured? Planned and recent
increases in campus parking capacity seems to encourage
private car use. Might not UCSB housing units provide
car access but offer parking only on remote sites in
order to discourage daily car use?

Commuting by workers into the south coast from
north and south results in the daily addition of
eight tons of CO2 to the local airshed every day
according to figures provided by the APCD. UCSB is the
area's largest employer. A major reduction in the
University's carbon footprint could be achieved by a
serious concerted genuine effort to reduce car use by
all University folks. Plans to maintain or improve Los
Carneros by increasing roadway capacity are not the
direction we should be going in. Vague promises about
working with cities, county, SB CAN and MTD and other
transit providers have been made before and often do
not seem to result in genuine measurable trip
reduction.

UCSB's ability to expand must be linked to its
ability to change the car climate before it irrevocably
changes ours. Ultimately, we must evaluate the trade
offs that are needed. What is the purpose of the
expansion? Do the impacts on the larger community
justify them? If significant impacts are unmitigable,
where is the justification for them? Are we educating California's youth or providing FTE's for departments and gross numbers to compete with other UC campuses?

If UCSB research for example --

MR. SIMPSON: Miss Flacks.

MS. FLACKS: Yes, one more sentence.

-- produces noxious emissions but ultimately cures cancer, the community might well be willing to tolerate, but if the research is only to boost drug company profits or professors' CVs, must the community pay the cost? The community must be fully aware of all that is being asked of it by the University in order to decide how and if to live in it.

MR. SIMPSON: Thank you very much. And the last speaker before the break will be Tom Blabey.

TOM BLABEY,

Offered public comment on the Vision 2025 Draft EIR as follows:

MR. BLABEY: My name is Tom Blabey, B-L-A-B-E-Y. I'm here tonight on behalf of the Goleta Valley Chamber of Commerce. We represent over 500 businesses and 25,000 jobs in the Goleta valley and surrounding region. UCSB has been a key driver in the
local economy since the University's inception decades ago. The university provides valuable employment that generates revenue for the City of Goleta and other local municipalities. UCSB also provides an important labor force for a range of jobs in the Goleta area, everything from student health service jobs to professional level employment in software development, banking, engineering and other important industries that help strengthen the region's economic health.

The well-managed growth of UCSB will continue to provide vital economic benefits to the community. The long range development plan allows for a number of plans that will generate increased employment opportunities in the community, a higher proportion of graduate students, new oncampus housing, integrated neighborhoods with new services and incorporation of sustainable practices in all building and operations. The LRDP is especially attractive in its plan to provide new work force and student housing to accommodate the University's changing population. The Goleta Valley Chamber of Commerce does look forward to a continuing positive relationship with the UCSB.

Thank you.

MR. SIMPSON: Thank you. We will now adjourn the public hearing for five minutes. I do note that I
have approximately 30 additional speaker slips and we
will let folks know how long the hearing will continue
and we will readjourn in approximately five minutes.
Thank you very much.

(A recess was taken.)

MR. SIMPSON: I will now reopen the public
hearing on the University of California Santa Barbara's
Long Range Development Plan and Draft Environmental
Impact Report. A reminder if there are additional
people who wish to speak to please raise your hands so
we can get a speaker slip to you. I saw a hand in the
back perhaps.

MS. HILDNER: What if we want to speak again
if there's time? Do we need a another speaker slip?

MR. SIMPSON: Speaker slips are required for
all speakers. So please raise your hand and we will
get a speaker slip to you.

I will now call Giulia and Malia Brofferio
followed by John Dickson.

GIULIA BROFFERIO,
Offered public comment on the Vision 2025
Draft EIR as follows:
MR. BROFFERIO: First name G-I-U-L-I-A, last name Brofferio, B-R-O-F-F-E-R-I-O. First name Malia, M-A-L-I-A, same last name. We're here -- I'm here as a parent of a child that currently attends the Isla Vista Children's Center and as a board president at the Isla Vista Youth Projects just to reiterate that Luann Miller our Executive Director already said and further reiterate the great relationship we've had with UCSB as an organization and I personally do not have problems with the LRDP and environmental impact report with the exception of the expansion of the Phelps Road to the Mesa Road. Thank you.

MR. SIMPSON: Thank you very much. John Dickson followed by Augi Aguilera.

JOHN DICKSON,
Offered public comment on the Vision 2025 Draft EIR as follows:

MR. DICKSON: Hi, My name is John Dickson, J-O-H-N, D-I-C-K-S-O-N. I'm president of SantaBarbara.com. I'm also a resident of Storke Ranch. My back fence is on Phelps Road. The last time we met with the committee, this committee about UCSB Vision 2025, they mentioned that the traffic on Storke -- on
Phelps Road was 2,000 cars per day which to me was hard to believe because I live there and there is not nearly that much traffic so we asked them where was the traffic and they said they put the intersection at Phelps Road and Storke. I took the measurement in front of my house yesterday for 24 hours and I measured 33 cars total in 24 hours coming behind my back fence. I counted every car that came by and I picked it up and when I was all done, I went in my back yard to pick up my camera and there was a tennis ball and a football from the kids on the playground immediately behind my fence.

I want to emphasize that a lot of children like the children here play in the road behind me and once a week, sometimes three or four times a week an ice cream truck comes by and children swarm on Phelps Road and they play and they buy ice cream and opening Phelps Road is a very dangerous proposition. Having lived there for five years, I've noticed many students running the red light on Storke Road, racing towards Isla Vista. Almost weekly I see drunk driving arrest stations set up by the Police Department with many arrests and what will happen is these people who do run lights and who speed and who get arrested for drunk driving on Storke Road will soon under your plan be
driving along Phelps Road in front of all the children in here. So on behalf of residents of Storke Ranch and the children who wish to not be injured by drunk drivers and speeding students, we respectfully ask you not to open Phelps Road. Thank you.


AUGI AGUILERA,

Offered public comment on the Vision 2025 Draft EIR as follows:


First, I'd like to just go on record as supporting the Storke Ranch residents and community in asking and pleading with you to not open Phelps Road. I agree with all my neighbors and colleagues.

Secondly, I'd like to just state that UCSB is a large and well respected institution. It's a big force here in Santa Barbara. We only moved here a year ago and I'm actually in support of many of the things that UCSB does, but I hold you accountable.
You are driving this change and you have not done your homework adequately on the impacts. In particular for Storke Ranch and for Phelps Road, the EIR cited five areas of significant impact. The intersection of Storke and Mesa is not identified. Storke Ranch was not identified. Another part of your responsibility is leadership. I think one of the speakers earlier said it much more eloquently than I could about the carbon foot fingerprint and the future and responsibility we have for the environmental stewardship we hold for the planet.

You are enabling a bad situation with the growth you are espousing. Recently articles in the Santa Barbara Tribune -- the Santa Barbara Newspaper, excuse me, News Press and also in other national magazines have cited University of California issues with budgets and with enrollment. They're actually turning back students. I think the growth needs to be revisited, capped. I'd like to see the parking spots limited. Also, I would like to ask that you consider the traffic flows also on Storke Ranch side, on the Storke roadside. The sidewalk that's along Storke Road is dangerous. I think the impact report need to be revised. Another comment I'd like to make is today the
situation in the neighborhood is already heavily
impacted by the University. We have -- we have safety
c�� concerns you've heard about. We actually suffer from
vandalism, traffic through the neighborhood, people
that really don't belong there even though there's
signage, there's no enforcement and this is with the
current state, so I shudder to think about the growth
you guys are projecting and again, I'm holding you
accountable since you are inciting this growth. I'd
like the EIR to be revised to address all these
impacts. I guess that's it for now.

MR. SIMPSON: Thank you very much. John
Kalstrom followed by Dawn Heimendinger.

JOHN KALSTROM,
Offered public comment on the Vision 2025
Draft EIR as follows:

MR. KALSTROM: John Kalstrom, J-O-H-N,
K-A-L-S-T-R-O-M. I'm a homeowner at Storke Ranch and I
wanted to reiterate or affirm the comments of our
lawyer Ana Citrin and also Mickey Flacks earlier about
air quality. Like many other homeowners at Storke
Ranch, I oppose vehicle and traffic between Mesa Road
and Phelps Road and my concern especially -- and it was
mentioned earlier but the children that use that area as a playground, that is a cul-de-sac right now. They are relatively safe from traffic there and they have a habit of using that and kids when they get in a habit of doing something are going to continue to do it unless, you know, there's suddenly tons of traffic like there is on Storke Road right now.

They're going to continue to play there and for especially the younger kids this could be a catastrophe. They could get hit by a car in a place such as the gentleman said earlier, a speeding student or someone going too fast and I'm really concerned that that's going to happen unless there's some other way that these kids could be moved somewhere else and you know the low income apartments are there so what do you do? Okay. That's my comment.

MR. SIMPSON: Thank you very much. Dawn Heimendinger followed by Ralph Fertig.

DAWN HEIMENDINGER,

Offered public comment on the Vision 2025 Draft EIR as follows:

MS. HEIMENDINGER: Thank you. My name is Dawn Heimendinger, H-E-I-M-E-N-D-I-N-G-E-R. First of all, I
just want to say that I'm thankful to live in close proximity to such a great university and I'm able to take advantage of a lot of opportunities that are available, in particular UCSB arts and lectures, summer camps so I'm really thankful to have the University here and as a patient of a student at Isla Vista elementary school I really appreciate the hundreds of hours, thousands of hours that the University students volunteer at the school.

All that being said, I want to just state that I agree with Ana Citrin and Mickey Flacks' comments and my home also borders Phelps Road so I oppose the opening of Phelps for many of the reasons that have been stated but a couple -- one that hasn't been stated -- I'm also an emergency room nurse and right now the rescue -- or engine company 11, the company fire department has unfettered access to getting through there with 7,500 cars a day, that the -- the amount of time it's going to take to get through that is going to be significantly impacted.

As an emergency room nurse, I'm concerned about Phelps opening additionally because of the majority of accidents that are caused -- the majority of accidents involve drivers ages 17 to 23 and these drivers also exhibit the riskiest behavior and as an
emergency room nurse, many of you who are in the University are aware of the mind altering substances both legal and illegal that are used here and I'm acutely aware of it because I get to work at night. So I just want you to be cautious about that, too.

Another thing that I'm concerned about is just the loss of tax base. You bought Francisco Torres, you bought the Devereaux property so now that tax base is no longer being paid to the county and I'm not sure exactly how that's mitigated. There's no money going to the Goleta School District. There's no money going to county fire.

You're going to do the initial voter ballot but then is there any ongoing maintenance for road improvement? I'm not opposed to people who can't afford to pay for education but the people who are going to be working here and utilizing this can well afford to help pay for it so the Goleta Union School District will absorb the majority of the costs without getting any tax base from them and then finally you have limited land, limited water, increased pollution. Maybe it's time to tell the Regents we're tapped out and we need to look somewhere else. Thank you.

MR. SIMPSON: Thank you. Next speaker is Ralph Fertig followed by Mark Hildner.
RALPH FERTIG,
Offered public comment on the Vision 2025 Draft EIR as follows:

MR. FERTIG: Good evening. I'm Ralph Fertig, F-E-R-T-I-G. I'm with the Santa Barbara Bicycle Coalition. I came here tonight -- I came from Santa Barbara and noticed that gasoline is four dollars and thirty cents a gallon now. It keeps on going up. I think the age of cheap gas is gone for good. That times are changing drastically, that the vehicle miles traveled and the gasoline consumption has dropped by three to six percent over the last year. It will probably continue to do that some more. The main way that people right now get onto campus is by bicycle. The second way is on foot. We have a community here where the staff, faculty and students are used to bicycling, they're used to walking, they're used to using transit, they're used to alternatives. I worry about the numbers that are used in the EIR for calculating the number of trips that will be generated by the housing around here. Times are changing. I'm afraid that the numbers that are used in the calculations are based on obsolete or obsolescent factors and I suspect that in the future that things
will change drastically, that times are changing
greatly. So I think that all of the mitigations for
the traffic are really misplaced. I don't have any
numbers. I'm not an EIR expert, but anyway, that's my
feeling.

The second thing I'd like to address is Ocean Road; that right now the Pardall Tunnel goes underneath there, that that will be proposed to be removed and the 12 blocks of Ocean Road will have new housing on it for 500 staff and faculty members, that all of the roads in Isla Vista will open up for bicyclists and pedestrians. The only one that will go straight through onto a campus bike path is Pardall. All of the others will have bicyclists and pedestrians who will enter and they will have to jog to the left or right, that when you enter onto the road probably -- they won't signal. You probably won't know what somebody else is doing if they're turning left or right. Then they will go some distance on Ocean Road and then turn again. That will be combined with motorized traffic on there from all the new housing that's going to be put there.

I suggest that a control and management of all the traffic, all the mixed use traffic there is a real challenge. I've been told that maybe traffic signals can be installed. I'm not really sure that that's a
solution. I think a lot of traffic measures will be
used, I hope they will be as development goes forward,
like roundabouts. I could see the road itself being
like a Dutch woonerf which is a slow speed road that
motorists are slowed to 10, 15 miles an hour at the
speed of bicyclists so that they really become partners
rather than combatants in sharing the road space. So
there are a lot of challenges there and we'd like to
work with the University in providing some safe
alternatives. Thank you so much.

MR. SIMPSON: Thank you very much. Mark
Hildner followed by Darlene Chirman.

MARK HILDNER,
Offered public comment on the Vision 2025
Draft EIR as follows:

MR. HILDNER: My name is Mark Hildner,
M-A-R-K, H-I-L-D-N-E-R, and I am a resident of Storke
Ranch and would first like to reiterate the comments of
Ana Citrin and Mickey Flacks.

My comments will be brief. They're directly
related to the opening of Phelps Road and I think the
University has talked quite a bit about their efforts
for preventing students and faculty from actually
driving on campus which I think is a forward looking way to approach transportation issues but they've done the exact opposite in the community. They have addressed these issues by conventional means and the LRDP I think clearly shows that they will not work. In particular opening Phelps to Mesa Road will not solve the UCSB’s traffic problems.

In fact, they will move many of them right down the -- into the community of Storke Ranch and I think the University needs to look at alternative ways to solve these issues in future-leaning ways rather than conventional ways, such as removing cars from the roads and there are a number of ways to do that and they've already mentioned working with the City of Goleta to improve the public transit and also restricting the kinds of people who can have cars on campus, for example, prohibiting freshmen and sophomores from having cars on campus and I think this futuristic approach should be a nobrainer these days. Given the concerns of global warming, the University should be at the forefront of emitting reduction of greenhouse gases.

MR. SIMPSON: Thank you very much. Darlene Chirman followed by Martin Anderson. I'd like to be sure that I have all of the speaker slips of those
wishing to speak tonight.

DARLENE CHIRMAN,

Offered public comment on the Vision 2025 Draft EIR as follows:

MS. CHIRMAN: Good evening. I'm Darlene Chirman, C-H-I-R-M-A-N, representing Santa Barbara Audubon. We'd like to address several issues and we'll give you more detail in a letter. We're concerned that the method within the LRDP to implement the campus wetland plan and also for protections of the Coal Oil Point Reserve there are discrepancies in terms of the parking at Cliffhouse and some places are where it says that it's one of the coastal access sites and another place where there will be no public parking there.

I also like the idea of having a single direction for the slough road with a loopback in through the Devereaux school site. I'd like to really see that evaluated and suggest that there would be an adjacent bicycle and pedestrian. That might be a way of improving the safety along the slough road, but we'd really have to look at it from the standpoint that there are wetlands on both sides so it can't be any wider than it is now.
I'm concerned about the wetland setbacks throughout the campus. There are 100-foot setbacks that are mandated. However, some of the current buildings may not have those setbacks and we have to really look and make sure that the replacement buildings do follow through the required setbacks from the coastal commission.

I think the big issue is really the water supply. It describes the -- that there'll be a shortage of maybe 25 percent relative to the availability of water in Goleta water district, however compared to the current allocations of water it's like 62 percent lower in terms of allowed construction to meet within the current water and again, the methodology to try to address that in terms of reducing the future water needs are not as innovative as I think they could be and we'll put in some more detail in the letter.

The energy goals of the University, both the campus and for the UC system are stated in terms of addressing climate change and some of the very effective ways that the University has addressed energy efficiency to date; however, there does not appear to be any attempt or any possibility of meeting those climate change goals and reductions with the level of
expansion that's proposed. Thank you.

MR. SIMPSON: Thank you.

MARTIN HENDERSON,

Offered public comment on the Vision 2025 Draft EIR as follows:

MR. HENDERSON: M-A-R-T-I-N,

H-E-N-D-E-R-S-O-N. I still haven't heard anyone mention eucalyptus trees. They're a block away from here. You can't miss them. I want everybody to check them out. The 150 year old eucalyptus curtain is protected by state and federal law and it's habitat to the blue heron which is a threatened species under the Federal Endangered Species Act and other local wildlife. If you could check with your own biology department instead of listening to developer consultants you would find out how harmful the removing of the eucalyptus curtain would be to the very foundation of the bluff top, the landmark to the majesty and beauty --

MR. SIMPSON: Sir.

MR. HENDERSON: The University-paid developers use fraud and deception and greedy efforts to land grab our open spaces. They refer to the eucalyptus curtain
as an interface, never even mentioning that they are
trees. Then they say that the area is a desolate no
man's land, when in fact it is enjoyed by thousands on
a daily basis. The University says the trees are
invasive and dangerous in order to cover up their own
neglect, not only of this area but of all the areas
they plan to develop. Just look at the bike paths next
to the Health Center and the science building to see
the level of danger and neglect that the University has
subjected us to. The only thing invasive is the
University's open space land grab.

Then there's the Pardall Tunnel, a world
famous monument of free speech and assembly. To remove
it would create monumental traffic jams like the ones
the University created by the overdevelopment of
Westwood. The Pardall project this summer will result
in the funneling of bike traffic up Pardall Road. This
is the express goal of the I.V. master plan, yet the
University wants to create an intersection for no other
purpose than their warped sense of aesthetics.

If you really want to know what this
University is up to, Google Berkeley Oaks. All the
Regents care about it seems is room for more sports
facilities. That's their values. They don't care
about the workers who can't afford housing,
transportation and have to work the jobs -- have to work a second job and never see their families. Our campuses are our most famous fundraiser. This campus used to be dedicated to positive change in the world; now it seems to be dedicated to war and greed. We need to get back to where we used to be. That's why we need to save the tunnel and save the eucalyptus curtain.

Thank you very much.

MR. SIMPSON: Dominique Julian followed by Darren Johns. And again I would like to encourage people to fill out a speaker slip.

UNKNOWN SPEAKER: Dominique left.

MR. SIMPSON: I understand that Dominique is no longer present. So that would be Darren Johns followed by I guess our last speaker this evening Kelly Hildner.

DARREN JOHNS,

Offered public comment on the Vision 2025 Draft EIR as follows:

MR. JOHNS: My name is Darren Johns, D-A-R-R-E-N, J-O-H-N-S.

A couple points. I'd like to support all points made by Ana Citrin, all comments by Luann
Miller, specifically with regards to a lack of analysis on the impact of the school and daycare infrastructure by the additional 9,000 it looks like population increase. And of course I support all comments as a Storke Ranch resident for keeping Phelps Road closed for all the same reasons mentioned. I want to make one last additional comment which is that I feel the LRDP really does not address a lot of the traffic and utilities impacts stated in the EIR by mitigations for alternative methods of transportation, energy, high energy efficient building designs, all of which are current active research projects and being led by well renowned Nobel prize researchers at the University. It seems like a very big disconnect between the University itself and its plans, so thank you.

MR. SIMPSON: Thank you. I would like to call Bonnie Carpenter. Ms. Carpenter, have you testified before? MS. CARPENTER: No, I have not. MR. SIMPSON: Thank you very much and then Bonnie Carpenter would be followed by Kelly Hildner and then the last speaker slip I have is additional testimony by Jennifer Stroh. I see a hand in the audience with one more speaker slip.
Miss Carpenter.

BONNIE CARPENTER,

Offered public comment on the Vision 2025 Draft EIR as follows:

MS. CARPENTER: Okay. I just want to tell you I'm from the low income housing and I'm on the back unit. What I see is our street going down there where they're saying that the buses -- I'm sorry -- that the -- I'm sorry. I had a stroke so this is very hard for me to do. With the fire engines they go through there. One thing is that right down there all the children play. Not only do they play, but those children do not understand English. They're young and they're most of the people where I live that's why tonight none of these people are here because they did not understand if they could understand what was going on. So the little children that go out and play in the street. Remember, some of the people in our unit are also disabled which I am right now. But they can't even be out with their children, so the children go out and play all around there and you can look at the record.

I've already seen somebody die at the corner
of the street. Somebody came down and they took the
car and they go around right there and they hit them
already, so we already have one person dead right
there. I really hope that you don't open it up for
everybody, especially for me. I'm renting there. I
really like it there. I really worry about the
children and I worry about all the rest of us here,
too. A lot of these people have bought properties
there.

What would you do if this happened in your
back yard? Do you know? What would you do? When
they're saying that they're going to put the buildings
down that are over there right now, they're going to
destroy them. Some of those buildings I think asbestos
is on some of those buildings. Would you like to come
live where I live and have that going down right by
you? Just ask yourself would you want to be in our
positions? Thank you very much.

MR. SIMPSON: Thank you. Kelly Hildner
followed by Jennifer Stroh.

KELLY HILDNER,
Offered further public comment on the Vision
2025 Draft EIR as follows:

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MS. HILDNER: I'm going to be really brief. I mainly just want to say that I strongly support the excellent comments by Mickey Flacks and by Mark Hildner this evening and I just want to also reiterate that I think someone else already made this comment about another reason why Phelps -- opening up Phelps would be such a problem is because the drivers on that road would be the crazy student drivers who we already see driving so unsafely around the rest of the community. And also, I forgot to mention when I talked about improving the transportation system around Goleta outside of the University as well as within the University that one of the important aspects of that that I think you need to analyze thoroughly in the EIR and re-submit the EIR for public comment, but one of the important aspects of that needs to be a very short lag time so that people don't have to wait an hour for the shuttle and I've actually heard maybe more like 10 or 15 minutes. We need quick shuttle service so it'll actually be used and I've heard that MTD has proposed a very innovative thing where you can actually -- they can actually put displays at the shuttle stops, at bus stops that show when the next bus is coming so people know whether or not they've missed a bus and they know how long they'll be waiting, I think that would be an
innovative thing to make the public transportation system work better.

Also, I just want to support the idea of the satellite campus that someone proposed. I thought that was also an excellent idea for alleviating traffic problems. Thanks.

MR. SIMPSON: Thank you. Jennifer Stroh and the last speaker this evening Adriana Kolendrianos.

JENNIFER STROH,

Offered public comment on the Vision 2025 Draft EIR as follows:

MS. STROH: Good evening. My name is Jennifer Stroh, S-T-R-O-H. I'm on the board of Shorelines and Watersheds and a program coordinator for the Santa Barbara Audubon Society. We've all seen bad planning and its impacts. I'm glad that UCSB looked at all of the aspects included in the current LRDP but know that there are resources to make it better. The University needs to improve the current conditions before increasing the number of people here, conditions like better use of or using less water, using less energy, actually making improved transportation systems and better integrating the I.V. master plan in the City of
Goleta. I'm concerned about the impacts on the environmental and sensitive habitats.

At Coal Oil Point Reserve right now over 4,000 people visit per year. With more people there'd be more access and/or recreation. Because of this I'm concerned with additional pressures and destruction of these sensitive habitats and additional disturbances or attacks on endangered species. To prevent predation on the adjacent species adjacent to these developments, future housing should have a condition that pets are not allowed. Thank you.

MR. SIMPSON: Thank you. And our last speakers -- second to last are Adriana and Ernest Kolendrianos.

ADRIANA KOLENDRIANOS,
Offered public comment on the Vision 2025 Draft EIR as follows:


MR. KOLENDRIANOS: That's why I'm here to help out.

MS. KOLENDRIANOS: I'd like to invite you to
come to visit Storke Ranch, Phelps Road, observe these
little vulnerable toddlers at the daycare center.

These might be future students of UCSB and the children
that play in the self-help housing departments as well.

They -- we don't want to compromise their health and
the numbers of cars that are anticipated if Phelps Road
is opened to Mesa Road would be significant and there
have been recent studies done that indicate that being
next to a very busy roadway and with the children being
directly adjacent -- it's really important for you to
come. Come see it yourself to understand what Bonnie
was talking about, you know, about how would you like
to be there? Would you be pleased if it were your
child or grandchild playing out there and being exposed
to the air, the poorer air quality and noise and
dangers of the traffic?

I'm terribly proud of being a member of Santa
Barbara-Goleta area and proud of the University. It's
just an astonishing University, but I expect that the
University would be prideful as well of its neighbors
and care about its neighbors and demonstrate that they
have thought in advance about what the impact might be
on its neighbors that have been all very, very
wonderful neighbors and supportive of you. So we do
ask you to consider that.
We will be exposed to demolition, you know, toxins and so on and we understand that. We would like to see a buffer. We are in total agreement with our attorney, our Storke Ranch attorney as well and I can't remember what else, maybe Ernest has something.

MR. SIMPSON: Thank you very much.

Would you like to separately testify?

ERNEST KOLENDRIANOS, Offered public comment on the Vision 2025 Draft EIR as follows:

MR. KOLENDRIANOS: Yeah. I'm Ernest Kolendrianos, spouse of Adriana. I'm a Hope -- not a Hope Ranch, I'm a Storke Ranch resident and we're in that phase of our lives of seats in the upright position, prepare for landing. We moved to Storke Ranch about eight years ago in anticipation of a joyful relationship with the University which we have enjoyed very much, the cultural benefits, particularly Arts and Letters program. We are -- tonight I've heard how sensitive the University is to, you know, governmental directives to be aware of the slough, the wetlands, the tar plant which I've never heard of but learned of tonight, the rapport which I have heard of.
I think also I'd like to join Adriana to ask the University to likewise consider the sensitivities of the Storke Ranch residents. Right now our backyard overlooks the married student housing. It is really quiet. It's wonderful. I hear an occasional cyclist go by. I hear the rustle of the eucalyptus trees that were alluded to. That's about it. It's really wonderful right now. Please consider the impacts in all of the residents in what you do and we implore that you give consideration to that in the future.


MR. KOLENDRIANOS: Thank you and the last thing, I'm glad that we're at the end of this because I have not heard one person state that he's in favor of opening up Phelps Road to Mesa road. I think that's significant. Most of the people here have these same opinions that I do but I haven't heard a benefit of opening that. I see the obvious reason for it, for access to the shopping centers and so forth but to me it seems like for that you can open up Los Carneros to three lanes or four lanes or six lanes or whatever since it's commercial cars anyway but I'd like to end by saying it's interesting to me that no one has spoken in favor of opening up Phelps Road. I join all of those who say please keep it closed. Thank you.
MR. SIMPSON: Thank you. Our last speaker is additional testimony from Mark Hildner.

MARK HILDNER,

Offered further public comment on the Vision 2025 Draft EIR as follows:

MR. HILDNER: Yes. First of all, I'd like to reiterate both sets of comments from Kelly Hildner but I'd like to elaborate on one of them. The last one being the idea of shuttle service and I think what I see the University doing in terms of the community trying to solve traffic issues as I said with conventional means, but I think they were not things that were looking at how the community can work with the University to solve problems and I think to the benefit of both the University and the community, so I think the public transit system would not only benefit the community and remove the cars but it would be something very beneficial to the community members themselves. It would be something they could use. Particularly living in Storke Ranch if there were something providing the University residents with the public shuttle system that was workable, I know I would use it and it would be a great benefit to me and I
think other community members in Storke Ranch.

MR. SIMPSON: Thank you very much. And having no more speaker slips in front of me, I will adjourn tonight's public hearing. Thank you.

(Whereupon the proceedings concluded at 9:40 p.m.)
HEARING REPORTER'S CERTIFICATE

STATE OF CALIFORNIA) SS.


I FURTHER CERTIFY THAT I AM NOT RELATED TO ANY PARTY TO THIS MATTER NOR AM I INTERESTED IN THE OUTCOME THEREOF.

IN COMPLIANCE WITH SECTION 8016 OF THE BUSINESS AND PROFESSIONS CODE, I CERTIFY UNDER PENALTY OF PERJURY THAT I AM A CERTIFIED SHORTHAND REPORTER WITH LICENSE NUMBER 7423 IN FULL FORCE AND EFFECT.


MICHELLE M. SABADO, CSR 7423
CERTIFIED SHORTHAND REPORTER
OF THE STATE OF CALIFORNIA
Response to Comment I-44-1 (Parsons). As discussed in the Land Use and Development section of the LRDP, the plans for Storke Campus involve housing with a 20-foot height limit on the western periphery. The access road and buffer area would remain. The housing units proposed on the western edge of Storke Campus are single family attached homes, providing a density gradient from the apartments and townhouses to the east and the single family detached homes in Storke Ranch. Mitigation for Impact AES-4 has been amended to further address issues related to aesthetics and neighborhood transition; please see Response to Comment I-7-1. Please see Master Response - Phelps/Mesa Connection for other comments.

Response to Comment I-44-2 (Thomson). A. Regarding the current water situation in California and how the water analysis for the Project accounts for global warming impacts on water supply, please see response to comment A-10-16 and Master Response – Water Supply, section IV.B. The RDEIR’s water analysis accounts for future dry years by analyzing both single critical dry years and multiple dry years on pages 4-14-37 and -38.

B. Regarding the safety concerns for Phelps Road, please see Master Response - Phelps/Mesa Connection.

Response to Comment I-44-3 (Haskins). Please see Master Response - Phelps/Mesa Connection.

Response to Comment I-44-4 (Esparza). Please see Master Response - Phelps/Mesa Connection.

Response to Comment I-44-5 (Humphris). The County of Santa Barbara uses a standard parking space size of 9 feet by 16.5 feet, or 148.5 square feet per space (Development Code Section 35.36.080, M). At 3,000 spaces, this would be 445,500 square feet, or approximately 10.2 acres of parking. However, the University will employ its own standard parking size when development occurs, and the exact amount of additional parking on campus in terms of acres will not be known until that time.

Regarding transit improvements, please see response to comment A-12-48.

Response to Comment I-44-6 (Bultan). Comments noted.

Response to Comment I-44-7 (Cerra). Devereux Slough water quality monitoring is not a mitigation measure identified in the present EIR. The DEIR concludes that with identified mitigation, impacts related to water quality and aquatic resources will be less than significant. (DEIR at 4.3-30 through 38, 4.7-26 through 39) No further mitigation is required.

Response to Comment I-44-8 (Hankin). A. The LRDP proposes an extensive program of improvements to the bicycle system. Closing the Pardall tunnel would occur in conjunction with new connections between Isla Vista and campus across Ocean Road, as well as other areas of campus. The following is excerpted from the RDEIR Transportation Section (p. 4.13-27).

“The LRDP proposed to provide five new bicycle and pedestrian connections between Isla Vista and the main campus along Ocean Road. The connections would occur at El Greco, Cordoba, Madrid, Seville, and Sabado Tarde. The existing bicycle connections at Picasso and Trigo would continue to provide access between Isla Vista and the Main Campus. With the construction of the proposed connections, the existing grade separated crossing at Pardall providing access between the main campus and Isla Vista would be removed. The bicycle and pedestrian circulation improvements are shown in Figures 3-12 and 3-13, respectively, and summarized below.

- Shared bike route along the southern section of Ocean Road
- Completion of the Broida expressway on the main campus
The closure of Pardall tunnel would support an overall effort to unify the transportation network of the campus and strengthen the visual character of Ocean Road. As discussed on page 4.13-157 of the recirculated Transportation Section, bicyclists presently using Pardall tunnel would be able to use five additional connections between Isla Vista and Main Campus. The EIR does recognize the removal of Pardall tunnel as a significant impact to bicyclists. However, the EIR requires that development of these connections and all associated roadways and bicycle/pedestrian paths implement design standards for the safety of users. As noted in the EIR, a detailed bicycle study will be prepared as part of the Ocean Road Housing Project. These mitigation measures will reduce the impact of the tunnel closure to a less than significant level.

B. Please see response to comment A-12-48.

C. Light and glare is discussed throughout Section 4.1 of the EIR. Mitigation Measures AES-7A, B and C require all LRDP development to use directional lighting and other limitations to minimize impacts on nighttime views (EIR, p. 4.1-41).

Response to Comment I-44-9 (Citrin).  A. Please see Master Response - Phelps/Mesa Connection.

B. Please see response to comment A-12-48. Regardless of alternative transportation systems, not opening the Phelps/Mesa road connection would worsen impacts to nearby intersections.

Response to Comment I-44-10 (Hildner).  A. Comment noted.

B. The proposed enrollment cap alternative would not meet the Project’s objectives of maturing the academic programs or accommodating the Campus’ share of statewide University of California enrollment increases. See DEIR at 1.0-3 through 5.0-1.

C. Regarding water supply during drought years, the RDEIR concludes that that the projected future water supplies are sufficient, with mitigation, to provide for the projected demand associated with buildout of the LRDP (RDEIR at 4.14-37 to 38). Please see Master Response - Water Supply, section II.

D. Commenter’s concerns about density are noted. Regarding the transition between proposed new housing and Storke Ranch, please see response to comment I-7-1.

The EIR accounts for the impacts of previously approved projects and plans through its analysis of cumulative impacts.

E. Please see Response to Comments I-7-1.

F. Regarding the transition between proposed new housing and Storke Ranch, please see response to comment I-7-1.

Regarding the proposed buffer to protect sensitive habitat areas, various LRDP Policies requires a minimum 100-foot buffer between development and sensitive habitat areas, including wetlands, for all areas within the environmental sensitive habitat area (ESH-13, 16, 21, and 22).

G. Regarding the proposed policy on student cars, please see response to comment I-26-8B.
Regarding the widening of El Colegio Road, please see response to comment I-30-1.

Regarding improved pedestrian and bicycle routes, please see Impact TRAFFIC-7 (RDEIR p. 4.13-155), which discusses the many pedestrian and bicycle improvements, including Class I, II, and III bike routes and pedestrian paths, proposed as part of the LRDP. Please see also LRDP Figure E.2.

Response to Comment I-44-11 (Scott). Please see response to comment I-44-10G.

Response to Comment I-44-12 (Miller). A. Please see response to comment I-42-20.

B. Please see Master Response - Phelps/Mesa Connection.

Response to Comment I-44-13 (Klein). A. The EIR accounts for the impacts of previously approved projects and plans through its analysis of cumulative impacts.

B. The El Colegio/Los Carneros arterial is studied in the LRDP EIR and is identified on pages 4.13-5, 8, and 16, and was determined to have an existing level of service of “D”, which exceeds the threshold for an acceptable level of service. As noted in Impact TRAFFIC-5 (p. 4.13-145), mitigation will include alternative transportation enhancements, and payment of fair-share contributions toward street and intersection improvements. As identified on page 4.13-149, this would include the widening of Los Carneros to four lanes between El Colegio and the City/County border north of Mesa Road. Other improvements are identified for nearby roadways and intersections, for which the University will contribute funding. In addition, as explained beginning on page 4.13-70, the traffic analysis takes into consideration these other projects, including the Isla Vista Master Plan, Camino Real Marketplace, Village at Los Carneros, and the Cabrillo Business Park.

C. Evacuation plans and procedures are discussed in DEIR Sections 4.6.1.8 and 4.6.1.9. As stated on page 4.6-27, campus construction has the potential to temporarily impact evacuation plans, and mitigation requires that evacuation plans be modified as necessary prior to construction. To ensure that campus construction does not disrupt established evacuations plans for Isla Vista, the following mitigation has been added to Impact HAZ-6:

| LRDP Mitigation HAZ-6C: | Before construction commences on any building or facility that could adversely affect an existing evacuation plan for Isla Vista, the University shall consult with the County of Santa Barbara to evaluate affected plans and, if necessary, modify if necessary to accommodate both the construction phase alterations as well as the final facilities. The University shall consult with the County in reviewing evacuation plans after the footprint of the building and lay down areas have been established, which should occur well in advance of construction. |

Response to Comment I-44-14 (Null). Figures 4.13-4A and 4.13-4B illustrate the proposed bicycle and pedestrian facilities with the LRDP, which includes recreational, separated, and shared routes for both modes of travel. Safety issues were a part of the analysis of bicycle and pedestrian impacts in the Traffic section, and these are reduced to a less than significant level by mitigation and appropriate design as various components of the LRDP are developed.

Response to Comment I-44-15 (Flacks). A. Information regarding increased demand for enrollment is derived from system-wide enrollment projections by the UC Office of the President, which in turn are calculated from population growth projections by the Department of Finance. The University as a whole has an obligation to maintain access for 12.5% of high school graduates in the state. The California Master Plan
for Higher Education specifies that the top 12.5 percent of California high school graduates should be considered eligible for UC admission. (http://www.ucop.edu/acadinit/mastplan/mp.htm) More can be found in Section 1.4 of the EIR.

B. The EIR discusses as required the relative impacts of the Reduced Enrollment alternative as compared to the proposed project. CEQA does not require a predetermined length of discussion for alternatives. According to CEQA Guidelines Section 15126.6(a), “there is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.” However, the EIR does make an assessment of this alternative and how it would impact the environment in comparison to the other alternatives. For more information, please see response to comment I-5-46.

Response to Comment I-44-16 (Potter). Please see response to comment A-12-1.

Response to Comment I-44-17 (Uribe). A. Please see response to comment I-42-12.

B. The LRDP proposes to provide housing to accommodate new faculty, staff, and students on campus. Thus, employment growth at the University will only impact the regional housing market as faculty and staff retire and are no longer accommodated in on-campus housing. The LRDP will thus spread out its contribution to housing market pressure over time, as employees will retire at different ages and no single year will see a substantial number of people added to the market. Moreover, not all retirees will stay in the area (although it must be acknowledged that many will stay). Overall, the additional market pressure exerted by University retirees is unlikely to make a substantial contribution to overall housing demand. A University-owned retirement home therefore would not be an effective means of reducing any of the Project’s significant impacts. Ultimately, the need for and effectiveness of this mitigation will be driven by demand for retirement residences among University affiliates. The University will continue to observe that demand, and will consider such proposals as appropriate.

C. Regarding the Reduced Enrollment Alternative, please see responses to comments I-44-10B and I-44-15B. The commenter’s proposed alternative would, like the Reduced Enrollment Alternative, fail to meet the Project’s objectives regarding increased enrollment. At the same time, it would abandon that alternative’s environmental benefits, because it will build housing on campus and cause all of the environmental impacts associated with such construction. Housing exiting Campus population, which appears to be the goal of this proposal, would not address any of the Project’s potential environmental impacts.

Response to Comment I-44-18 (Flacks). A. The analysis of cumulative transportation impacts is on pages 4.13-70, 71, and 72 of the RDEIR. The traffic analysis assumes full buildout of the Goleta General Plan, the Isla Vista Master Plan, and other relevant unincorporated areas of the County (see response to comment I-44-13B). This assumption is used to generate an estimated future population. The analysis then applies trip-generation rates to the population. These rates, which are derived from national averages and on-campus surveys, account for all trips generated by a given population, including non-commute trips and non-campus affiliates using roadways and intersections. See EIR page 4.13-64.

B. Please see responses to comments R-4-19, R-4-19, A-12-48 and A-13-1 concerning the efforts the University will undertake to enhance transit service throughout the region.

C: Comment noted.

Response to Comment I-44-19 (Blabey). Comments noted.

Response to Comment I-44-20 (Brofferio). Please see Master Response - Phelps/Mesa Connection.

Response to Comment I-44-21 (Dickson). Please see Master Response - Phelps/Mesa Connection.

Response to Comment I-44-22 (Aguilera). A. Please see Master Response - Phelps/Mesa Connection.
B. Please see response to comment I-44-10B.

C. Please see response to comment I-8-4.

D. Please see Master Response - Phelps/Mesa Connection.

E. Please see response to comment I-16-5.

Response to Comment I-44-23 (Kalstrom). Please see Master Response - Phelps/Mesa Connection.

Response to Comment I-44-24 (Heimendinger). Please see the Phelps Road Master Response and the Fiscal Impacts Master Response.

Response to Comment I-44-25 (Fertig). A. The Transportation Section of the RDEIR includes extensive analysis of both on- and off-campus traffic. Trip generation rates are discussed starting at page 4.13-64 in the RDEIR, which includes extensive exposition of the rates used, including a description of surveys undertaken to refine them.

B. Please see response to comment I-44-8.

Response to Comment I-44-26 (Hildner, M.). Please see Master Response – Phelps/Mesa Connection.

Response to Comment I-44-27 (Chirman). A. Please see pages 4.3-34 to 38 for information on the campus Wetland Plan and protections for Coal Oil Point Reserve (EIR p. 4.3-34 to -38). There is currently no public parking at Coal Oil Point, and the LRDP does not propose any. There is limited staff/researcher parking near the Reserve facility that will remain in some form, and new coastal access parking is proposed at the Devereux site, but no public access parking will be allowed at Coal Oil Point.

LRDP Policy Trans-4 has been amended as follows: “… the campus shall allow for up to 80 coastal access permit parking spaces on the North and West Campuses, distributed among four locations; the north entrance to West Campus, the Camino Majorca entrance to West Campus Bluffs, the western terminus of Phelps Road, and at Coal Oil Point.” The California Coastal Commission has approved 20 spaces at Camino Majorca, 20 spaces at Phelps Road, and 20 spaces at the north entrance of campus. The initially proposed parking spaces at the COPR have been removed from the LRDP per Coastal Commission direction.

B. The suggestions regarding Slough Road are noted and will be considered at the time a specific project to redevelop the road moves forward.

C. Pursuant to mitigation for Impact BIO-1, all LRDP development will be required to minimize potential disturbances within the 100-foot setbacks from environmentally sensitive areas, and all development shall be subject to the restrictions set forth in LRDP Policies ESH-16, 21, and 22, as pertains to mandatory distances from wetlands.

D. Please see Master Response - Water Supply, sections I, II, and V.

E. Please see response to comment R-19-9B. The University will continue to implement energy efficiency and sustainability measures through all LRDP-related development.

Response to Comment I-44-28 (Henderson). A. Please see response to comments A-12-53 and 60 regarding under which conditions eucalyptus trees may be removed. As required by LRDP Policy ESH-4 and
EIR Mitigation Measures BIO-3A and B, trees cannot be removed if they provide habitat for sensitive species.

B. Please see response to comment I-44-8 regarding the Pardall tunnel.

All other comments are noted.

Response to Comment I-44-29 (Johns). A. Please see response to comment I-44-12.

B. Please see Master Response - Phelps/Mesa Connection.

C. Please see response to comments R-4-19, R-4-19, A-12-48 and A-13-1 regarding alternative transportation strategies.

D. As discussed in Impact UTIL-3 (EIR, p. 4.16-20), the University has participated in an aggressive approach to the efficient use of resources, including the Campus Energy Program, participation in the California Climate Action Registry, the Campus Sustainability Program, and the Savings by Design Program. These programs will continue to be implemented and will apply to all relevant development under the LRDP.

Response to Comment I-44-30 (Carpenter). Comments noted. Please see the Phelps Road Master Response.

Response to Comment I-44-31 (Hildner, K.). A. Please see the Phelps Road Master Response.

B. Please see response to comments R-4-19, A-12-48 and A-13-1 regarding alternative transportation strategies.

C. Please see response to comment I-42-12.

Response to Comment I-44-32 (Stroh). A. Pursuant to CEQA, the EIR analyzes and mitigates environmental impacts potentially caused by the proposed Project, rather than existing conditions.

B. Regarding indirect impacts on sensitive species, please see response to comment I-36-59. As discussed in response to comment I-44-11A, the LRDP has been changed to eliminate reference to parking improvements at Coal Oil Point. The lack of formal parking should discourage large increases in recreational use of the area.

While a ban on pets may reduce predation on certain wildlife species, it was also make University housing less desirable. This would impede the LRDP’s goal of housing all new faculty, staff, and students on Campus and potentially lead to increased environmental impacts related to traffic and air quality, as fewer people would opt to live in on-Campus housing.

Response to Comment I-44-33 (Kolendrianos, A.). Please see Master Response - Phelps/Mesa Connection.

Response to Comment I-44-34 (Kolendrianos, E.). Please see Master Response - Phelps/Mesa Connection.

Response to Comment I-44-34 (Hildner, M.). Comments noted.
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<tbody>
<tr>
<td>Ellie Corigliano</td>
<td>546 Poppyfield Pl Goleta CA 93117</td>
</tr>
<tr>
<td>Carol Clark</td>
<td>533 Peppergrass Ct. 93117</td>
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<tr>
<td>Tony Lethaby</td>
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<td>Patricia Alvarez</td>
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<td>Jesus Alvarez</td>
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<td>Robert Woods</td>
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<td>David McCurry</td>
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<td>Susan McCurry</td>
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<td>Fau Fong</td>
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<tr>
<td>Sungjin Cho</td>
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<td>Joyce Cho</td>
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<tr>
<td>Ben Choi</td>
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<tr>
<td>Wendy Lynch</td>
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<tr>
<td>Sonia Coker</td>
<td>492 Coolbrook Ln</td>
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<td>CA Coker</td>
<td>492 Coolbrook Ln</td>
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<tr>
<td>Frank Kaminiz</td>
<td>489 Cool Brook Ln, Goleta 93117</td>
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<td>Nancy Ramos</td>
<td>489 Cool Brook Ln, Goleta 93117</td>
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<tr>
<td>Ken DeNeme</td>
<td>476 Cool Brook Ln, Goleta CA 93117</td>
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<tr>
<td>Chris Kolendriandes</td>
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<tr>
<td>Megan Kolendriandes</td>
<td>467 Coolbrook Lane, Goleta, CA 93117</td>
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<tr>
<td>Kayoko Ueki-Galler</td>
<td>452 Cool Brook Ln, Goleta CA 93117</td>
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<td>Michael Galler</td>
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<td>Jason Trimouns</td>
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<td>Brianna Craft</td>
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<td>John Law</td>
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<td>Chuck Turk</td>
<td>536 Fireside Lane, Goleta, CA 93117</td>
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<tr>
<td>Timothy F. Morin</td>
<td>540 Fireside Ln</td>
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<tr>
<td>Elizabeth Shasberger</td>
<td>544 Fireside Lane, Goleta, CA 93117</td>
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<tr>
<td>Mary Novatt</td>
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<tr>
<td>Dee Cuthbert</td>
<td>524 Pepperglass Ct, Goleta, CA 93117</td>
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<td>Cameron</td>
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<td>Suzanne</td>
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<td>Terri Ipsen</td>
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<td>Marsha Goldner</td>
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<td>6864 SILVER FERN COURT</td>
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<td>DEB</td>
<td>6868 SILVER FERN COURT</td>
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<td>JUAN JR</td>
<td>6888 EVENING SONG COURT</td>
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<td>WILMA LOPEZ</td>
<td>6892 EVENING SONG COURT</td>
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<td>JONES</td>
<td>6896 EVENING SONG CT.</td>
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<td>JIMÉNEZ</td>
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<td>HERRERA SOLIZ</td>
<td>6899 EVENING SONG COURT</td>
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<td>MARGARITA LAMB</td>
<td>6887 EVENING SONG C.</td>
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<td>ALEX FLORES</td>
<td>581 POPPYFIELD Pl.</td>
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<td>JULIETTA ENRIQUEZ</td>
<td>580 POPPYFIELD Pl.</td>
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<tr>
<td>Darlene Pisacane</td>
<td>6773 Sweetwater City</td>
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<tr>
<td>Laura Schonew</td>
<td>6761 Sweetwater Way</td>
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<tr>
<td>Carl Ravera</td>
<td>6808 Shadowbrook Dr.</td>
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<tr>
<td>Lawrence Johnson</td>
<td>6805 Shadowbrook Dr.</td>
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<tr>
<td>Louis Pisacane</td>
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<td>Joseph Patrick Yechum</td>
<td>6789 Sweetwater Way</td>
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<td>Michael Levy</td>
<td>6797 Sweetwater Way</td>
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<td>Julia Oved</td>
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<td>Vladimir Oved</td>
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</tr>
<tr>
<td>Will FF</td>
<td>6873 Shadowbrook</td>
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<tr>
<td>Steve &amp; Dawn Outlaw</td>
<td>660 Greenleaf Ct.</td>
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<tr>
<td>Mary Miller</td>
<td>462 Greenleaf Ct.</td>
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<tr>
<td>Alfredo  Meyers</td>
<td>457 Greenleaf Ct.</td>
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<tr>
<td>Robert Ball</td>
<td>6894 Meadowlance Ct.</td>
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<td>James Yeats</td>
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<td>Cyril Humphris</td>
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<td>Ena Guardiola</td>
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<td>Maryann Mendlew</td>
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<td>Don &amp; Sharon Gorenkis</td>
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<tr>
<td>Lynn Williams</td>
<td>471 Orange Blossom Lane</td>
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<tr>
<td>Jane M. Williams</td>
<td>471 Orange Blossom Ln, 93117</td>
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<tr>
<td>Sue McDonald</td>
<td>467 Orange Blossom Ln.</td>
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<td>Rod W.</td>
<td>467 Orange Blossom Lane</td>
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<td>Leda T.</td>
<td>502 High Ave.</td>
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<tr>
<td>Leslie Brown</td>
<td>526 High Grove Ave.</td>
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<td>Cheryl Whalen</td>
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<td>Soterios Anastasios</td>
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<td>Rick Johnson</td>
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<td>Gayle Porter</td>
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<td>Paula Kirchhoff</td>
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<tr>
<td>Lisa Balch</td>
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<td>Jim Moore</td>
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<td>John Kalstrom</td>
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<td>Remy LeFrand</td>
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<td>James Scott</td>
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<td>John Dickson</td>
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<td>Carl Stenley</td>
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<tr>
<td>Andrew Coffin</td>
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<td>Betty Coffin</td>
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<td>Michael Gaidler</td>
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<td>Masafumi Hasegawa</td>
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<td>Megan Kalendrianos</td>
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<td>Andrea Forty</td>
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<td>Robb Coleman</td>
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<td>Joe Dodaro</td>
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<td>Janis Choke</td>
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<td>Martina Hichenfelder</td>
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<td>Mickey Esparza</td>
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<td>David Esparza</td>
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<td>Anna Hernandez</td>
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<td>Ted Shinn</td>
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<td>ABE JAHAN Hay</td>
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<td>Ubaid</td>
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<td>Albert Cateal</td>
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<td>Stuart Rummel</td>
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<td>Camille Deaver</td>
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<td>Amy Jonge</td>
<td>557 Sweet Rain Pl Goleta</td>
</tr>
<tr>
<td>Nathan Rodriks</td>
<td>455 Orange Blossom Lane Goleta</td>
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<tr>
<td>Leticia M. Pacheco</td>
<td>6896 Willowgrove Dr. Goleta</td>
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<tr>
<td>Roberto Pacheco</td>
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<tr>
<td>Rich Clayton</td>
<td>552 Sweet Rain Place Goleta</td>
</tr>
<tr>
<td>Christi Clayton</td>
<td>552 Sweet Rain Pl. Goleta</td>
</tr>
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(KAUFFER)
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<tbody>
<tr>
<td>Mickey Espinoza</td>
<td>6828 Shadowbrook Dr., Goleta, CA</td>
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<tr>
<td></td>
<td>(3815 Shadowbrook Dr.)</td>
</tr>
<tr>
<td>Tony Silva</td>
<td>6812 Shadowbrook Dr.</td>
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<tr>
<td>John Norris</td>
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<tr>
<td>Dennis Kavanagh</td>
<td>6804 Shadowbrook Dr. Goleta</td>
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<td>(6815 Shadowbrook Dr.)</td>
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<tr>
<td>Gary Baskin</td>
<td>6815 Shadowbrook Dr.</td>
</tr>
<tr>
<td>Paul Cinnanti</td>
<td>6823 Shadowbrook Dr.</td>
</tr>
<tr>
<td>Jerry Maria</td>
<td>6823 Shadowbrook Drive</td>
</tr>
<tr>
<td>Christopher Davis</td>
<td>6819 Shadowbrook Dr. Goleta</td>
</tr>
<tr>
<td>H. A. Morrow</td>
<td>PO Box 41456 SB, CA 93140</td>
</tr>
<tr>
<td>Sarah Mencia</td>
<td>1079 E. Hatley SB, CA 93101</td>
</tr>
<tr>
<td>Ashley Stillman</td>
<td>6815 Shadowbrook Dr.</td>
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<tr>
<td>Sara Jones</td>
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<tr>
<td>Natasha</td>
<td>6800 Shadowbrook Dr.</td>
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<tr>
<td>Joyce Williams</td>
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<tr>
<td>Bill</td>
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<tr>
<td>Ruby Hanford</td>
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<tr>
<td>Sherry</td>
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<tr>
<td>Andrea</td>
<td>6846 Shadowbrook Dr.</td>
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<tr>
<td>Dawn</td>
<td>6862 Shadowbrook Dr.</td>
</tr>
<tr>
<td>Jim</td>
<td>682 St. 11</td>
</tr>
<tr>
<td>Andrew Warner</td>
<td>6861 Shadowbrook Dr.</td>
</tr>
<tr>
<td>William P. Warner</td>
<td>6866 Shadowbrook Dr.</td>
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<tr>
<td>E. J. Marshall</td>
<td>6866 Shadowbrook</td>
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<td>Terry Castorionitis</td>
<td>6859 Butterwood Cn, Goleta, CA 93117</td>
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<tr>
<td>Daran Johns</td>
<td>6840 Butterwood Lane, Goleta, CA 93117</td>
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<tr>
<td>Mark H. Holdman</td>
<td>6823 Silkberry Ln, Goleta, CA 93117</td>
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<td>William F. Feehery</td>
<td>6873 Shadowbrook Dr, Goleta, CA 93117</td>
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<td>Anne-Marie Charest</td>
<td>6859 Shadowbrook Dr, Goleta, CA 93117</td>
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<tr>
<td>Marcel Trembly</td>
<td>6859 Shadowbrook Dr, Goleta, CA 93117</td>
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<tr>
<td>Nancy Ramlo</td>
<td>189 Cool Brook Ln, Goleta, CA 93117</td>
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<tr>
<td>Emmanuel Staff</td>
<td>6863 Southwold Way, Goleta CA 93117</td>
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<tr>
<td>Paul Kirchoff</td>
<td>6835 Butterwood Ln, Goleta 93117</td>
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<tr>
<td>Elizabeth Shadberger</td>
<td>544 Fireside Lane, Goleta, CA 93117</td>
</tr>
<tr>
<td>Kim Delkine</td>
<td>476 Cool Brook Ln, Goleta, CA 93117</td>
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<td>Adriane Kolendriagos</td>
<td>6769 Sweetwater Way 93117</td>
</tr>
<tr>
<td>Ernest Kolendriagos</td>
<td>6769 Sweetwater Way 93117</td>
</tr>
<tr>
<td>Vesna DeBarra</td>
<td>6826 Phelps Rd #101 Goleta CA 93117</td>
</tr>
<tr>
<td>Martin dela Reina</td>
<td>6826 Phelps Rd #101 Goleta CA 93117</td>
</tr>
<tr>
<td>Samantha dela Reina</td>
<td>6826 Phelps Rd #101 Goleta CA 93117</td>
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<tr>
<td>Shoula Jaurgu</td>
<td>6826 Phelps Rd #205 Goleta CA 93117</td>
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<tr>
<td>Guadalupe Santillan</td>
<td>6826 Phelps Rd #205 Goleta CA 93117</td>
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<tr>
<td>Rosa Santillan</td>
<td>6826 Phelps Rd #205 Goleta CA 93117</td>
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<tr>
<td>Marima Sanchez</td>
<td>6810 Phelps Rd #110 Goleta CA 93117</td>
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<tr>
<td>Luz Campbell</td>
<td>6826 Phelps Rd #204 Goleta CA 93117</td>
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<td>Ricardo Franco</td>
<td>6826 Phelps Rd #104 Goleta CA 93117</td>
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<tr>
<td>Ryan T Gardner</td>
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<tr>
<td>Enrique Avila</td>
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<td>Maria Avila</td>
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<tr>
<td>Maria Villavicencio</td>
<td>6810 Phelps Rd #112 Goleta CA 93117</td>
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<tr>
<td>Carmen Juarez</td>
<td>6810 Phelps Rd #111 Goleta CA 93117</td>
</tr>
<tr>
<td>Thu Nguyen</td>
<td>6810 Phelps Rd #212 Goleta CA 93117</td>
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<tr>
<td>Betty O.</td>
<td>6810 Phelps Rd. 209</td>
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<tr>
<td>Edith Sanchez</td>
<td>6810 Phelps Rd 209</td>
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<tr>
<td>Norma Mendosa</td>
<td>&quot;</td>
</tr>
<tr>
<td>Amalia Aragon</td>
<td>6810 Phelps #108</td>
</tr>
<tr>
<td>Socorro Cervantes</td>
<td>6810 Phelps #107</td>
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<tr>
<td>Roberto Cervantes</td>
<td>6810 Phelps #107</td>
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<tr>
<td>Julia Mato</td>
<td>6806 Phelps - 113</td>
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<td>Catalina Carlos</td>
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<tr>
<td>Ana Aguilera</td>
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<td>Bonnie Carpenter</td>
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<td>Nahmer Mangham</td>
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<td>Brandon Smith</td>
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<tr>
<td>William Phillips</td>
<td>6810 Phelps Rd Apt #114</td>
</tr>
<tr>
<td>Kelly Cuevas</td>
<td>(805) 708-045 #115</td>
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<tr>
<td>Silvia Vazquez</td>
<td>6810 Phelps Rd 211</td>
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<tr>
<td>Vanessa Lumpkin</td>
<td>772 Juniper Walk Apt. B Goleta, CA 93117</td>
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<td>Jayne Shope</td>
<td>771 Juniper Walk #E Goleta, CA 93117</td>
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<td>Jeff Michaels</td>
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<td>Brian Williams</td>
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<td>Gingin Zia</td>
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<td>Karen Bishop</td>
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<td>Elgin McDaniel</td>
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<td>Michael McDaniel</td>
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<td>Joffe Goyal</td>
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<td>Melissa Z. Morgan</td>
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<tr>
<td>Natalia Newcomb</td>
<td>760 E Cypress Walk, Goleta, CA 93117</td>
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<tr>
<td>Kristen Papac</td>
<td>761 Birch Walk Apt. E goleta, CA 93117</td>
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<tr>
<td>R. Shirazi</td>
<td>761 &quot; AptE &quot; &quot; &quot;</td>
</tr>
<tr>
<td>A. Morrill</td>
<td>761 &quot; B 93117</td>
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<tr>
<td>S. Carsman</td>
<td>792 Willow Walk Apt. E</td>
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<tr>
<td>S. Teck</td>
<td>792 Willow Walk Apt A goleta, CA 93117</td>
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<td>Emily Schmidt</td>
<td>792 Willow Walk Apt H Goleta CA 93117</td>
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<tr>
<td>Kalene Miller</td>
<td>758 Oak Walk Apt A Goleta, CA 93117</td>
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<tr>
<td>Daisy Rejnbloom</td>
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<tr>
<td>Carla Coccotti</td>
<td>758 Oak Walk Apt D Goleta 93117</td>
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<tr>
<td>Britt Howard</td>
<td>784 Laurel Walk #A</td>
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<tr>
<td>Hyungsuk Moon</td>
<td>784 Laurel Walk #G</td>
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<tr>
<td>Abdul Hackim</td>
<td>784 Laurel Walk #L</td>
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<tr>
<td>Nelson Coates</td>
<td>784 Laurel Walk #K</td>
</tr>
<tr>
<td>Dan Mulcahy</td>
<td>737 Acacia # A</td>
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<td>Julie Smith</td>
<td>762 J. Birch, Goleta</td>
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<tr>
<td>Bob Johnson</td>
<td>1309 Aster Lane, Campus</td>
</tr>
<tr>
<td>Ashley McLaughlin</td>
<td>796 Juniper Walk Apt C, Goleta CA 93117</td>
</tr>
<tr>
<td>Adela Corder</td>
<td>796 Juniper Walk Apt E, Goleta CA 93117</td>
</tr>
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<td>Michael Daley</td>
<td>797 Sequoia Walk Apt E, Goleta CA 93117</td>
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<td>Brian Barnes</td>
<td>773 Juniper Walk Apt A, Goleta</td>
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<tr>
<td>Bianca Briggs</td>
<td>773 Juniper Walk Apt F, Goleta CA 93117</td>
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<tr>
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<td>794 Cypress Walk Apt C, Goleta CA 93117</td>
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<td>Tyler &amp; Jaime Shelbert</td>
<td>794 Cypress Walk, Goleta, CA 93117</td>
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<tr>
<td>Monica Lambi</td>
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<tr>
<td>Joseph Dodero</td>
<td>6818 Silkberry Ln</td>
<td>—</td>
<td>708-5741</td>
</tr>
<tr>
<td>Patricia Ryan</td>
<td>6839 Silkberry Ln</td>
<td>—</td>
<td>685-1790</td>
</tr>
<tr>
<td>Debbie Mckin</td>
<td>6831 Silkberry Ln</td>
<td>—</td>
<td>968-0858</td>
</tr>
<tr>
<td>Tiffie Larson</td>
<td>6817 Silkberry Lane</td>
<td>—</td>
<td>688-6667</td>
</tr>
<tr>
<td>Sheryl Barnard</td>
<td>6811 Silkberry Ln</td>
<td>—</td>
<td>571-1610</td>
</tr>
<tr>
<td>Kelly Hildner</td>
<td>6823 Silkberry Ln.</td>
<td><a href="mailto:kelly@dock.net">kelly@dock.net</a></td>
<td>685-3621</td>
</tr>
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**Petition Opposing the Opening of Phelps/Mesa Road to Through Traffic**

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<td>Brie Finegold</td>
<td>784 Laurel Walk Apt. J</td>
<td><a href="mailto:briefly@math.ucsb.edu">briefly@math.ucsb.edu</a></td>
<td>805-637-1923</td>
</tr>
<tr>
<td>Jerry White</td>
<td>317 Pacific Oaks Rd</td>
<td></td>
<td>968-0217</td>
</tr>
<tr>
<td>Frank Zanowicz</td>
<td>225 Pacific Ocean #103</td>
<td></td>
<td>259-8581</td>
</tr>
<tr>
<td>Arpan Chakraborty</td>
<td>7776 Madrono Walk # A</td>
<td><a href="mailto:Srabanth@umail.ucsb.edu">Srabanth@umail.ucsb.edu</a></td>
<td>805-284-6352</td>
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<tr>
<td>Ashish Kumar</td>
<td>731 Elkay Walk</td>
<td><a href="mailto:Kumar@lifesci.ucsb.edu">Kumar@lifesci.ucsb.edu</a></td>
<td>805-452-1180</td>
</tr>
<tr>
<td>Maria Napoli</td>
<td>785 Laurel Walk # A</td>
<td><a href="mailto:napoli@engr.ucsb.edu">napoli@engr.ucsb.edu</a></td>
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<tr>
<td>Christopher Kuebel</td>
<td>785 Laurel Walk # A</td>
<td><a href="mailto:chriscs@cs.ucsb.edu">chriscs@cs.ucsb.edu</a></td>
<td>805-708-7506</td>
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<tr>
<td>Shane Luchauer</td>
<td>767 #A Cypress Walk</td>
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<td>Basak Halasagi</td>
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Petition Opposing the Opening of Phelps Road to Through Traffic

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<tr>
<td>Thomas Goodwin</td>
<td>525 Peppermint Ct</td>
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<tr>
<td>Remy Lethaby</td>
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<td>Richard Beck</td>
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<td>Aimee Jouett</td>
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<td>Guadalupe Sanchez</td>
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<td>Fam. Campero</td>
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<td>Marvin R. LeRoy</td>
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<tr>
<td>Kelly Hildner</td>
<td>6823 Silkberry Lane, Goleta</td>
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<tr>
<td>Adriana Kalendriano</td>
<td>6769 Sweetwater Way, Goleta 93117</td>
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Letter I-45
Petition on Phelps/Mesa Connection

6/01/08

Response to Comment I-45-1. Petition noted. All signees are referred to Master Response - Phelps/Mesa Connection.
Thanks for letting me speak today, I’m a resident of Storke Ranch which is a residential community in Goleta. And I am very concerned about the impacts of the proposed UCSB Long Range Development Plan on Goleta, and specifically on our neighborhood which is surrounded by UCSB property on three sides. One of our largest concerns is the proposed opening of our quiet cul de sac community road, Phelps Road, to through traffic, which is proposed as a traffic mitigation measure in the LRDP EIR. This proposed roadway connection would have significant impacts to traffic circulation, air quality, noise, and environmental justice, none of which were adequately analyzed in the EIR. We strongly feel that the Phelps/Mesa roadway connection should be eliminated from the EIR. Alternatively, the impacts of this roadway connection need to be analyzed in a recirculated environmental review document. The inadequacies of the EIR with respect to the Phelps/Mesa connection are outlined in a letter from our attorney, a copy of which I brought for you, I don’t know if I am allowed to give you papers. There are feasible alternative mitigation measures that could substantially lessen the plans’ environmental impacts and must be considered in a revised EIR. Rather than degrading existing neighborhoods by introducing campus traffic, UCSB should enhance public transit as a sustainable solution to its traffic problems. The University needs to consider such forward thinking solutions that provide an overall benefit to the community rather than rely on the backward thinking approach to transportation that is represented by the current EIR. I’m Kelly Hildner.

Good morning, my name is Susan Aguilera and I also live in Storke Ranch, and yes to everything Kelly just said. In addition, I have a concern about El Collejio (sp?), which it is my understanding that years ago when UCSB built apartments on El Collejio, they agreed to expand or widen the two lane area to four lane area between Storke and Los Coneros. They have not done so at this time, and we feel that that would be a great benefit as far as traffic flow is concerned. Again, instead of opening up Phelps Road to Mesa Road to Los Coneros, which is a huge concern. The proposed connection between Phelps and Mesa causes significant unavoidable environmental impacts. The easternmost portion of Phelps Road passes through a quiet residential community, Storke Ranch, ending in a cul de sac. The westernmost portion of Mesa Road passes through UCSB student family housing. The proposed connection of these road segments will vastly increase traffic volumes through these neighborhoods and increase congestion at the Phelps/Storke Ranch intersection as well as the Mesa/Los Coneros connection. The EIR must acknowledge these significant traffic circulation impacts. Further, the increased traffic volumes in this area may have significant air quality impacts, particularly considering the multiple sensitive receptor sites, including child care, recreational facilities located along Phelps Road. Thank you.

Good morning. My name is John Dickson. I represent “KeepPhelpsClosed.org.” Phelps Road is just off of Storke Road, about a mile from here. They are proposing to open it as part of the UCSB LRDP. Currently the number of cars that go down Phelps Road each day is 33. Under the LRDP they are planning to increase the number of cars per day on Phelps Road to 7000. This is a quiet little neighborhood, and 7000 cars if you line them up bumper to bumper would form a traffic jam from Storke Road all the way across Goleta, across Santa Barbara, across Summerland, all the way to Linden Avenue in Carpinteria. That is how much 7000 cars is, and they are planning to put 7000 cars per day on Phelps Road, a quiet cul de sac with children and day care centers. We encourage you to tell them to keep Phelps Road closed and keep the Storke Ranch neighborhood in tact. Thank you very much.
Letter I-46
Comments at UC Regents Meeting

6/16/08

Response to Comment I-46-1 (Hildner, K.). Please see Master Response - Phelps/Mesa Connection.

Response to Comment I-46-2 (Aguilera). Please see Master Response - Phelps/Mesa Connection. Regarding the widening of El Colegio, please see Response to Comment I-301.

Response to Comment I-46-3 (Dickson). Please see Master Response - Phelps/Mesa Connection.
Comments and Responses on Draft EIR - Organizations
June 23, 1008

University of California
Office of Planning and Design
C/o UCSB Vision 2025
Santa Barbara, CA 93106-1030

To Whom It May Concern,

Surfrider Santa Barbara chapter is the local chapter of the Surfrider Foundation, a 501(c) 3 nonprofit environmental organization dedicated to the protection and enjoyment of the world’s oceans, waves and beaches, for all people, through Conservation, Activism, Research and Education (C.A.R.E.). Our chapter has a long history of concern for the ocean and coast in Santa Barbara, and particularly in Isla Vista, and for maintaining public access to these valuable resources. Over the years we have opposed a number of UCSB’s development plans which were poorly conceived, showing little regard for their adverse impacts on the local environment. We are writing once again to express our serious concern that the UCSB Long Range Development Plan, as proposed, will have significant and unmitigable environmental impacts.

1. The Draft Environmental Impact Report greatly underestimates water use over the life of the Plan. This is a particularly egregious problem in light of decreasing water supplies throughout the state and in southern California in particular. We request a more detailed analysis of actual water availability, as well as better plans to reduce water consumption by UCSB. Every effort should be made to exclude water-thirsty plantings, especially lawns, and include drought tolerant and native landscaping to the fullest extent possible.

2. The DEIR significantly underestimates the adverse impacts that the anticipated increases in students, faculty and staff will have on parking in Isla Vista. The beaches in Isla Vista are a major local recreational resource, and maintaining parking and access to those beaches on behalf of the public has been a priority for Surfrider. Historically, the University has done little or nothing to ameliorate this problem, and we are greatly disappointed by the lack of creative planning in the DEIR regarding parking. We request that a much more extensive exploration of alternatives be developed, including greater restrictions on student use of cars, special stickers identifying student vehicles, more affordable off-campus long term parking facilities, and financial assistance to the county of Santa Barbara for parking violation monitoring and enforcement.

We are also concerned that the addition of 20 dedicated public-access parking spaces near Coal Oil Point will negatively impact the fragile coastal environment there, especially the snowy plover population and the restored sand dune area. We recognize that such concerns potentially conflict with our mission to protect public coastal access, but feel strongly that, in this instance, the health and stability of the marine ecosystems at Coal Oil Point are of greater importance than increased public access there.
Further, we are opposed to the construction of additional parking on the West Campus Bluffs (adjacent to Camino Majorca) because of the significant and unmitigable impacts it will have on the coastal environment, especially seasonal vernal pools, in this area.

3. Finally, we are concerned that the DEIR pays inadequate attention to adverse impacts on ocean water quality that will occur as a result of and during UCSB's planned expansion.

We appreciate the opportunity to comment on these matters, and your attention to this letter.

Sincerely,

[Signed]
Sandy Lejeune
Vice Chair
Surfrider Foundation
Santa Barbara Chapter
Response to Comment O-1-1. Please see Master Response - Water Supply, sections I, II, and IV. The RDEIR’s water supply analysis takes into account the water supply and demand projections contained in the 2008 WSA and calculates the additional demand associated with the buildout of the LRDP. For more detailed information about historical, present, and projected water supply numbers used in the RDEIR’s analysis, the commenter is referred to RDEIR Appendix 4.14-1, pages 4.14-4 to -21.

The University is aware of the water supply challenges in California and has been proactive about conserving water supplies. Please see responses to comments A-10-14, I-5-33, and I-5-32 for more information regarding University water conservation measures for drought years. Mitigation Measures W-3A through W-3G also require the University to install water saving devices (including, but not limited to shower heads, toilets, urinals, washing machines, and irrigation systems) in all buildings and facilities, implement a water conservation public awareness campaign, and use recycled water for new development to the maximum extent feasible. While approximately 90% of landscape irrigation on Campus uses recycled water (RDEIR at 4.14-24), drought-tolerant planting would still provide some conservation of potable water. Mitigation W-3H has therefore been added:

**LRDP Mitigation W-3H**

The University shall make use of drought tolerant species in campus landscaping.

Response to Comment O-1-2. The commenter states that the DEIR underestimates the impact the population increase would have on parking in Isla Vista, particularly for beach access. The commenter requests the consideration of several measures to lessen this impact, including the following: (1) greater restrictions on student use of cars, (2) special stickers for student vehicles, (3) affordable off-campus long term parking facilities, and (4) financial assistance to the County for monitoring and enforcement.

As stated in the discussion of Impact TRAFFIC-10, RDEIR Section 4.13, the University has attempted to assist in the reduction of parking problems in Isla Vista in the past:

*To eliminate UC Santa Barbara faculty, staff, and student parking in Isla Vista, a resident parking permit and enforcement program should be implemented in Isla Vista. Sections of on-street parking would be restricted to Isla Vista residents by providing permits to residents. The remaining on-street parking would be metered to avoid long-term parking by UC Santa Barbara faculty, staff, or students. Several years ago Santa Barbara County in cooperation with UC Santa Barbara proposed a parking permit program for Isla Vista. The program was not approved by the California Coastal Commission and it has not been resubmitted by the County. Because the parking permit program is outside the responsibility and jurisdiction of UC Santa Barbara, this impact is considered significant and unavoidable.*

The LRDP states on page E.8 that the University will continue to work with the County to address the parking problem. The LRDP also states on page E.8 that the University currently offers sufficient space to accommodate approximately 2,000 additional cars, but that University affiliates choose to use unrestricted parking in Isla Vista.

Regarding proposed restrictions on student car use, please see response to comment I-26-8B.
The commenter also states that designating 20 public access parking spaces near the Coal Oil Point Reserve, as well as additional parking on the West Campus Bluffs, will have a negative effect on coastal resources. As explained in response to comment I-44-27A, the proposed COPR parking spaces have been eliminated from the LRDP.

Moreover, the LRDP includes an extensive set of policies (ESH-1 through ESH-29) that address the management of sensitive resources and how the LRDP will be implemented so as to minimize impacts. Policies related to parking and coastal access listed on page E.11, including TRANS 5 and TRANS 10, address potential sensitive resource issues. The EIR further identifies Mitigation Measures BIO1A-G, which protect sensitive habitat areas.

Response to Comment O-1-3. The commenter cites concerns regarding impacts on ocean water quality. If a project involves one acre or more, the activity will be subject to the provisions of the NPDES permitting program as discussed in the discussion of Impact HYD-1, EIR Section 4.7. All projects constructed to implement the LRDP will be subject to additional environmental review at the time of proposal. As part of this review, projects will be reviewed for their consistency with LRDP policies, including erosion-control and fill policies (ERO-1 through ERO-2, and FII-1, and 2) to ensure minimal impact to water quality as the campus builds out. Also, the Transportation and Circulation section of the 2010 LRDP contains policies TRANS-9 through TRANS-11, which address sensitive habitat near parking areas. Individual projects also would be subject to mitigation measures identified in the EIR Section 4.3, which address indirect impacts to sensitive habitats including all aquatic habitats (see Impact BIO-1, RDEIR at 4.3-31).
June 20, 2008

University of California
Office of Campus Planning & Design
c/o Vision 2025
Santa Barbara, CA 93106-1030

To Whom It May Concern:

The Isla Vista Youth Projects has been providing programming and services to the community of Isla Vista since 1971. We enjoy a positive relationship with UCSB and appreciate the many ways we work together to better serve Isla Vista residents. We provide programming to student and staff families and serve as a site for student volunteers, pre-professional interns and part-time employment. We receive funding through IVCRC from student fees, appreciate UCSB staff who serve in a leadership capacity on our Board of Directors and are thankful for the many in-kind contributions we receive from the University.

Because of our close working relationship with UCSB, we feel it is both our responsibility and privilege to provide comments to the recently released Long Range Development Plan and Environmental Impact Report where there is potential impact on the quality of programs for the children and families who live in Isla Vista. Two concerns surface:

In general, we are disappointed not to find discussion or proposed measures to mitigate the impact the proposed growth in students, staff and faculty on schools, child care and other social services in Isla Vista / Goleta. Isla Vista is in an unincorporated section of our county and is extremely underserved. Any new growth in population will strain an already under-funded, over-utilized patchwork of services.

And, specifically, we are extremely concerned about the proposal to extend Phelps Road as an alternate route to the campus. The projected increased traffic on Phelps Road through this quiet residential neighborhood will greatly impact one of our program sites, the Isla Vista Children’s Center. The Children’s Center is located on the left side of Phelps Road (heading east), and is separated from the road only by a bike path and sidewalk. We are concerned about the health implications on the youngest, most vulnerable population: babies, toddlers and preschoolers. The increase in pollution from vehicles, noise levels and particulate matter from tires will directly impact over 100 children who use the outdoor play space every day. As well, the increased vehicle traffic will have a corresponding increase in the possibility of injury accidents to parents and children as they walk to and from Isla Vista or the bus stop on Storke Rd. The complete absence of any mitigating measures such as stop lights, traffic calming devices, vegetative and cement sound barriers is particularly disturbing. We urge UCSB to find a better solution to campus access--one that will not impact the lives of the children and families at the Center as well as the residents of Storke Ranch.

Sincerely,

[Signature]

LuAnn Miller
Executive Director
Response to Comment O-2-1. The commenter mentions not finding a discussion or any mitigation measures for the impact of the 2010 LRDP impacts to schools, child care and other social services. The discussion of Impact PUB-4, EIR Section 4.11 (p. 4.11-20), addresses impacts to public schools. The EIR found that while the LRDP would generate more students who would attend area public schools, the increase in the number of students would not create a significant impact. This is due to an ongoing district-wide enrollment decline for the Goleta Union School District and the availability of additional enrollment in the Santa Barbara High School District, Goleta Valley Junior High and Dos Pueblos High School. Despite the enrollment decline on the Goleta Union School District, however, the University will negotiate with the District to possibly expand the Isla Vista Elementary School on University land. There is no substantial evidence that the LRDP would have a significant adverse physical effect on any other public education services. Please also see Master Response – Fiscal Impacts.

Response to Comment O-2-2. Please see Master Response – Phelps/Mesa Connection.
June 16, 2008

University of California
Office of Campus Planning & Design
c/o Vision 2025
Santa Barbara, CA 93106-1030

To Whom It May Concern:

The Family Council of Isla Vista Children’s Center is an organization of parents who have their children enrolled in the Center. The function of the Family Council is to provide support and assist to the Center staff in developing activities for the families. The Council also listens to community concerns as they may affect the quality of programs for the children.

The proposal to extend Phelps Road through to the UCSB campus was brought to the attention of the Council during our May meeting. Several members of the Family Council attended the hearing on June 4th. During the June meeting the Council reviewed the issues regarding the extension and how it might affect the children attending the Center. The concerns are as follows:

1. Increased traffic flow on Phelps Road will increase the toxicity that the children will be exposed to;

2. Many of the families who come to the Center walk from the bus stop on Storke Road or from their homes; increased vehicle traffic will increase the possibility of injury accidents.

The Family Council urges UCSB to consider alternatives that will not affect the lives of the children and families at the Center. One of the suggestions offered at the meeting was to limit the use of the extension of Phelps Road to emergency vehicles, buses and pedestrian traffic.

Also if the plan is approved to extend Phelps Road the Family Council would like UCSB to install a solid barrier between Phelps Road and the Children’s Center.

The families at the Children’s Center appreciate the positive relationship that the Center maintains with the University and hope that we can continue to work together for the good of the community.

Sincerely;

see attached list

6842 Phelps Rd, Goleta California 93117-4499
Telephone (805) 968-0488 Fax (805) 968-1771
On behalf of the Isla Vista Children’s Center Family Council everyone that has signed below agrees with the attached letter.

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On behalf of the Isla Vista Children’s Center Family Council everyone that has signed below agrees with the attached letter.

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Letter O-3
Listed Petitioners
Isla Vista Children's Center Family Council

June 16, 2008

Response to Comment O-3-1. The commenter states that the increase in traffic flow on Phelps Road would increase the “toxicity that children will be exposed to.”

Please see Master Response - Phelps/Mesa Connection regarding air quality impacts along Phelps Road.

Response to Comment O-3-2. Please see Master Response - Phelps/Mesa Connection.
June 17, 2008

To: University of California, Santa Barbara  
Office of Campus Planning & Design  
c/o Vision2025  
Santa Barbara, CA 93106-1030

Fr: UCSB Staff Housing Work Group

Representing: Staff Assembly, Chancellor’s Staff Advisory Council (CSAC), Academic  
Business Officers Group (ABOG), Professional Women’s Association (PWA)

Re: Comments on staff housing for the Long Range Development Plan (LRDP)

For over a year, an unprecedented collaboration of UCSB staff representatives from the Staff  
Assembly, Chancellor’s Staff Advisory Council, the Academic Business Officers Group, and the  
Professional Women’s Association have been meeting regularly to solicit feedback from UCSB  
staff at large on the topic of affordable housing for staff. In conjunction with the Chancellor’s  
Faculty/Staff Housing Committee, we have worked with Institutional Research to administer  
another campus-wide housing survey. Additionally, we have also participated in numerous  
campus town halls with the intent of ensuring that the feedback from UCSB staff is considered  
on this critical topic.

The housing plans contained in Vision 2025 are far-sighted in that, for the first time, staff  
housing is actually under consideration. It is our goal to collaborate with campus officials to  
bring this housing to fruition. UCSB can and should take a leadership position in the community  
in this regard.

However, we are very concerned that the plans for staff housing may not materialize due to the  
highest priority being placed on the provision of additional faculty housing, escalating costs of  
construction, and the stark possibility that water may not be available to serve such projects.

We strongly recommend that realistic goals be established with clear timelines for the provision  
of staff housing which are linked to increases in assignable square footage and increases in  
student enrollment. In actuality, housing for staff is needed now, even without any proposed  
increases in campus facilities, students, faculty, or staff.

The feedback we have collected across campus from UCSB staff reveals a compelling need for  
staff housing which will serve to positively affect retention and to reduce stressful and costly  
long distance commutes. By the end of July we hope to have the results from the most recent  
campus housing survey and will incorporate that information into our response to the Final EIR.

Affordable housing for staff can mitigate many of the concerns that the local community has  
regarding the significant amount of new growth proposed by UCSB.

Please take full advantage of this tremendous opportunity to support the staff of UCSB, to  
provide leadership, and to convince the local community that Vision 2025 is a positive  
development for all.
Letter O-4
UCSB Staff Housing Work Group

June 17, 2008

Response to Comment O-4-1. The LRDP does not place a higher priority on the creation of faculty housing over the creation of staff housing. Rather, housing is programmed to be flexible to meet varying market demand forces.

The availability of water supplies for the 2010 LRDP, including staff housing, is addressed in RDEIR Section 4.14, which concludes that sufficient water is available to meet all LRDP demand, including staff housing. In addition, please see Master Response – Water Supply.

The temporary shortages of housing due to the timing required to develop new housing development is discussed in Section 4.10 of the RDEIR, in particular in the discussion of Impact POP-2. The EIR identifies several mitigation measures to address this temporary but significant and unavoidable impact. Please see response to comment A-12-1 for more information.
June 18, 2008

University of California
Office of Campus Planning & Design
c/o UCSB Vision 2025
Santa Barbara, CA 93016-1030

Re: UCSB Long Range Development Plan

On behalf of the Coastal Housing Coalition, I am writing to express our organization’s support for the University’s Long Range Development Plan (LRDP), “Vision 2025”, and in particular, the University’s commitment to provide housing for its faculty and staff.

The Coastal Housing Coalition, supported by 60 local companies who collectively employ 45,000 workers, is dedicated to finding solutions to the South Coast’s critical housing shortage. We believe that our community’s economic, social and environmental health depends on there being an adequate and affordable supply of housing for our local workforce.

To that end, we appreciate the University’s plan to provide much needed housing for your faculty and staff – our area’s long term residents – in close proximity to campus. The plan to build almost 1,900 new housing units for faculty and staff represents a significant increase from the 65 faculty units currently available and 161 soon-to-be-built units approved as part of the last LRDP. Additionally, housing the forecasted net increase of students on University property will put less of a strain on existing South Coast housing, making it more available for non-UCSB workers.

We believe particularly important components of the plan are that the proposed housing units for faculty and staff will include a variety of housing types designed to be affordable to a diverse mix of workers, both as renters and home owners, and that University for-sale housing will be resale price restricted resulting in permanent affordability. We do, however, urge you to ensure the housing is built and available as each added increment of enrollment occurs, rather than within a four year window as is currently proposed.

In addition to the goal of housing students, faculty and staff, we are pleased to see that you have made the integration of sustainable practices an explicit objective of the LRDP. The Coastal Housing Coalition does not support all residential development projects; instead, we encourage development that makes the most efficient and effective use of the limited land within our existing urban boundaries, and encourages environmental sustainability through compact, transit and pedestrian...
oriented development. A critical component of sustainability is minimizing worker commuting by locating housing near jobs. The University is in a unique position to promote this goal given the amount of land it controls and its constitutional immunity from local land use regulation.

Again, the proposed residential developments for the new faculty and staff positions created as part of the growth described in the LRDP will go a long way to housing a higher percentage of the University’s workforce than are currently accommodated on campus. But we also encourage you to use this housing where possible – and to look for additional ways to provide housing – both for existing faculty and staff not currently housed on campus, as well as the significant numbers of recruitments you will need to replace retiring positions. While we understand the University can’t build units for every member of its workforce, we strongly encourage you to maximize the affordable workforce housing created for your employees.

To that end in the Long Range Development Plan, and consistent with your stated objectives of housing and sustainability, we encourage you to look at increasing the density of some of the planned residential developments. Specifically, we encourage you to consider some attached housing, potentially duplexes, in the Devereux developments, as well as potentially adding another 5 feet to those apartment projects currently proposed at 40 feet to allow for an additional story and more units.

Finally, we applaud you for looking for alternate ways of helping your employees achieve home ownership, including your loan program and partnership with Willow Springs, and hope that you will continue to support creative programs that help get interested employees into home buying opportunities.

We appreciate the opportunity to comment on the University’s Long Range Development Plan. The University is not simply an educational institution, but is a cornerstone of our community’s economy, culture and civic life. We appreciate the leadership you are demonstrating in providing critical workforce housing for your employees, and hope that you will continue to make that a central part of your plans.

Sincerely,

Debra Cox Bultan
Executive Director
Response to Comment O-5-1. Please see response to comment A-12-1.

Response to Comment O-5-2. For long-range planning purposes, the 2010 LRDP would accommodate 1,874 new units for faculty and staff members. Because the LRDP will increase faculty and staff by approximately 1,700, this would make 174 units available for existing faculty and staff who are not living on campus or for the replacements of retirees.

Response to Comment O-5-3. The commenter’s request for the University to consider increasing the density of some of the LRDP residential developments is noted. The current, proposed densities are considered a reasonable balance of sustainability, aesthetics and avoidance or minimization of environmental impacts.
23 June 2008

University of California
Office of Campus Planning & Design
c/o Vision2025
Santa Barbara, CA 93106-1030

Sent via email to: info@UCSBVision2025.com

Re: UCSB Long Range Development Plan (LRDP) Draft EIR

To Whom It May Concern:

The Citizens Planning Association of Santa Barbara County (CPA) is a 48-year-old countywide grassroots organization dedicated to sound community planning, environmental protection, and preserving our area’s quality of life. With that in mind, CPA’s South County Land Use Committee (LUC) appreciates this opportunity to provide you with the following input regarding the Draft Environmental Impact Report (DEIR) for UCSB’s Vision2025 Long Range Development Plan (LRDP).

In reviewing the DEIR, CPA’s LUC had a number of concerns, but decided to focus on the following four areas:

1. **CONCURRANCY OF INCREASE IN HOUSING AND ENROLLMENT**

   **Housing**: While the LRDP includes a plan for housing to accommodate student, faculty and staff increases, there is no guarantee that housing would be built concurrently with these increases or that funding would be available. The LRDP envisions housing within a mile of campus for the increased population, but there is nothing to require that it be built concurrently. Without this guarantee, there could be significant impacts on traffic and off-campus housing in adjacent communities. The DEIR needs to be revised to reflect this scenario.

   **Enrollment** (see DEIR 3.0-19): It appears that the University has exceeded its current enrollment cap by about 1,000 students. The impact analysis section needs to address whether the new cap of 25,000 is mandatory or if it can be exceeded by any factor. If the latter, additional impacts and mitigations would be required.

   **Population** (see DEIR 4.10): The population increases do not factor in the families of married students and faculty and staff. This needs to be identified and impacts mitigated. This also depends on new construction keeping pace with these population increases.
The multiplier effect of UCSB increases on surrounding areas in terms of local businesses etc. serving the new population also needs to be analyzed and impacts identified and mitigated.

2. TRAFFIC

The traffic model used shows discrepancies from past modeling by the City of Goleta and shows many fewer trips generated. The City of Goleta only recently received information from UCSB regarding its model and further analysis is warranted to resolve these discrepancies.

While a number of intersections were analyzed, others that would be impacted were not covered in the DEIR. They include Storke/Marketplace Drive; Los Carneros/Calle Koral; Fairview/Calle Real; Patterson/Highway/101 north-bound on-ramp; Patterson/101 south-bound ramp.

Alternative strategies to mitigate traffic impacts could include prohibiting underclassmen from having cars on campus; increased shuttle service in lieu of opening Phelps Road; and encouragement of commuters using buses or van pools.

3. WATER

(See DEIR 4.14-1.) The Goleta Water District’s 2005 Urban Water Management Plan indicates that full build out of land use plans within the Water District would use almost the entire available water. The 2005 plan did not include the 2025 LRDP or any potential agricultural conversions within the district boundaries. The LRDP acknowledges that water supply is insufficient to complete the plan. It claims that it will attempt to purchase additional State Water from other jurisdictions. But State Water is not a reliable source. Early melting of the Sierra snow pack and environmental rulings to protect the Delta could significantly reduce this supply. A reduced project may be a necessary mitigation.

4. NEIGHBORHOOD COMMERCIAL

The plan calls for 124,000 square feet of neighborhood commercial within the new housing complexes. While this may reduce some traffic impacts if people shop close to home, there may be increased impacts from traffic coming in from outside. The amount of square footage seems high for this project.

We appreciate your serious consideration of these comments and look forward to reading your response to them.

Sincerely,

Naomi Kovacs
Executive Director
Letter O-6
Naomi Kovacs, Executive Director
Citizens Planning Association of Santa Barbara County, Inc.

June 23, 2008

Response to Comment O-6-1. A. Please see response to comment A-12-1.

B. Please see response to comment A-17-PD-4 regarding enrollment capacity, and I-42-27A for the reasons for growth.

C. The DEIR takes into account the families of students with spouses or partners and those of faculty and staff (p. 4.10-5, 4.10-27; p. 4.11-19). The LRDP’s housing program uses bedspaces to address undergraduate students and housing units to address graduate students, students with spouses or partners, and faculty and staff members (see Table 3.0-9 in DEIR).

D. Indirect population increases associated with the LRDP are addressed under Cumulative Impacts in EIR Section 4.10 (p. 4.10-33).

Response to Comment O-6-2. A. The Transportation Section (4.13) was recirculated in response to comments from the Draft EIR publication. Please see the discussion beginning on page 4.13-67.

B. The mentioned intersections were included in the recirculated Transportation Section. Please see page 4.13-5.

C. Please see response to comments A-12-48 and A-13.

Response to Comment O-6-3: The RDEIR concludes that Goleta Water District will have sufficient water to meet demand related to development under the 2010 LRDP along with other growth in the service area. The RDEIR identifies purchase of SWP supplies as mitigation for the LRDP’s potential impact on water supply should the District’s supplies be insufficient. For a more detailed discussion of the RDEIR’s conclusions, please see Master Response - Water Supply, section II. Regarding the reliability of State Water Project deliveries, please see Master Response - Water Supply, section IV.B.

Response to Comment O-6-4. Please see response to comment A-4-13.
We are very pleased that UCSB is aware of the environmental and health benefits of bicycling to and within the campus. The importance of sustainable transportation is vital for the future of us all, and we appreciate that bicycling is favorably mentioned in the Long Range Development Plan.

For the Draft Environmental Impact Report, we have two areas of concern:

(1) Energy experts agree that the age of cheap gas is gone forever. It will cost more to travel by motorized vehicles than in the past. Reports from the Federal Highway Administration state that Americans have curtailed driving by 2% in the first four months of 2008 compared to 2007, reversing the long-time trend of increase. A survey of Santa Barbara intersections that we performed earlier this month showed a 14% increase of bicyclists over the historic average since 2000. Transit use is likewise increasing. People are changing how they get around.

We appreciate that the LRDP is planning to house new students, staff and faculty on University land. It will doubtlessly encourage a majority to bike, walk and use transit to access the campus—and many of those will likely consider those alternative modes for other trips as well. The University’s increasing emphasis on sustainability will further encourage responsible travel.

In consideration of the above, we are concerned that the estimates of increased motorized trips generated by the added residents are no longer reasonable. The same for the many mitigations for those trips that recommend measures to benefit motorists, sometimes to the detriment of pedestrians and bicyclists.

(2) The proposed changes to Ocean Road are sweeping. They will add 500 new residential units and will mix motorists, bicyclists and pedestrians on the roadway. Safe management of this mix is not discussed in the DEIR. Bicyclists and pedestrians will be entering campus from all Isla Vista streets, then (with the exception of Pardall) will turn left or right on Ocean Road, before turning again onto campus bikepaths and walkways. Our suggestion for safe management is to make motorists “invited guests” who will move at a bicycle pace. This might be accomplished by enforcement of speed limits, or through design features. Street design was first pioneered in the Netherlands to slow motorists. Other countries—Germany, England, Sweden, Denmark, France, Japan, and Israel—have followed. We hope that as Ocean Road is designed, features will be incorporated to safely mix the various modes.

Thank you for considering these ideas to make a better, more sustainable UCSB.

Respectfully yours,

Ralph Fertig, President
Santa Barbara Bicycle Coalition
Letter O-7
Ralph Fertig, President
Santa Barbara Bicycle Coalition

June 23, 2008

Response to Comment O-7-1. The traffic analysis presented in the EIR is based on a conservative (i.e., high) estimate of vehicular traffic. This is to ensure that the magnitude of potential impact due to buildout of the LRDP is not understated. Any changes in driving patterns, among other factors, will be considered as part of the environmental review for specific projects implementing the 2010 LRDP.

Response to Comment O-7-2. Safety considerations are part of any roadway’s capacity determination and are built into the Transportation and Circulation section’s analysis of level-of-service impacts. Please see response to comment I-44-8A for more information on bicycle safety on Ocean Road. Potential conflicts between motorists and non-motorists and mitigation of this potential impact is addressed in the discussion of Impact TRAFFIC-7 (p. 4.13-156). Ocean Road is included in this analysis.

The suggestion to slow vehicular traffic to the speed of bicyclists is noted. As stated on RDEIR page 4.13-157, a detailed bicycle design study will prepared to ensure improvements incorporate design features that provide safe and adequate circulation. If slowing vehicular traffic is a feasible and required means to do so, that measure will be considered at the time the project is proposed.
June 20, 2008

University of California
Office of Campus Planning & Design
c/o UCSB Vision 2025
Santa Barbara, CA 93106-1030
Via email: info@UCSBVision2025.com

Re: UC Santa Barbara Long-Range Development Plan Draft Environmental Impact Report

To Whom It May Concern:

Please accept the following comments on the Draft Environmental Impact Report (DEIR) for the proposed 2008 Long-Range Development Plan (LRDP) for the University of California, Santa Barbara (UCSB), which are hereby submitted by Santa Barbara Channelkeeper. Santa Barbara Channelkeeper is a local non-profit organization dedicated to protecting and restoring the Santa Barbara Channel and its watersheds. We focus our comments the hydrology and water quality impacts of the proposed project as this is where our expertise lies.

**LRDP Impact HYD-2**

As noted in the DEIR, implementation of the LRDP would involve major construction throughout much of UCSB property, and runoff from construction sites has the potential to adversely affect water quality and may hinder achievement of water quality standards in area waterways. Channelkeeper notes that the proposed Mitigation HYD-1A, to prepare at a later date Storm Water Pollution Prevention Plans to address known pollutants of concern on campus, is insufficient to justify the assertion that the impact will be reduced to a less than significant level.

Construction sites are significant sources of stormwater pollution. As stormwater runs over a construction site, it can pick up and transport enormous loads of sediment and soil via storm drains to local waterways, which can smother and kill aquatic life. Sediment also absorbs and carries other toxins, such as oil, grease, degreasers, paint and other construction site chemicals, which impair water quality and can harm and kill fish and terrestrial animals drinking the water.

The University will need to do far more than simply limiting or prohibiting the application of copper and other decorative finishes and limiting or eliminating sandblasting and pressure...
washing where copper or zinc finishes are present (Mitigation HYD-1A) to ensure that construction does not impair water quality and cause violations of water quality standards in local waterbodies. The EIR must include mitigation that explicitly commits the University and its contractors to implementing and enforcing the following:

- Requirements for construction site operators to implement appropriate erosion and sediment control BMPs;
- Requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality;
- Procedures for site plan review which incorporate consideration of potential water quality impacts;
- Procedures for receipt and consideration of information submitted by the public; and
- Procedures for site inspection and enforcement of control measures.

These measures are required by the State General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (General Permit) in order to reduce pollutants in stormwater runoff from construction activities.

**LRDP Impacts HYD-2, HYD-3 and HYD-4**

As noted in the DEIR, the LRDP will result in a major increase in impervious surfaces, therefore causing a substantial increase in the volume and velocity of stormwater runoff. This in turn will increase the load of pollutants transported to nearby waterbodies, many of which are already impaired by metals, nutrients, pesticides and pathogens. It will also alter infiltration and groundwater recharge patterns and cause erosion and flooding.

Channelkeeper does not find that the proposed mitigation measures will be sufficient to mitigate these impacts to a less than significant level. The LRDP states on page 4.7-31 that “Potential storm water quality impacts to receiving waters, including the ocean, can be minimized by complying with requirements for post-construction stormwater controls in SWPPPs for specific projects, and by continuing to provide CDS [Continuous Deflective Separation] or similar technologies to treat runoff from drainage subareas prior to discharge.” Channelkeeper finds these measures to be impossibly vague, and the proposed mitigation - to remove sediments, treat runoff and increase the sizing of storm sewer pipes – to be outdated and reactive rather than state-of-the-art and proactive. Conveying runoff as quickly as possible to the nearest storm drain and treating large volumes of runoff at the end of the pipe are no longer the favored and most effective means of addressing the increases in volume, velocity and pollutant loads of stormwater that result from development.

In the past decade, a stormwater management technique called Low Impact Development (LID) has gained ground as the preferred method for mitigating stormwater impacts. Channelkeeper emphasizes that the University has an incredible opportunity with implementation of the LRDP to become a leader in the use of LID strategies to proactively address the substantial hydrology and water quality impacts of the LRDP.
LID is an innovative stormwater management strategy that seeks to mitigate the impacts of increased runoff and stormwater pollution. LID comprises a set of site design approaches and small-scale stormwater management practices that promote the use of natural systems for infiltration, evapotranspiration and reuse of rainwater. LID minimizes hardscape and uses the pervious surfaces on a development site, such as landscaped areas, to infiltrate and/or temporarily store runoff, allowing the site to more closely mimic a natural state with respect to hydrology. LID site design incorporates diverse practices such as bioswales, filter strips, flow-through planter boxes, porous pavement, cisterns, rain barrels, green roofs, and other micro-scale best management practices, allowing a great deal of flexibility in design. LID techniques can effectively remove nutrients, pathogens and metals from stormwater and reduce the volume and intensity of stormwater flows.

LID has multiple benefits beyond just improving water quality; it also recharges groundwater, reduces flooding, preserves stream and riparian habitats, improves community aesthetics, and saves money. LID has been applied to government, residential, and commercial development and redevelopment projects and has proven to be a cost-efficient and effective method for managing runoff and protecting the environment.

Channelkeeper strongly urges the University to take advantage of the opportunity presented by the major changes to UCSB property envisioned in the 2008 LRDP by implementing innovative LID strategies campus-wide. LID is now widely accepted as the most effective means of reducing the runoff and stormwater pollution impacts of new development and redevelopment, and the University ought to extend its laudable commitment to sustainability into the field of stormwater management by implementing cutting edge LID techniques into all aspects of the LRDP.

The 2008 LRDP will be subject to the post-construction runoff control measures of the General Permit, which must be spelled out in a Storm Water Management Program (SWMP) approved by the Central Coast Regional Water Quality Control Board (RWQCB). Channelkeeper notes that UCSB’s SWMP has not yet been adopted, contrary to this assertion on page 4.7-25, but is awaiting review and approval by the RWQCB, likely by October 2008. Channelkeeper has reviewed the draft SWMP submitted by UCSB to the RWQCB in June 2008, and unfortunately, we note that it fails to satisfy new requirements imposed by the RWQCB in February of this year relating to the implementation of interim hydromodification control standards, as follows:

- For new and re-development projects, Effective Impervious Area\(^2\) shall be maintained at less than five percent (5%) of total project area.
- For new and redevelopment projects that create and/or replace 5,000 square feet or more of impervious surface, the post-construction runoff hydrographs shall match within one percent (1%) the pre-construction\(^3\) runoff hydrographs, for a range of events with return periods from 1-year to 10-years.
- For projects whose disturbed project area exceeds two acres, preserve the pre-construction drainage density (miles of stream length per square mile of watershed) for all drainage areas serving a first order stream\(^4\) or larger, and ensure that post-project time of concentration is equal or greater than pre-project time of concentration.
These interim measures must be implemented within six months of UCSB’s enrollment in the General Permit (likely by April 2009). It is likely that the RWQCB will require UCSB to modify its SWMP to comply with these requirements. If that is the case, the LRDP will need to be modified to ensure that all LRDP-related projects will satisfy these more rigorous requirements.

Channelkeeper does note, however, that the draft SWMP states that the University will encourage the inclusion of LID concepts into the design of all campus projects as interim measures, which we strongly support. We don’t find that the EIR as currently drafted fulfills this SWMP commitment, however, and again urge that the mitigation measures explicitly commit to doing so.

Thank you for the opportunity to comment on the DEIR for UCSB's 2008 LRDP. We applaud the University’s commitment to sustainability and environmental protection, and hope it will extend this commitment into the realm of stormwater management by integrating cutting edge LID strategies into all LRDP-related projects. Please do not hesitate to contact me should you have any questions regarding the above comments.

Sincerely,

Kira Redmond
Executive Director
Response to Comment O-8-1. The commenter states that preparation of SWPPPs at a “later date” is insufficient to address construction-related impacts to water quality, and that the list of measures given under Impact HYD-1A is too limited.

SWPPPs are site- and project-specific and are completed at the time of project proposal pursuant to the requirements of the NPDES program. The EIR provides information about measures that have been applied successfully in the past (refer to the discussion under Impact HYD-1), as well as information on the means of complying with existing regulations, including the adopted SWMP for the campus (discussion, Impact HYD-1). The potential impacts of and appropriate mitigation for specific projects will be determined at the time of project proposal.

As stated in Mitigation HYD-1A, the mitigation is not limited to the specific measures listed. As mentioned previously, the discussion following Impact HYD-1 outlines examples of SWPPP contents that have been successfully implemented in the past. The commenter suggests the following measures:

- Requirements for construction site operators to implement appropriate erosion and sediment control BMPs
- Requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site
- Procedures for site plan review which incorporate consideration of potential water quality impacts
- Procedures for receipt and consideration of information submitted by the public
- Procedures for site inspection and enforcement of control measures

The above measures are standard contents of SWPPPs, and would be required to be included in any SWPPP prepared during implementation of the LRDP. This is stated in the EIR in the discussion following Impact HYD-1, EIR Section 4.7.

In addition to the above requirements for individual projects, the LRDP contains an extensive list of policies to minimize impacts to water quality (ERO-1 through 16, and FIL-1, 2), with which compliance will need to be demonstrated as a condition of approval for subsequent individual LRDP projects.

Response to Comment O-8-2. The commenter states that the mitigation measures identified to address Impacts HYD-2, HYD-3, and HYD-4 are too vague. Mitigation Measures HYD-2A and HYD-2B are program-level measures. Additional, project-level measures may be identified at the time of approval of specific LRDP projects. Also, as discussed in Impact HYD-1 (DEIR p. 4.7-26), the SWPPPs will likely include such measures as avoidance of disrupting natural channels, retaining sediment on-site, and storm drainage protection, among others. If avoidance and minimization of impacts to hydrological resources and water quality require LID-based techniques, the SWPPPs will be required to include such measures. In line with this, Mitigation Measure HYD-2a has been changed as follows:

LRDP Mitigation HYD-2A: The University shall install and maintain technologies effective at removing sediments and otherwise treating runoff, including Continuous Deflective Separation devices or similar technologies and methods, such as Low Impact Development
techniques. Technologies selected shall reduce particulate matter. The improvements shall be implemented concurrently with the construction of individual projects.

As stated in the DEIR (p. 4.7-33), “with the implementation of existing regulatory requirements, LRDP polices, and proposed mitigation measures HYD-2A and HYD-2B, development proposed by the 2010 LRDP would not result in a substantial additional source of polluted runoff.”

Response to Comment O-8-3. As acknowledged by the commenter, “the 2010 LRDP will be subject to the post-construction runoff control measures of the General Permit, which must be spelled out in a Storm Water management Plan (SWMP) approved by the Central Coast Regional Water Quality Control Board (RWQCB).” Because the proposed 2010 LRDP is a long-range plan, and does not authorize construction of any specific building component prior to completion of project-specific environmental review, all regulations will apply at the time those specific project move forward with environmental permitting. To this end, the current SWMP (2003) states the following: “Whenever UC Santa Barbara staff or contractors perform work at UC Santa Barbara, procedures outlined for each relevant BMP, or other proven technique that reaches the same goal, must be used in order to ensure compliance with storm water discharge regulations.”

UCSB’s SWMP was approved by the RWQCB and made final in June of 2009. In November of 2009, the University signed a declaration to participate in the Central Coast Joint Effort for developing hydromodification. Section 4.7 of the 2010 LRDP will be revised to reflect this updated information.
UCSB Vision2025

From: UCSB Vision2025 [info@ucsbvision2025.com]
Sent: Monday, June 23, 2008 4:07 PM
To: j_dugan@lifesci.ucsb.edu
Subject: RE: 2008 Draft LRDP comments

Thank you for your correspondence on UCSB's Long Range Development Plan (LRDP). Your comments will be forwarded to the team preparing the LRDP and EIR.

Maggie Cox
~On behalf of the LRDP planning committee

From: j_dugan@lifesci.ucsb.edu [mailto:j_dugan@lifesci.ucsb.edu]
Sent: Monday, June 23, 2008 2:59 PM
To: info@UCSBVision2025.com
Subject: 2008 Draft LRDP comments

June 22, 2008

University of California
Office of Campus Planning and Design c/o UCSB Vision 2025
University of California
Santa Barbara, CA 93106-1030

Dear Sirs and Madams,

Thank you for the opportunity to provide comments on the UCSB 2008 Draft LRDP and EIR. I would like to comment on two elements of the plans: 1) the proposed new West Campus Bluffs beach access staircase and 2) any "optional" new parking lot/spaces proposed for the West Campus Bluffs on Camino Majorca (see Draft LRDP Section E-9). I am a coastal ecologist by profession and also live in Isla Vista adjacent to the West Campus Bluffs where a new beach staircase and "optional" new parking lot/spaces are proposed in the draft LRDP and DEIR.

6/23/2008
I am concerned with the ecological impacts of any LRDP actions that will result in increased public access to the beach (defined in the DEIR as West Campus Beach) reached via the Camino Majorca area. The proposed new beach staircase at the historic Campbell beach house (jailhouse) is of particular concern as an ecological impact. Our studies, including over 13 years of bird counts on the West Campus Beach have documented that this beach is a major foraging ground for wintering shorebirds (see Hubbard and Dugan 2003, paper attached). Most populations of migrant shorebirds around the world are in serious decline, suggesting that vital condition-dependent rates such as fecundity and annual survival are being negatively affected globally. The West Campus beach between the Camino Majorca staircase and Coal Oil Point supports very high diversity (26 species) and some of the highest average numbers of shorebirds (99 birds/km year-round) ever reported for an exposed sandy beach anywhere in the world. This stretch of beach provides shorebirds with a much-needed feeding refuge during winter high tides in combination with rich and readily available beach invertebrate prey. The beach directly in front of the Campbell Ranch beach house is particularly important as a foraging refuge during high tides while access is limited from the Camino Majorca staircase, where birds can feed with lower levels of human and dog disturbance. Enhancing human access and use of this beach via a new staircase and increased parking will result in increased disturbance to shorebirds that could significantly decrease their survival and ability to reproduce successfully. This significant environmental impact to beach shorebirds is not addressed in the draft DEIR or the LRDP with respect to the proposed new staircase or the enhancement of public beach access. In addition, hundreds of native wetland plants currently grow along the paths on the west side of the eucalyptus row bordering Camino Majorca. The lack of information on this habitat suggests the wetland delineation conducted for the DEIR was insufficient for the West Campus Bluffs.
As an ecologist, the conversion and development of any of the few remaining undeveloped coastal bluff lands in the region constitutes an extremely significant impact that cannot be justified or offset by mitigation or other measures. Our remaining coastal bluff land is far too scarce, fragmented and precious to be used for parking or other unnecessary developments. Although not detailed sufficiently in the DEIR or draft LRDP to evaluate, any variation on a new parking lot or spaces on the West Campus Bluffs near Camino Majorca could have adverse impacts on the ecology of the bluffs, beach and coastal zone, and the increased traffic, noise, and air pollution would degrade the quality of life for local residents, including my family. Isla Vista is a very densely populated area with few sidewalks or paths for pedestrians. Camino Majorca and the major cross streets of Isla Vista are heavily used by an alarming mix of cars, pedestrians, skateboarders, and bicyclists. Most of the street intersections are blind and uncontrolled in west Isla Vista, including all of the intersections of major cross streets (Del Playa, Trigo, Sabado Tarde and Pasado) with Camino Majorca and Camino Lindo. Increased traffic from enhanced use or a new circulation pattern associated with any new parking lot or spaces for the West Campus Bluffs will greatly increase the traffic hazards of the area to all users and residents, including walkers, runners, skateboarders, bicyclists and equestrians. These significant impacts to traffic, traffic speeds, recreation, noise, quality of life and pollution are not considered or addressed in the DEIR or draft LRDP.

As a 16 year resident of the only remaining neighborhood of single family homes in Isla Vista, any new parking lot on the West Campus Bluffs will negatively impact and significantly degrade my quality of life and that of my neighbors. These negative impacts include 1) greatly increased, unsafe, uncontrolled, speeding traffic by our homes, seriously endangering children, visitors, and pets, 2) significantly increased noise and disturbance by cars and beachgoers,

6/23/2008
3) increased air pollution, trash and dirt in our yards and homes 4) loss of views across currently open space, 5) increased crime and burglary in our neighborhood, and 6) loss of the quiet family atmosphere of a neighborhood where children and residents can play in the street. None of these impacts are considered or addressed in the DEIR or draft LRDP.

The open spaces of the West Campus, West Campus Bluffs and West Campus beach and the single family homes of West Isla Vista provide a much needed tranquil haven for wildlife and humans from the overcrowding and poorly planned residential housing, traffic and parking found in the majority of Isla Vista. Please preserve this environmental and residential refuge by reducing traffic, providing transportation alternatives, using existing parking lots and beach access points and by removing the proposed new beach access staircase on the West Campus Bluffs and any variation on a new parking lot or spaces on Camino Majorca from plans for this area in the draft 2008 DEIR and LRDP.

Thank you for your consideration of my comments.

Sincerely,

Jenifer E. Dugan, PhD.

Jenifer E. Dugan, PhD.
Marine Science Institute
University of California
Santa Barbara, CA 93106-6150
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Fax: 805-893-8062
email: j_dugan@lifesci.ucsb.edu

6/23/2008
Response to Comment O-9-1. Please see response to comment I-2-1.

Response to Comment O-9-2. The information regarding specific native wetland plants currently growing near the west side of the eucalyptus trees on Camino Majorca is noted. Please see response to comment I-42-5 regarding measures the University will take to avoid or minimize impacts on aquatic resources.

In addition to requirements of EIR mitigation, the LRDP contains policies specifically designed to ensure that the LRDP will have a minimal impact on biological resources (ESH-1 through ESH-29). The commenter states that “the conversion and development of any of the few remaining undeveloped coastal bluff lands […] can not be justified or offset by mitigation”. As stated in the response to Comment O-9-1, all LRDP proposals in these sensitive areas must comply with regulations, all LRDP policies, and EIR mitigation as a condition of project approval.

Response to Comment O-9-3. Please see response to comment I-2-1.
Each comment below pertains to the Draft EIR 2.0 Summary of Environmental Impacts and Mitigation Measures.

My comments are in bold

4.13 Transportation and Circulation: TRAFFIC-1 Mitigation: (3) Continue to work with Santa Barbara County to create new roadway connections between Isla Vista and the Main Campus.

The impact analysis for pedestrian, automotive and bicycle safety is inadequate. Sidewalks in Isla Vista are not continuous and lanes are narrowed by cars parking on the side, which leaves pedestrians inadequately protected from automotive and bicycle traffic. Creating additional roadway connections between Isla Vista and the Main campus (as a method for reaching campus from Goleta) adds potentially serious impacts which are neither addressed nor mitigated in the Draft EIR.

(4) Every three years monitor traffic conditions on campus and at impacted nearby City and County intersections and roadways. This mitigation is insufficient, in light of the population increase projected. Monitoring needs to be kept in line with population increase, as well as directly after a change has been implemented. If problems arise, solutions need to be implemented quickly and efficiently.

TRAFFIC-7A UC Santa Barbara shall continue to provide an extensive bicycle and pedestrian network on campus and monitor conflicts between the various modes of travel on campus. This mitigation is insufficient and needs to be extended through Isla Vista and West Campus, in light of the purchase of the Devereux property.

4.1.2 Recreation: REC-2A. The University shall phase the construction of recreational facilities and playfields for each added increment of new enrollment. This mitigation is inadequate. Open fields, accessible by the community for team sports have been restricted or removed due to construction of University Housing. More community accessible playfields need to be restored in addition to REC-2A mitigation items.

In light of the burden the increase will place on the city of Goleta, I support the Reduced Enrollment Alternative (3,000 student increase rather than the 5,000 student increase). The 3,000 student increase should then be monitored to see if a further increase is feasible before going ahead with the additional 2,000 students.

A cap of the number of staff and faculty added should also be considered in addition to the number of students. Each additional faculty and staff member, especially if they relocate additional family members, requires additional city and county resources.

Sue Chester
Board Member
Citizens for Goleta Valley
Letter O-10
Sue Chester
Citizens for Goleta Valley

No Date

Response to Comment O-10-1. The RDEIR’s traffic analysis assumes that all roadways and intersections have been constructed in compliance with the applicable industry safety standards, and that proposed improvements would also be constructed in the same manner.

Please see response to comment I-44-8A regarding the safety of the proposed new bicycle connections along Ocean Road.

Response to Comment O-10-2. The mitigation monitoring program is outlined under LRDP Mitigation TRAFFIC-1A Section 2 in the Recirculated Draft EIR and is only one of several proposed mitigation measures. Increases in traffic volumes will be determined through mitigation monitoring and the University will quantify traffic volume changes through the collection of actual traffic counts at campus gateways and nearby intersections. The monitoring program will be used to identify the appropriate timing for the implementation of required mitigation measures.

Response to Comment O-10-3. The LRDP contains an extensive bicycle system including bicycle lanes through West Campus and connection to Isla Vista, as shown in Figures 4.13-4A and 4.13-4B.

Response to Comment O-10-4. Use of campus facilities by the general public is addressed throughout the Recreation section of the EIR. The following is excerpted from the Recreation section (p. 4.12-26, 27):

The University will continue to offer its recreation area to the general public, especially through the youth sports programs and (limited) membership in the UCEN.

In addition, the University maintains the previously mentioned beaches and coastal access ways for its associated populations, as well as for the public at large.

There will be use by University associated populations of local, non-University recreation facilities. To reduce the demand for these facilities, the University will construct on-site facilities in its new and redeveloped housing facilities.

The University provides many recreational resources to the general public, as outlined in Table 4.12-2 of the EIR (p. 4.12-6). These include active recreation field facilities such as Storke Fields and tennis courts, which are available for community use, including the general public.

As noted in the Recreation section, the University, Cities of Goleta and Santa Barbara, and the County provide recreational facilities for the general public. In addition to active recreation, the University provides passive recreation and open space areas which are of regional importance. The EIR found that the population would be adequately served by a combination of active and passive recreational resources throughout implementation of the 2010 LRDP (DEIR, p. 4.12-25, 26).

Response to Comment O-10-5. The commenter’s statement in support of the Reduced Enrollment Alternative with ongoing monitoring is noted.

Response to Comment O-10-6. The increase in faculty and staff is related to the proposed increase in enrollment. The EIR analyzes the impacts of the increase in faculty and staff proposed in the 2010 LRDP.
Increases in faculty and staff and enrollment beyond the amounts proposed in the 2010 LRDP and analyzed in this EIR would require additional environmental review.
SANTA BARBARA REGION CHAMBER OF COMMERCE

Statement of Position on UC Santa Barbara’s Long Range Development Plan

May 27, 2008

The following Statement of Position was adopted by the Board of Directors of the Santa Barbara Region Chamber of Commerce at its meeting of May 27, 2008:

The Chamber of Commerce views the University of California as an essential part of the region’s economic, cultural and educational vitality. It is a consistent source of business and technological innovation, and is attracting top flight researchers and teachers in a variety of fields. As a result, the Chamber supports the university’s efforts to expand and modernize its physical facilities so that it is better positioned to fulfill its mission.

The Chamber supports the goals, objectives, plans and programs of the university’s Long Range Development Plan. In particular, we strongly commend the Plan’s goal of providing housing for the additional students, faculty and staff expected over the next 20 years. This commitment to providing housing on or near the main campus reflects a dedication to principles of sustainability and to the welfare of the university’s personnel.

The Chamber of Commerce believes that the Long Range Development Plan would be strengthened by an expansion of the on-campus housing program to address the existing gap between the number of people working and studying on campus each day and the housing available on or near campus for those students, teachers and staff. The current housing deficit results in excessive commuting from areas outside the South Coast. As a major local employer, UCSB has the opportunity to provide leadership in the effort to reduce commuting (with its resulting environmental, social and community impacts) by providing additional on-site housing.

Email

Steve Cushman
President
Santa Barbara Region Chamber of Commerce
924 Anacapa Street
Santa Barbara, CA 93101
Tel. 805-965-3023x104
steve@sbcchamber.org

"BUSINESS IS GREAT IN SANTA BARBARA AND SANTA BARBARA IS GREAT FOR BUSINESS"
Letter O-11
Steve Cushman, President
Santa Barbara Region Chamber of Commerce

May 27, 2008

Response to Comment O-11-1. A core component of the 2010 LRDP is to house all future increases in University enrollment and University employment. The EIR analyzes and mitigates the impacts of that future growth and development, rather than existing conditions. Nonetheless, while the 2008 LRPD would result in an increase in faculty and staff of 1,700 persons, the LRDP would accommodate 1,874 housing units for faculty and staff, which would create approximately 174 units for existing University housing demand.
To whom it may concern,

As Board Secretary of Shorelines & Watersheds, and temporary coordinator of the Devereux Slough Monitoring Program I am writing to submit comments in regards to the University of California Santa Barbara’s Long Range Development Plan (LRDP), with special regards to ESHA-1 of section F. Open Space & Landscape in the LRDP (2008 draft) stating:

The campus shall implement the Wetlands Restoration and Management Plan for Storke Wetlands and the Devereux Slough as approved by the campus wetlands Management Committee and UC Santa Barbara in conjunction with adjacent development projects.

Previous recommendations and management plans issued by UCSB have failed to be implemented. The UCSB Recommendations for Hydrology, Water Quality and Sediment for West Campus Wetlands advised that long-term monitoring be initiated at Devereux Slough to track biological, hydrological and landscape level changes within the ecosystem. Although these management recommendations have been made, as well as the creation of a wetlands management plan which includes the Devereux slough (Davis et al., 1990), the slough has not been actively managed and recommendations from these studies have not been implemented. No systematic and regular study has been conducted at this system until the Devereux Slough Monitoring Program (DSMP) was independently initiated in 2002 by Darcie Goodman as her PhD thesis for Bren School of Environmental Management. Prior to the creation of DSMP program there had only been sporadic research projects that have measured snapshots of various parameters.

The Devereux Slough Monitoring Program is an intensive, long-term, ecosystem level study of the Devereux Slough based upon the recommendations from the UCSB Campus Wetlands Management Plans (Ferren 1987, Davis 1990). Monitoring parameters include regular fish and invertebrate sampling, bathymetric mapping, vegetation surveying, bird monitoring and water quality measurements. (Detailed monitoring parameters and procedures are available upon request.) The DSMP has been collecting data for the past five years, and the continuation of this program is essential to monitoring the effects of the proposed LRDP developments on this sensitive system.

The 1990 UCSB Campus Wetlands Management Plan states:

In order to ensure proper management of campus wetlands, UCSB should provide adequate funds to conduct routine collection and analysis of data on surface and ground water levels, water quality and sedimentation, botanical, invertebrate and vertebrate resources.
Since 2002, the DSMP has been sustained without monetary support from the University. Shorelines & Watersheds, in coordination with Coal Oil Point Reserve (letter from COPR to follow) urge the University to provide funds to support the continuation of the Devereux Slough Monitoring Program, in accordance with Campus Wetlands Management Plan, and 2008 Draft LRDP. Supporting the DSMP will fulfill the University’s obligations to monitor the Devereux Slough as a West Campus Wetland.

The DSMP research over the past five years has allowed for a realistic understanding of the time, effort, and monetary funding required for conducting long-term monitoring of this sensitive wetland system. To ensure optimal functioning, the DSMP program requires a Project Coordinator, employed part time; plus materials: ~$1600/yr. The DSMP Coordinator would be responsible for ensuring the continuation of the long-term data collection for the DSMP. Other responsibilities of the Coordinator include: training and recruiting field researchers, analyzing data, reporting trends and findings to the community, production of annual reports, and maintaining monitoring equipment. The Coordinator could be a shared position between Coil Oil Point Reserve and the Cheadle Center for Biodiversity and Ecological Restoration (CCBER), responsible for monitoring Devereux Slough as well as other campus wetlands, such as Storke Wetlands. If UCSB does not provide funding for DSMP five years of data collection will be lost, and the University will not fulfill their obligations of responsible wetland management. Thank you for taking these comments into consideration.

Sincerely,

Tara Longwell
Board Secretary of Shorelines & Watersheds
P.O. Box 80423 Goleta, CA 93118
805-893-5092

REFERENCES


Letter O-12  
Tara Longwell  
Board Secretary of Shorelines & Watersheds  

May 27, 2008  

Response to Comment O-12-1. The Campus Wetlands Management Plan (Part 4) of 1990 (Davis, et al) was written pursuant to a condition of Coastal Commission approval for the 1990 LRDP. The Management Plan includes as one of its “general recommendations” (p. 19) to fund the routine collection and analysis of data, but that funding has not yet been allocated. However, the other two “general recommendations” of the Plan have been implemented: for the University to spearhead the management and restoration of Storke and Devereux Slough wetlands (p. 19); and to designate the Campus Wetlands Committee as the administrative entity (p. 20), representing a joint effort among University, County, State, and Federal staff, and chaired by the Coal Oil Point Reserve Committee chairman.

In addition, many other recommendations of that Plan have been addressed in the form of restoration projects implemented by the University, as noted in the LRDP (pp. H.5, H.6). Finally, in keeping with its commitment to develop its lands with minimal or no impact on sensitive resources, the 2010 LRDP contains an extensive set of polices (ESH-1 through ESH-30; pp. F.8-F.11) to protect the Storke and Devereux slough wetlands. The first policy is excerpted here:

“ESH-1 The campus shall implement the Wetlands Restoration and Management Plan for Storke Wetlands and the Devereux Slough as approved by the campus Wetlands Management Committee and UC Santa Barbara in conjunction with adjacent development projects.”

Response to Comment O-12-2. LRDP Policy ESH-1 (LRDP, p. F.8) requires the University to implement the Wetlands Restoration and Management Plan in conjunction with the development of adjacent projects. To clarify, the following mitigation has been added to Impact BIO-1:

LRDP Mitigation BIO-1G: The University shall provide support for the continuation of the Devereux Slough Monitoring Program (DSMP), in accordance with the Wetlands Restoration Management Plan (WRMP). This may include funding to ensure the continuation of long-term data collection at the time of development of adjacent University property to the applicable wetland areas.
June 20, 2008

University of California
Office of Campus Planning & Design
c/o Vision 2025
Santa Barbara, CA 93106-1030

RE: Long Range Development Plan

Dear Campus Planners:

UCSB’s Long Range Development Plan briefly mentions historic structures in its draft EIR. The Goleta Valley Historical Society, of which I am president, strongly urges in particular the preservation and restoration of the oldest of these structures, which date from the era of the Campbell Ranch (1919-1945). These include the Campbell Mansion, now known as Jacobs Hall, on the recently acquired Devereux property. The Mansion was designed in the Spanish Colonial style by noted architect James Osborne Craig who also designed El Paseo and other classic Santa Barbara landmarks. After his early death in 1923, the building of the mansion was carried out by Craig’s widow, Mary Mclaughlin Craig, and completed in 1924. Although Mrs. Craig had no formal architectural training, she ranks among the notable, and few, female architects of the era, who included Lutah Maria Riggs and Julia Morgan. Mrs. Craig designed the unique Campbell Barn at the far west end of the property (now behind Isla Vista School) which the University has unfortunately allowed to fall into neglect following the 1978 earthquake. The plans and drawings for this elegant barn are in UCSB’s Art and Architecture Archive. Also significant, and significantly neglected, is the iconic Spanish colonial style palomar or dovecote at Coal Oil Point, which dates from the Campbell era. Other artifacts of the Campbells’ presence include the nearby memorial granite cross that marked Colin Campbell’s grave and the brick portals which marked the entrance to the private family cemetery as well as the little beach house with a stone fireplace. The graceful olive trees lining Slough Road and the cypress grove at Coal Oil Point are living legacies of this illustrious period in Goleta history.

The Campbells – Colin Powys Campbell (1859-1923) and his wife Nancy Leiter Campbell (1872-1930) were important members of the Santa Barbara community during their time on the ranch. Nancy Carver Leiter was the daughter of a major Chicago figure, Levi Z. Leiter, one of the founders of Marshall Field’s department store, and she shared with her siblings in his enormous fortune, valued at $100 million in 1920. The Leiter family moved in elevated social circles of the US and Europe. Nancy’s siblings included Mary Victoria Leiter who became Lady Curzon, Vicereine of India, Marguerite (Daisy) Leiter who married the Earl of Suffolk and Berkshire, and Joseph Leiter, a famous financier and sportsman whose attempt to corner the wheat market in 1898 is legendary. Two UCSB researchers, Professor Anita Guerrini (History and Environmental Studies) and Dr. Jenifer Dugan (Marine Science Institute), have been researching the history and ecology of the Campbell Ranch for some time, and I recommend that you consult with them for more specific information.
Thank you for your consideration.

Sincerely yours,

Robin Hill Cederlof, President
Goleta Valley Historical Society
304 N. Los Carneros Road
Goleta, CA 93117
Response to Comment O-13-1. Please see response to comment I-38-1.
Preservation of Campbell Mansion and outbuildings
David [info@carpinteriahistoricalmuseum.org]

University of California
Office of Campus Planning & Design
c/o Vision 2025
Santa Barbara, CA 93106-1030

Dear Campus Planners:

As a UCSB alumnus, a Goleta resident, and local historical museum curator and educator for 22 years, I add my voice to that of the Goleta Valley Historical Society and strongly urge the preservation/restoration of the Campbell Mansion, barn, and other historic structures on or near the Devereux property. These architecturally significant and historically rich reminders of Goleta Valley’s past and its strong allure to those who could choose to live anywhere in the world are important and irreplaceable evidence of the truly unique and special place this is. To ignore their value would be counter to the educational mission the University stands for.

It is my sincere hope that plans for future development of this property will always take into account the extremely valuable historical significance of these buildings and associated structures.

Thank you for your careful consideration.

Sincerely yours,

David Griggs
Director/Curator
Carpinteria Valley Museum of History
david@carpinteriahistoricalmuseum.org
(805)684-3112
Letter O-14

David Griggs, Director/Curator
Carpinteria Valley Museum of History

No Date

Response to Comment O-14-1. Please see response to comment I-38-1.
Hi Shari and Melissa,

Thank you for meeting with us today. Here are our comments. Please feel free to call me or email if you have any questions. I am also glad to meet Patricia to correct some of the maps, Cris

__________________________
Cristina Sandoval
Director, Coal Oil Point Reserve
Marine Science Institute
University of California
Santa Barbara, CA 93106

* sandoval@lifesci.ucsb.edu
http://coaloilpoint.ucnrs.org

Comments to LRDP vision 2025
From: Cristina Sandoval, Sue Swarbrick
Coal Oil Point Reserve, Natural Reserve System

General comments:

Designation of COPR in maps and text.
In several maps (i.e Fig B7, B10, C1, D2, F1, F8), the COPR is designated as open space or west campus. Open space designation can be confusing because in some places the document assumes that open space is open to recreation. Possible solutions are to not call the COPR as open space. Another one is to maintain it as open space but have it more clear at the beginning of the document the overlay restrictions of the reserve (as in page H3, last paragraph under Open Space).

There is a complication of calling the reserve west and north campus (e.g Fig B-5, B8, D2) because its parking policies are different from campus policies. Mike Fisher has agreed that the reserve would have free parking for users because the reserve was not campus, otherwise it would be an anomaly. The main reason the COPR boundary is being redrawn in the area near the Cliff House is to include an inside parking area that is not camp (the outside parking lot is campus).

Page D15. Under COPR
Isn't the Cliff House moving to Devereux? Spelling error: Pub-lic facilities

Page E-9. Last 2 paragraphs of the first column. New parking spaces that facilitate public access to COPR needs to be evaluated for impact to sensitive resources at the
Reserve. We need more details on the specific location of these 20 and 4,000 parking spaces.

ADD new policy. Development that result in an increase in public access to the reserve should be minimized or mitigated.

Page F14.
ADD ERO 16 n. The water quality of the Devereux Slough shall continue to be monitored (note, this was in the 1990 LRDP). The campus shall fund the Devereux Slough monitoring program.

What are the housing plans at the Devereux campus? COPR needs to be involved in the planning for Devereux Campus because of its close proximity to the Reserve.

Comments:
1) There are no references to dog and horse policy on the reserve. Needs to ADD that horses are not allowed at COPR and dogs are allowed on leash on the high tide zone at the beach, as per the Snowy Plover Management Plan.

2) The reserve boundary needs to be included in all maps. Fig B9 is correct in separating COPR from West campus

3) Fig B-6. Addition and ESHAS are not correct

4) Page B13. Second paragraph. Add: The reserve system was established ……..ecological, RESEARCH, and education value.

5) All maps with trails. A small spur of a trail that goes into the beach from the point (old delta trail) has been removed since 2002. This spur needs to be removed from all maps.
   Also, the northern portion of the pond trail is incorrect in all maps. Please correct.
   On B11, trail network, remove bikepaths and trail in Reserve.

6) Fig B 13. The locations of some species need to be revised. I can work on that with the map maker.

7) Fig B14. The reserve shows areas already restored but South Parcel shows area to be restored. Map should be consistent and only show past or ongoing projects.

8) Fig D5. The planned housing is not visible in this map.

9) Fig E 2. North end of pond trail is incorrect.

10) Page E-11. I would like a copy of the Sands beach picture. I also have more recent pictures showing the plover habitat and people on the beach.
11) Page E-11. Trans 5. The parking at COPR will not provide coastal access. The 50 spaces are for the reserve and conference facility. IMPORTANT

12) Trans 4 and 5. Remove COPR as parking area. This has already been decided by the CCC on the North campus approval.

13) Fig F 1. There is a legend for wetlands but there are no wetlands shown in the reserve.

14) Fig F2. The greensward should also be discussed in terms of a green corridor for wildlife and plans for its restoration to facilitate wildlife movement.

15) Fig F7. There is a wetland under the eucalyptus row bordering the east side of the tanks. That is not mapped. Goby needs more spots on the slough. There area native grasslands in the reserve that should be included as ESHA. These have not been mapped but we could do it.


17) ESH 3. DELETE. COPR mows grasslands to encourage native grasses.

18) ESH 9. ADD: , unless if they are to be restored.

19) ESH 14. The ratio for grassland replacement should be much higher as it is difficult to restore and maintain grasslands.

20) ESH 16. 100 ft is not sufficient. Studies have found an effect of pets near protected areas going 200 ft inside of the protected area. A good example is the existing West campus housing where one would commonly see cats on the bluff top.

21) ADD: ESH 16 d. Outdoor pets shall not be prohibited on west campus mesa. The campus shall trap cats and dogs that wonder into the reserve. ADD: 16 e. trash cans should be locked and pet food should only be placed indoors to prevent attraction of raccoons, skunks, and crows which are predators of sensitive species at the reserve.

22) ESH 20 b. ADD, and for restoration with native species.

23) ESH 24. Exception (a) contradicts ESH 24.

24) Page F14. ADD ERO 16 n. The water quality of the Devereux Slough shall continue to be monitored (note, this was in the 1990 LRDP). The campus shall fund the Devereux Slough monitoring program.
ADD ERO 22. Construction that could potentially impact the Devereux Slough such development of infrastructure or sedimentation removal along the creek shall be coordinated with the Coal Oil Point Reserve. The campus should fund the reserve staff time to monitor the project and ensure that no impact to the reserve's resources will occur.

25) Page H 5. Under RESERVE. Change 105 acres to 165 acres. ADD on bulleted points:
Buildings for the COPR headquarters
Installation of research equipment that does not adversely impact sensitive resources.

26) Page D-15. There isn't sufficient explanations of the COPR master plan. ADD: Dilapidated structures USED FOR RESERVE FUNCTIONS, would be removed and replaced with NEW ONES, within a courtyard compound where structures SUCH AS STAFF OFFICE, MEETING ROOM, BATHROOM, WORKSHOP, GREENHOUSE, STORAGE SHEDS, NURSERY, ETC, would be clustered in a CENTRALIZED unobtrusive location.

F-12 and Mar 1 contradicts our building plans. Change to: Only structures that would be used in conjunction with research and education at the reserve and structures used for the general maintenance and stewardship of the reserve would be allowed. These include weather stations, greenhouses, storage sheds, maintenance buildings, staff office, docent bathroom, meeting room, and manager residence.

27) Mar5, F13, ADD steward for COPR. Clarify that reserve steward is not the same as the South Parcel steward.

28) Page E12, TRANS 11. ADD c) a boardwalk/stairway EAST OF Coal Oil Point.

29) Page F9. DELETE Natural from Coil Point Point Reserve

30) Page H5,
Letter O-15  
Cristina Sandoval, Director, Coal Oil Point Reserve  
UCSB Marine Science Institute  

June 23, 2008  

This letter comments on the 2010 LRDP, not on the EIR.

Response to Comment O-15-1. Figure B-7 shows the boundary of the COPR, not general open space, as does Figure B-10. Figure C-1 distinguishes between buildings, roads, and all other areas. Figures D-2, F-1, and F-8 have been changed to add the boundary of the COPR. In addition, the following language has been added to page B.13: “The COPR is covered by an overlay which restricts development and uses on the Reserve in order to protect the sensitive habitats and species found there.”

Response to Comment O-15-2. A bullet on LRDP page H-5 has been added to note that parking is an allowed use on the Reserve.

Response to Comment O-15-3. The LRDP does not propose moving the Cliff House to the Devereux property. The text merely acknowledges that eventually the Cliff House will have to be removed and could possibly be relocated near other Reserve buildings.

Response to Comment O-15-4. The 4,000 parking spaces referenced in the comment are primarily associated with new on-campus housing and academic programs. The LRDP would additionally provide up to 100 coastal access parking spaces, as discussed in LRDP Policy TRANS-4. In accordance with Coastal Commission requirements, no public parking is proposed for Coal Oil Point. New coastal access parking at the Devereux site would facilitate access to coastal trails in this area. Please see response to comment I-44-27A for further information on parking at Coal Oil Point.

All coastal public access parking facilities would conform with Coastal Act policies, Mitigation Measures BIO-1A through BIO-1D, all other mitigations identified in the EIR pertaining to the construction of facilities near sensitive resources, and the policies of the 2010 LRDP (see LRDP Policy Trans-10, p. E.11) that serve to limit coastal public access where sensitive resources would be adversely affected.

Response to Comment O-15-5. LRDP policy ESH-1 (p. F.8) requires the University to implement the Wetlands Restoration and Management Plan. A new policy has been added to the LRDP as follows: “Policy ESH-29. The water quality of Devereux Slough shall continue to be monitored by the Coal Oil Point Reserve.” As discussed in response to comment O-12-2, monitoring in Devereux Slough is also the subject of Mitigation Measure BIO-1G.

Response to Comment O-15-6. Proposed housing on the Devereux property is shown on page D-15 of the LRDP. The Campus will consult with COPR regarding any specific proposals for such housing, which will also be subject to environmental review and the accompanying public process.

Response to Comment O-15-7. Horse and dog access to the Reserve is restricted by the COPR, which, pursuant to University of California policy, has the authority to limit uses and behaviors that are inconsistent with the Reserve’s mission.

Response to Comment O-15-8. The COPR boundary has been added to several maps, as described in response to comment O-15-1.
Response to Comment O-15-9. Figure B-6 has been revised to combine the Addition area to the rest of the COPR and all has been identified as ESHA.

Response to Comment O-15-10. The word “research” has been added to the text of the LRDP on page B.13, second paragraph, as noted.

Response to Comment O-15-11. The requested corrections to LRDP figures are noted.

Response to Comment O-15-12. Figure B-13 has been updated with the additional information.

Response to Comment O-15-13. The LRDP text makes clear that areas depicted are completed, on-going or proposed future restoration sites. The Implementation section of the LRDP (page H.4) describes each of these areas in detail.

Response to Comment O-15-14. Figure D.5 is not meant to be a site plan or detailed map but, rather, a perspective rendering of the campus area, and shows the proposed housing on the Devereux property.

Response to Comment O-15-15. Figure E-2 has been updated to reflect the correct alignment of the Pond Trail.


Response to Comment O-15-17. The initially proposed 50 public parking spaces at the COPR have been removed from the LRDP per Coastal Commission direction.

Response to Comment O-15-18. Please see responses to comments O-15-17 and I-44-27A for information on parking at Coal Oil Point.

Response to Comment O-15-19. The wetland designation has been removed from Figure F.1 as wetlands are more completely included in Figure 7.

Response to Comment O-15-20. Text has been added to the Greensward discussion in the LRDP to include wildlife passage.

Response to Comment O-15-21. Figure F.7 has been updated with the additional information.

Response to Comment O-15-22. The COPR Management Plan has not been finalized. It will be implemented under the authority of the University of California Natural Reserve System. Portions of the COPR Management Plan (draft) related to Snowy Plover management and public access that are within the jurisdiction of the Coastal Commission have been submitted and Commission approval is pending.

Response to Comment O-15-23. Mowing grasslands to encourage native species regeneration is allowed under ESH-3.

Response to Comment O-15-24. LRDP Policy ESH-9 has been revised to reflect this change.

Response to Comment O-15-25. The Coastal Commission now requires a 3:1 ratio for native grassland replacement. Policy ESH 14 has been revised to reflect this ratio.

Response to Comment O-15-26. In general, larger setbacks with buffers have greater value as resource protection measures. Many regulatory agencies use 100 feet as a typical standard.
Response to Comment O-15-27. Resource management activities used on the COPR, including those proposed by the commenter, are within the authority of the Natural Reserve System.

Response to Comment O-15-28. The suggested language has been added to LRDP Policy ESH-20.

Response to Comment O-15-29. LRDP Policies ESH-23 and ESH-25 have been combined. The new policy, now numbered ESH-23 sets a maximum noise level and provides for certain exceptions to that rule. ESH-24 remains a separate policy to which the exceptions in ESH-23 do not apply.


Response to Comment O-15-31. The DEIR concludes that with the application of identified mitigation, the Project’s impacts on aquatic habitat, including Devereux Slough, will be less than significant. Additional COPR staff time will not be necessary to implement any of the identified mitigation measures.

Response to Comment O-15-32. The total acreage of the COPR is closer to the 170 acres noted in the EIR. The text on LRDP page H.5 has been revised to reflect this number.

The text on LRDP page H.5, as written, accommodates the uses that the commenter mentions.

Response to Comment O-15-33. Page D-15 of the LRDP would allow the types of uses that are described in the comment.

Response to Comment O-15-34. LRDP Policy MAR-1 does not list all permitted structures, but provides examples of allowable structures.


Response to Comment O-15-36. The suggested language has been added to LRDP Policy Trans-11. Figure E.3 visually depicts the approximate location.

Response to Comment O-15-37. The suggested edit has been incorporated into LRDP page F.9.
Re: Storke Ranch request regarding UCSB LRDP: keeping Phelps Road closed

Dear UC Regents:

At Storke Ranch we are very concerned about UCSB’s Long Range Development Plan and its impacts to Goleta and our community. We are particularly opposed to the opening of our peaceful, cul-de-sac community road, Phelps Road, to through traffic. We request that the University remove the opening of Phelps Road to through traffic from the EIR because:

1. Connecting Phelps and Mesa roads does not resolve the LRDP’s traffic impacts and instead generates its own significant impacts.

2. Storke Ranch and the UCSB family student housing complex are sensitive residential neighborhoods located on either side of the proposed connection between Phelps and Mesa roads. There is a day care center, child and adult learning center, pool, tennis courts and other recreational facilities, as well as affordable rental units in the immediate vicinity of the proposed road connection.

3. Connecting Phelps and Mesa roads will more than triple the volume of traffic passing through these sensitive neighborhoods.
4. The EIR lacked adequate information to assess the impact of this additional traffic on the neighborhoods along Phelps and Mesa roads.

- The EIR failed to analyze traffic impacts to the Bayberry Lane/Phelps Road intersection. This intersection is one of only two access points to the Storke Ranch neighborhood. The proposed Phelps/Mesa connection will more than triple traffic on the Phelps/Mesa road segment, so impacts to the Bayberry/Phelps intersection may be substantial and must be assessed.
- The EIR only analyzed Peak PM traffic flows through the Phelps/Storke intersection. The PM traffic flows generate significant impacts and the Peak AM traffic flows may also generate significant impacts. Data for Peak AM traffic flows must be collected and analyzed.
- The noise study did not perform modeling of noise impacts along the proposed Phelps/Mesa roadway connection. This modeling is necessary to evaluate the noise impacts associated with more than tripling of traffic along Phelps and Mesa roads.
- The EIR did not analyze the traffic increase at the connection point, in front of the affordable rental units and playground. Based on a 24 hour video traffic count by a resident, it appears that traffic in this area will increase by a factor of more than 200. Safety and environmental justice issues need to be assessed.
- The EIR must be revised to include this critical information and analysis and the revised EIR must be resubmitted for public comment.

5. The Phelps/Mesa road connection will cause significant environmental impacts.

- It will cause two intersections and two existing roadway segments to fall below acceptable LOS conditions.
- It will significantly increase noise and air pollution levels in sensitive residential neighborhoods.
- It will disproportionately affect residents of the affordable rental units located at the proposed connection point, generating environmental justice concerns.

6. The Phelps/Mesa road connection will sever a heavily used east-west bicycle route, creating an unsafe area of bicycle/car interaction.

7. The connection will create unsafe conditions for community members who need to walk across Phelps Road to access community facilities (day care center, play areas, tennis courts, swimming pool, gym, adult learning center, orchard, and RV parking lot), to get to the bus stop (particularly kids going to school), and to walk to IV elementary school (apartment residents).

8. Opening the connection will slow fire and emergency access along Phelps Road which is currently uninhibited by traffic and has through capability via the automatic gate at the end of Phelps Road.
9. Opening the connection will make it difficult for Storke Ranch residents to exit the community and cause traffic to back up into the community during busy travel times (stacking problem).

10. Opening the connection will impact sensitive wetland habitats adjacent to Phelps and Mesa roads.

11. Connecting Phelps and Mesa roads will not solve UCSB’s traffic problems. Traffic impacts remain significant even with the proposed connections and roadway improvements in the EIR.

12. Increasing Goleta’s public transit network is a viable solution to UCSB’s and the City’s traffic problems. This will generate more benefits and fewer impacts than the proposed Phelps/Mesa connection, and should be explored in a revised EIR.

We request that the university:

1. Revise the EIR and resubmit it for public comment.

2. Include in the revised EIR a complete analysis of the impacts associated with the Phelps/Mesa connection (see above).

3. Include in the revised EIR an analysis of alternative feasible mitigation measures that could lessen environmental impacts including:
   a. Substantially increasing public transit opportunities. Enhancing public transit in West Goleta is a feasible alternative that would substantially lessen the Project’s impacts. Implemented as an alternative to the proposed Phelps/Mesa connection, increasing West Goleta’s transit service would eliminate impacts to the Storke/Phelps and Mesa/Los Carneros intersections, as well as eliminate the other traffic-related impacts caused by opening Phelps and Mesa Road to through traffic. The transit alternative will also reduce overall traffic impacts and provide a tangible benefit to a community currently bearing the brunt of UCSB’s traffic impacts.
   b. Prohibiting freshmen and sophomore students from bringing cars to campus.
   c. Widening El Colegio to two lanes along its entire length. Currently, El Colegio Road is one of the main access routes to UCSB and there is a bottleneck where the road narrows from 2 lanes in each direction to one lane in each direction. The university is currently planning to widen the portion of El Colegio between Los Carneros and Stadium Road as mitigation for the new UCSB graduate student housing north of El Colegio. The university should agree to fund Phase II of the widening project, west of Los Carneros, and include this in their traffic analyses in the EIR.
4. Include in the revised EIR an analysis of feasible project alternatives that could substantially lessen the Project’s environmental impacts, including the possibility of developing a satellite campus in Santa Maria. Although the EIR considered relocating new development and growth off campus, it only considered lands in the immediate vicinity of the existing campus (see EIR p. 5.0-2). The Santa Maria satellite alternative would simultaneously further project objectives of the LRDP, reduce traffic and other impacts, and provide a much-needed opportunity for North County residents to attend UCSB closer to home.

Thank you for your consideration.

Sincerely,

Storke Ranch Master Association Board of Directors
Letter O-16
Kelly Hildner, President
Storke Ranch Master Association

June 23, 2008

Response to Comment O-16-1. Regarding impacts to wetland habitats along Phelps and Mesa roads, please response to comment O-18-3.

Regarding the proposal to ban certain students from bringing cars to Campus, please see response to comment I-26-8B.

Regarding all other comments, please see Master Response - Phelps/Mesa connection.
Dear Friends;

I attach written comments concerning the draft EIR. If you can acknowledge receipt I'd appreciate it.

Dick Flacks

To: Office of Campus Planning & Design, UCSB

From: Richard Flacks, chair SBCAN Committee on Housing, Open Space and Transportation

RE: COMMENTS ON LRDP EIR

The following recapitulates and expands on comments made by myself, Mickey Flacks, Bob Potter and Olivia Uribe on behalf of SBCAN at the hearing on 6/3/08.

As we understand the EIR, the proposed LRDP will create serious, probably unmitigatable impacts on local water supply, traffic and housing supply. These impacts are not adequately remedied by the terms of the project. The impacts result from the addition of 5000 new students, some 350 faculty positions, and hundreds of new staff positions. But the growth generated by UCSB in relation to the project is exacerbated by the large number of faculty and staff retirements during the 15 years of the project, requiring hiring of replacements ... Most of these retirees will not be leaving the area, and no provisions are proposed for housing the replacements. Faculty and staff hiring will also bring large numbers of additional family members as well. Finally, such direct growth generates considerable indirect growth in the local work force.

1. **Is the project justified?** These impacts might be supportable if they are justified by the social importance of the project. Our first question then is whether UCSB has adequately justified the level of growth in the student body it seeks. It might be assumed that such enrollment growth is necessary to accommodate increased student demand for admission to the university. But we have seen from UCSB no detailed accounting of the expected demand state wide, and the specific ways UCSB enrollment growth will help meet the state demand. Current University of California estimates show a leveling off and even decline in enrollment demand during the coming decade. A considerable portion of the proposed increase in UCSB enrollment is planned to be targeted for increased graduate student enrollment. Public understanding of the UCSB project requires explication of how UCSB is in fact planning to help increase access to the University during the coming period. It also requires that the EIR examine alternatives to enrollment increase to accomplish that
goal (for example, examining the potential for satellite campuses, year round operation and other possible alternatives).

UCSB claims that the “maturation” of its research and teaching programs requires new positions to enable hiring of additional faculty. Note that this justification is NOT about the need to teach more students, but about the national and international standing of UCSB. Certainly the community needs a fuller accounting of why that goal is important enough to require the negative impacts of the plan, how and why faculty growth is necessary to achieve that goal, and whether there are alternatives to growth that might serve that goal. In particular, the large number of positions that become available because of faculty retirement seem to provide some opportunities for the kinds of resource reallocations that the “maturation” goal implies. The EIR’s findings of significant negative impacts on fundamental aspects of community life require UCSB to make a better case for its growth than it has until now.

2. Does the project help alleviate the local housing crisis? The crisis has to do with the cost of housing in the region—cost that affects the local middle income workforce, including professionals, as well as low income workers and residents. UCSB plans a very ambitious housing program that represents an imaginative and valuable use of its own space. It sets as a goal the housing of half of its undergraduates and all of those occupying new faculty and staff positions. But as mentioned above, an effort to house the new population won’t alleviate existing housing crunches, and is likely to make them worse. One reason for making the situation worse has to do with the retirement situation; a second with the multiplying effect of university growth on the wider job market.

The plan creates a further worry: it acknowledges that there may be lags between enrollment increases and the construction of new housing. It tries to mitigate this by seeking to restrict this lag to 4 years. The proposed mitigations are very weak. A stronger measure would be to hold enrollment increases back until housing to accommodate them is produced and/or available.

The university is not planning to provide housing to the hundreds of replacement faculty and staff that will be hired, most of whom will be new members of the community.

The EIR considers an alternative growth scenario that would aim for the addition of 3000 students. But the EIR accompanies this with the notion that smaller growth would result in a smaller number of new housing units being built by UCSB. If UCSB were to maintain its proposed housing plan but plan for a smaller enrollment increase it could house many of its replacement hires and even consider providing housing for retired faculty and staff. That scenario would make a real contribution to alleviating the local housing crisis, relieving pressure throughout the region.

3. Water! The EIR finds that the proposed project will exceed the entire available water supply for the Goleta Valley. UCSB conservation measures are admirable but
insufficient. UCSB reliance on state water to make up a deficit provokes skepticism about the actual availability of state water. (Recent court decisions have ruled against development based on “paperwater”) The EIR states: “Reducing demand by 24% of the anticipated requirements for the 2008 LRDP would bring the project within available supplies of the GWD”. The smaller enrollment increase alternative would achieve this demand reduction.

The community might well support this reduced project in preference to the proposed one.

4. **Traffic impacts aren’t adequately analyzed and the project’s weaknesses concerning transportation are not highlighted.** These are some of our concerns with respect to transportation impacts:

a. The EIR doesn’t seem to take account of cumulative traffic impacts from other projects. These include Sumida gardens, Village at Los Carneros—these already approved. Additional projects: Haskell’s Landing, Bishop Ranch, commercial development at airport and in Goleta Old Town. We are also puzzled by the EIR failure to examine Isla Vista’s future development in light of the RHNA high density rezoning. We’re also troubled by the EIR neglect of possible consequences of a failure to pass Measure A. Such a failure might limit a jurisdiction’s ability to increase road capacity and sustain adequate mass transit.

b. Does the EIR adequately examine travel out of the UCSB area to the wider community—e.g. trips by student workers, faculty/staff family working off campus, and the need for campus residents to use services outside of the immediate area?

c. Does UCSB provide adequate, enforceable mass transit alternatives? The incentives planned for use of alternatives should be spelled out, and guaranteed. Incentives for continued use of car—e.g. expanded on campus parking—should be removed. A guaranteed low cost bus pass for students, staff and faculty might be one important mitigation. Much more effort to create viable alternative transit approaches should be embodied in the plan, as part of a thoughtful vision of a campus community less dependent on the private automobile.

d. The EIR appears to underestimate the increased commuting made likely by the project. The EIR woefully misestimates these effects by describing (in section 6.0, page 5) commuting increases from out of county, while not accounting for the main commuting population which travels to the south coast from northern Santa Barbara county. The EIR also fails to try to estimate the indirect impacts of the enrollment increase on the wider workforce (providing an estimate of the overall number of jobs the university’s population generates doesn’t tell us what the possible increase will be). Much of that increase may be forced to commute.

e. The commuting issue must be addressed more fully because of recent rulings requiring EIRs to examine “global warming” and climate change as impact topics. The EIR seems to have included this matter as an after thought, and makes no effort to include traffic and commuting impacts as one of the global warming issues.
We look forward to responses to all the above concerns. Let me conclude by emphasizing the need to consider as an alternative, a plan that would:

- Entail a much reduced level of enrollment growth
- Develop housing and traffic accommodations prior to any enrollment increase
- Develop the planned housing provided by the existing project so that it contributes significantly to reducing the community’s housing crisis (i.e. making new housing available to replacement faculty and staff)
- Include a much richer array of alternative transportation strategies and a reduced accommodation to private cars.
- Integrate fully climate change concerns into all assessments of impacts.
Letter O-17
Dick Flacks
SBCAN
June 20, 2008

Response to Comment O-17-1. A. The physical environmental effects of the project are disclosed in the EIR, and the commenter’s specific comments on environmental issues are addressed below. The commenter also asks whether the project is justified based on “social importance.” The EIR addresses the goals and purposes of the 2010 LRDP (p. 3.0-13) [emphasis added]:

UC Santa Barbara projects a gradual increase in enrollment at an average annual rate of 1 percent, or approximately 250 students per year to 25,000 students by 2025, and a generally slower growth in summer and off-campus programs. Growth is also projected in the graduate student population, to 17% of total enrollment.

This enrollment growth is driven by a number of factors, predominantly by the requirement to accommodate enrollment growth in the UC system as a whole, and the inherent civic responsibility to contribute to California’s educated work force. Under the recent compact with the governor, UC enrollments are anticipated to increase from 180,000 to 240,000 in the next decade. These increases will have to be largely absorbed at the established UC campuses. Consequently, there is an expectation that UC Santa Barbara will take its share of the enrollment; a growth by 5,000 students is one of the smallest forecast for any campus in the UC system. The need for managed growth at UC Santa Barbara also aligns with departmental and divisional/college long range plans. The program of managed growth also anticipates changes in the composition of the state population and turnover of a large portion of faculty due to retirement. An enrollment increase of 1% per year is consistent with the cumulative academic plans of the departments, divisions, and colleges. The proposed rate of enrollment growth is slightly less than the growth rate over the last 10 or more years (Table 3.0-4).

In summary, the primary reason for the proposed 2010 LRDP growth is to accommodate UCSB’s mandated share of enrollment growth for the UC system.1

B. The alternatives section addresses several options to the proposed project, including reduced enrollment and a virtual campus. The EIR identified the reduced enrollment alternative this as the environmentally superior alternative, since it would reduce many significant impacts.

C. The purpose of the DEIR is to disclose the significant environmental effects of the LRDP. The decision to approve the proposed 2010 LRDP, notwithstanding any significant effects on the environment, is within the discretion of The Regents. That decision has not yet been made.

Response to Comment O-17-2. A. The commenter states that the goal of the LRDP “house the new population won’t alleviate existing housing crunches, and is likely to make them worse.” Please see response to comment O-4-1 regarding the EIR’s relationship to existing housing market conditions.

The commenter states two reasons that the LRDP’s housing program would worsen the housing situation: the “retirement situation,” and the “multiplying effect of university growth on the wider job market.” The “retirement situation” refers to faculty and staff vacating positions which would require new personnel. The multiplier effect refers to additional jobs that are created as a result of an increase in the University’s work force. The EIR takes this phenomena into account and discloses that the LRDP would have a significant and

unavoidable impact on housing demand, as described in the discussion of Impact POP-3, RDEIR at 4.10-26 through 29 and 4.10-33 though 33. Please see also Master Response – Population and Housing.

B. Please refer to the Master Response – Population and Housing for a discussion addressing the 4-year lag. See also response to comment A-12-2.

C. Please see response to comment A-10-6.

D. Please see response to comment I-44-17C.

Response to Comment O-17-3. The RDEIR concludes that Goleta Water District will have sufficient water to meet demand related to development under the 2010 LRDP along with other growth in the service area. The RDEIR identifies purchase of SWP supplies as mitigation for the LRDP’s potential impact on water supply should the District’s supplies be insufficient. The mitigation measures proposed in the RDEIR are sufficient to reduce the level of the LRDP’s impact on potable water supplies in the District to a less-than-significant level. See RDEIR, pp. 4.14-34 to -35; Master Response - Water Supply, section VI; see also Response to Comment I-5-46A[45]. For a more detailed discussion of the EIR’s conclusions, please see Master Response - Water Supply, section II. Regarding the reliability of State Water Project deliveries, please see Master Response - Water Supply, section IV.B.

Response to Comment O-17-4. A. The analysis of cumulative transportation impacts is on pages 4.13-70, 71, and 72 of the recirculated EIR Transportation Section. The traffic analysis assumes full buildout of the Goleta General Plan, the Isla Vista Master Plan, and other relevant unincorporated areas of the County. It thus accounts for all existing and future projects that may be accommodated under the relevant land use plans. The model’s base year estimations includes those projects which were known at the time of the Notice of Preparation for the LRDP EIR.

B. The traffic model includes trips to and from campus. Please see the discussion beginning on RDEIR page 4.13-62 for detailed information.

C. Please see responses to comments R-4-19, A-12-48 and A-13-1 regarding alternative transportation planning. See also EIR page 4-13-36 for a list of programs the University already manages.

D. The traffic model used in the RDEIR’s analysis derives its future traffic volumes from land use plans and existing travel patterns, not employment projections. It assumes full buildout of all the relevant land use plans, and then calculates the number of vehicle trips based on the resulting population. RDEIR at 4.13-70. Because any population growth—including growth induced by development under the LRDP—would need to be accommodated under the existing plans, estimates based on the plans represent the maximum available growth. Thus, while the RDEIR’s discussion of population and housing impacts does discuss induced growth, this discussion is not relevant to its traffic analysis.

E. Please see response to comment O-17-4D.

F. The RDEIR includes a thorough discussion of climate change impacts and related information, including the contribution to greenhouse gas emissions made by project-related vehicle trips. RDEIR at 4.2-58 through 59.
June 22, 2008

Tye Simpson, Director
Office of Campus Planning and Design
University of California at Santa Barbara
Santa Barbara, CA  93106-1030

SUBJECT:   GSMC comments on UCSB’s Draft Vision 2025 Long Range Development Plan and Draft EIR

Dear Tye:

On behalf of the Goleta Slough Management Committee, I offer the following comments on the Vision 2025 LRDP and associated Draft Environmental Impact Report. As you know, the Goleta Slough Management Committee was established in 1991 and has worked cooperatively with regulatory agencies, property owners and public interest groups to provide for a healthy Goleta Slough. GSMC continues to identify and resolve issues related to management of the Goleta Slough Ecosystem Management Area and serves in an advisory capacity to lead agencies (e.g., City, County, Coastal Commission and UC Regents).

Comments on LRDP:

1. **Open Space and ESHA land uses** – In Sections B and D of the LRDP, the acreages and percentages of open space, ESHAs and Coal Oil Point Reserve are given, though different land use categories are used in each table. This makes it difficult to determine the existing and proposed acreage of land that will be permanently protected in some way as either open space or ESHA. Please change one or both tables to be clear what the change in acreage, if any, will be. This has a bearing on potential impacts to those sensitive resources with the proposed addition of 5,000 students and about 1,700 faculty and staff.

2. **Change to impervious surfaces and footprints of new buildings** – Given the amount of new construction anticipated, information that needs to be provided, at least in general terms, is the change to impervious surfaces as this affects runoff, water quality, biological resources and other important resources. Footprints of new buildings, or at least building envelopes, should also be provided to help assess possible impacts. Without knowing more specifically how much pervious space is being replaced with impervious buildings and paving, the extent of impacts cannot be addressed accurately as required by CEQA.

3. **Phelps/Mesa connection and DFG property** – Figure E.1 shows proposed circulation changes in a very general manner. Figure 4.13-7 in the DEIR labels the connection between Phelps and Mesa Road though the reader wouldn’t know this connection is planned based on Figure E.1. This is an important aspect of the plan that needs to be clarified in the LRDP. The Goleta Slough Mgmt Committee has had many discussions over the years about a possible connection between these two roads as it relates to the western Fish and Game parcel that is part of the Goleta Slough Ecological Reserve. Previously, an access easement was deemed to be necessary to connect these two roads and DFG had indicated they were not interested in granting the easement given expected impacts to the wetland. The reader has no way of knowing whether the DFG parcel and resources would be affected by the road connection. We understand that the road connection has not been designed, but more information is necessary in order to assess potential impacts to wetlands.
4. **Tidal gates and restoration of tidal circulation to west of Slough** – The previous LRDP contained reference to Policy 30240(a).14 which requires UCSB to work with the City of Santa Barbara to allow tidal influx from the Goleta Slough to the Storke Wetlands. We did not find any mention of the existing tidal gates that were installed by Thomas Storke some 55 years ago to prevent salt water to extend to and beyond Los Carneros Road (where his cows were grazing). The Airport is nearing completion of a 3-year Tidal Circulation Study, the preliminary results of which indicate that restoring tidal circulation to the Slough and adjacent areas is feasible and does not increase the risk of bird strikes. The LRDP and DEIR must provide for the possibility of the removal of the tide gates and restoration of tidal circulation to the Storke Campus Wetlands and two DFG parcels that straddle Los Carneros Road. This is a high priority of the GSMC and would greatly enhance the quality of wetland habitats in and around the Slough.

5. **Retention of 1990 LRDP policies re protection and enhancement** – We note that there are several key policies in the 1990 LRDP relating to protection and enhancement of wetland and other biological habitats and water quality on campus (e.g., Storke Wetlands) and immediately adjacent areas (e.g., Goleta Slough). Two examples are Policies 20340(b).9 and .10 relating to building setbacks and other development standards in the vicinity of Storke wetlands. Given that Storke Wetlands and the adjacent Goleta Slough are inextricably tied together, any mention of Storke should also mention the Slough. Inclusion of these policies in the LRDP would help to mitigate impacts to wetlands that surround much of the campus.

**Comments on Draft EIR:**

**General:**

6. **Mapping errors** – A few errors were found throughout the documents including locating the Goleta Slough to the west of Storke Road on Figure 4.7-1 in the DEIR and indicating that the Airport is in the City of Goleta in Figure 4.7-2. These errors may also be in the LRDP.

7. **Assessment of impacts to Goleta Slough** – As you know, the Goleta Slough, located immediately north of the campus, is part of the state Ecological Reserve System and is a very important wetland. We feel strongly that the LRDP and DEIR do not give careful enough consideration to this important coastal resource. The DEIR tends to treat UCSB’s property as an island rather than a large holding surrounded by sensitive resources under the ownership and jurisdiction of other entities. In virtually all cases, where potential impacts to Storke Campus Wetlands are assessed, the impacts to the Goleta Slough should also be assessed. The break line between the Devereux and Goleta Slough watersheds should be shown on all maps that involve drainage and related impacts.

8. **Status of previous mitigation measures** – UCSB’s earlier LRDPs had many mitigation measures that related directly and indirectly to wetlands, hydrology and other potential impacts to the Goleta Slough and other ESHAs. We would like the EIR to include a table that lists all mitigation measures, including those required for individual projects that followed LRDP approval in 1990, and the status of the mitigation. This information would be helpful to show the progress you’ve made in terms of protecting resources, and also would avoid “double counting” mitigation measures, i.e., having them apply a second time. Obviously mitigations such as using Best Management Practices would be carried forward to the new LRDP, but there may be one-time mitigations that still need to be completed.

4.3 **Biology**

9. **Impacts to aquatic and wetland resources remain significant** – First of all, Mitigation BIO-1A (p. 4.3-30) lists permitting agencies that would review projects that involve wetlands. This is not mitigation as those agencies could approve any number of project features that may or may not protect aquatic and wetland resources. Given the amount of development and redevelopment proposed in the LRDP, we do not see how these four mitigations would reduce the Impact BIO-1 to a level of insignificance. Three of these impacts relate to temporal construction impacts and only one (BIO-1D) addresses long-term impacts. That mitigation would allow development within 100 feet of aquatic resources with “design features to minimize the effect of….. on the adjacent aquatic resource.” We do not believe this constitutes short-term or long-term mitigation of this significant impact.
One way that impacts to aquatic and wetland resources would be reduced is if the University devoted a full-time person to monitor impacts on birds, wetlands, aquatic habitats and other ESHAs and make recommendations to improve these habitats.

Another valuable mitigation would be the abandonment of the sewer lines in Storke Wetlands. While the lines might be able to be abandoned in place, the elevated manholes are detrimental to the visual and biological resources in the area and should be removed once the lines have been replaced along Mesa Rd.

10. **Paved road connection from East Storke wetland area to Los Carneros** - An impact that is not addressed is the proposed paving of an unpaved road from the south side of East Storke Wetland to Los Carneros (see Figure 3-11 in the LRDP). That area has considerable wetland resources and this road and the resulting increase in human activity would have a detrimental impact on the resources. This is, at a minimum, a Class II impact requiring mitigation.

11. **Sensitive Species** – Table 4.3-1 needs to include Santa Barbara honeysuckle, which is found on the North Campus. Figure 4.3-2 is missing sites for several sensitive species at COPR: Tidewater goby shown only at the northern boundary where Devereux Creek enters the slough, while the species was recently found in Tecolotito Creek. Santa Barbara honeysuckle and Ventura milk vetch are not shown on the map. California Least Tern nesting/roosting sites (endangered species) are not shown. The text/tables and figures should be consistent. Parish’s glasswort is a Species of Local Concern, located at COPR, and not mentioned. The only populations are disturbed by trails, and proposed trail improvements should reduce impacts to the populations.

In terms of potential impacts, increased recreational use as the campus population increases would be expected to exert pressure on these sensitive wildlife species. Even without direct impacts to wetlands such as Francisco Torres (Santa Catalina) wetlands and the Devereux Slough fingers, these areas should be restored to enhance their wildlife habitat values as adjacent open space is developed. However, restoration plans should be included in LRDP goals, with timetables associated with development of adjacent areas.

12. **Wildlife Resources** – On p. 4.3-12, the DEIR states that California quail are located on the campus. In fact, according to Paul Lehman, California quail disappeared from the UCSB campus in 1985 or 1986 and from Coal Oil Point Reserve in 1988. Mr. Lehman attributed declines in the coastal areas to development, drought and increased predation. In the past few years, breeding has resumed on the North Bluff and COPR, possibly associated with habitat restoration of these areas. Increased human activity associated with the revised LRDP could jeopardize these gains and general wildlife habitat of adjacent natural areas, which could result in significant impacts. It is also recommended that enhancement of campus natural areas be a goal of the LRDP.

13. **Impacts to DFG wetlands from Phelps/Mesa connection** – See comment #3 under LRDP above.

14. **Widening of Mesa Road** – Policy Trans-8 provides for the widening of Mesa Road adjacent to the Slough and Storke Wetlands, yet we find no discussion of this proposal which could impact Storke and Goleta Slough wetlands directly (through the widening) and indirectly (through the introduction of more cars, pedestrians and bicycles into these sensitive areas).

15. **Policy ACC-5** – This policy in the LRDP provides for an increased trail network which, in concept, we support. However, the Goleta Slough is a sensitive environment (and part of a municipal airport site with safety and security concerns) and increased public access is inappropriate and ill advised.

4.7 **Hydrology and Water Quality**

16. **Change in impervious surfaces and drainage** – It is difficult to ascertain the changes in impervious surfaces, especially in relation to existing and proposed future drainage patterns and resulting potential impacts. On p. 4.7-8, a 1992 drainage system evaluation is cited which seems extremely outdated given the changes on campus since that time. This study should be updated and consideration given to all adjacent wetland areas, including the Goleta Slough.
The LRDP and EIR are also vague in terms of where the increased runoff would be directed and whether it would be effective cleaned before it enters a watercourse or ESHA.

17. **Erosion and Sedimentation and Fill Policies and Impacts** – These policies, starting on p. 4.7-26, should all reference the Goleta Slough as well as Devereux and other wetlands in terms of mitigation. Sedimentation is a major issue for Goleta Slough and it is not addressed adequately in the EIR.

18. **LRDP Impact HYD-2 and mitigations** – Given the amount of construction assumed in the LRDP and the acknowledged increase in impervious surfaces (p. 4.7-28), we do not agree that the two mitigations suggested (HYD-2A and -2B) are sufficient to conclude that the residual impact is less than significant. The language of the two mitigations (e.g., “Technologies selected shall reduce particulate matter”) are vague. Also, no mention is made of employing Best Management Practices.

19. **Impact HYD-4 remains significant** – This impact acknowledges that the construction proposed “would increase the volume and velocity of surface runoff which in turn could result in erosion or flooding on-off site.” The flooding impact is considered less than significant which is not supported by the information provided and would be significant but possibly subject to mitigation. The erosion impact is stated to be mitigated by the HYD-2 mitigations discussed immediately above. We respectfully disagree and believe this impact remains significant.

20. **Runoff filtration devices** – Policy ERO-16m (see p. 4.7-29) states that “Runoff from parking areas and from Mesa Road on the Main Campus shall be directed to drainage structures. Traps and filters for roadway and parking lot contaminants shall be provided as part of the drainage structures.” How are “drainage structures” defined and what sort of traps are proposed? There are many elaborate filtration systems on the market and maintenance is always an issue. We are not advocating for a particular type of filtration system but the best available, including periodic maintenance. As written, this policy isn’t adequate to mitigate the impacts cited.

21. **Significance of hydrology-related impacts** – We do not believe that adequate mitigation is provided to reduce the hydrology impacts to a level of insignificance. While we understand that BMPs that will exist in 2025 are not presently known, the mitigations are too vague and unenforceable to be effective.

4.15 - **Wastewater**

22. **Removal of sewer lines in Storke Wetland** – GSMC has long advocated for the removal of existing sewer lines in Storke Wetland. We cannot tell if this improvement is assumed in the LRDP and its potential impacts (including beneficial effects) are assessed.

Thank you for the opportunity to comment on these important documents.

Sincerely,

Pat Saley, AICP
Goleta Slough Management Committee
Response to Comment O-18-1. As noted on EIR page 3.0-31 and page D.3 of the LRDP, there are 446 acres of open space proposed on campus lands. Three-hundred and one of those acres are proposed for the ESHA overlay. The remaining acreage would include recreation, buffer space, recreational facilities, and other supporting uses. The land use figures on LRDP page B.7 describe current, not proposed, uses.

Response to Comment O-18-2. Specific environmental questions such as the amount of new impervious surface projected under the 2010 LRDP are addressed in the DEIR. As a planning tool, the LRDP is not designed to include specific site plans of the facilities it proposes. The impacts of impervious surface space are discussed in Impacts HYD-2 and HYD-3.

Response to Comment O-18-3. Figure E.1 shows vehicular improvements on campus property and does not show the proposed connection, since it would technically involve off-campus property. The potential Phelps/Mesa Road connection is discussed on page E.5 of the LRDP.

The potential impacts of the LRDP on wetlands, including any such impacts related to the Phelps/Mesa connection, are addressed in the discussion of Impact BIO-1, starting at DEIR page 4.3-30. Mitigation Measure BIO-1D, which includes particular protections for any development within 100 feet of aquatic resources, would prevent significant impacts to any wetlands in the vicinity of the Phelps/Mesa connection. Moreover, the construction of this improvement would be subject to project-level environmental review; if California Department of Fish and Game approval is needed to complete this improvement, then DFG would be a responsible agency.

Response to Comment O-18-4. The following mitigation measure has been added:

LRDP Mitigation BIO-1E: The University shall work with the City of Santa Barbara and West Goleta Sanitary District to reintroduce tidal influx to the Storke Wetlands.

Response to Comment O-18-5. The EIR’s mitigation measures protect all aquatic resources that may be affected by development under the LRDP. They achieve this directly, by placing requirements on any project that may impact any aquatic resource (e.g., Mitigation BIO-1C and 1D), and indirectly, by protecting aquatic resources, such as Storke Wetlands, that are, as the commenter notes, hydrologically and ecologically connected to other resources, such as Goleta Slough.

For information regarding the Wetlands Restoration and Management Plan, please see response to comment O-12-2.

Response to Comment O-18-6. Goleta Slough is not located to the west of Storke Road in Figure 4.7-1. The discrepancy regarding the airport in the City of Goleta is noted.

Response to Comment O-18-7. The DEIR includes the Goleta Slough as part of the study area (p. 4.7-2), discusses the environmental setting of Goleta Slough, including its geographic relation to the University (pp. 4.7-3--5), mentions the Storke Wetlands-Goleta Slough connectivity (p. 4.7-4), and addresses the Slough’s surface water quality (p. 4.7-14--16), the functionality of the Slough in relation to drainage basins (pp. 4.7-7--
9), flooding (4.7-12), and acknowledges the regulatory oversight of the Slough (4.7-19). In addition, the impacts to the Slough are analyzed in the discussion of Impacts HYD-1, 3, 4, 5, and 6, DEIR Section 4.7. For these reasons, the actual contents of the DEIR do not “tend[] to treat UCSB’s property as an island rather than a large holding surrounded by sensitive resources,” as the commenter asserts. Instead, both the LRDP and the DEIR include general and detailed discussions regarding the sensitive resources in the area.

Response to Comment O-18-8. Please see subsection 2.7 of the DEIR (p. 2.0-4), which summarizes the mitigation for the LRDP. The 2010 LRDP does not re-adopt the policies of the 1990 LRDP or the associated mitigation measures but uses, modifies, or adds to those policies were they remain relevant, achieve the same general goals of improving the Campus and its sustainability, and are required to achieve consistency with the Coastal Act. To these ends, many of the current LRDP policies are effectively continuations of previous policies and mitigation measures.

At the same time, the EIR analyzes the Project’s impacts on current conditions as they exist “on the ground.” Thus, the EIR does not assume that 1990 LRDP mitigations have been completed; it simply considers the current environment, including any aspects of that environment related to ongoing mitigation measures, and analyzes the potential impacts of growth and development under the 2010 LRDP.

Response to Comment O-18-9. The LRDP describes applicable regulatory requirements in the Setting sections. In some cases, compliance with environmental regulations has the effect of preemptively avoiding potentially significant impacts. It is assumed that the University will comply with applicable laws and regulations. In addition, the LRDP contains policies that will lessen or avoid potentially significant environmental effects. Hence, LRDP activities are subject not only to the adopted mitigation measures identified in the EIR (e.g., Mitigation Measures BIO-1A through BIO-1D) but also to all applicable environmental laws and regulations and to the policies included in the LRDP (e.g., policies ESH-1 through ESH-30). ESH policies include many measures that would reduce biological impacts, such as protection for trees and roosting habitat, prohibition of disruptive activities in sensitive areas, native grassland replacement, building footprint restriction and setback requirements (LRDP, pages F.9-10). Measures BIO-1A through BIO-1D not only require compliance with permitting agencies, but also various planning, monitoring, and program measures for minimizing impacts to aquatic resources. In addition to these measures, the following measures have been added:

**LRDP Mitigation BIO-1E:** The University shall work with the City of Santa Barbara and West Goleta Sanitary District to reintroduce tidal influx to the Storke Wetlands.

**LRDP Mitigation BIO-1F:** In areas which are not already developed, plans for development within 100-feet of aquatic resources, such as wetlands, shall prohibit pathways in excess of two multi-use lanes, and filling, dredging, grading, and planting of turf or non-native species, recreations fields, or automobile roads.

**LRDP Mitigation BIO-1G:** The University shall provide support for the continuation of the Devereux Slough Monitoring Program (DSMP), in accordance with the Wetlands Restoration Management Plan (WRMP). This may include funding to ensure the continuation of long-term data collection at the time of development of adjacent University property to the applicable wetland areas.
The LRDP has been changed to add the following test on page D.16, at the end of the “UTILITIES” section:

The University shall work with the Goleta West Sanitary District to relocate sewer lines currently located in, or under, the Storke Wetlands.

Response to Comment O-18-10. Because the LRDP is a long-range plan (2025 buildout), specific projects are not discussed in detail. The potential impact of paving an unpaved road would be addressed through implementation of Mitigation Measures HYD-2A, HYD-2B, and any other applicable project-specific mitigation measures adopted at the time a specific project is approved. Please see the discussion of Impact HYD-2, DEIR Section 4.7, which discusses the conversion of permeable surfaces to impermeable surfaces and applicable policies and regulations outlined in the EIR and LRDP.

Response to Comment O-18-11. A. Table 4.3-1 includes Santa Barbara honeysuckle in its list of North Campus species. The more recent sighting of tidewater goby is noted. The presence of the Santa Barbara honeysuckle, the Ventura milk vetch, and the California Least Tern nesting site is disclosed in Table 4.3-1, and the Santa Barbara honeysuckle is displayed in Figure 4.3-2. DEIR page 4.3-17 and 4.3-21 have been amended to note the presence of the Ventura milk vetch, California Least Tern, and Parish’s glasswort.

DEIR Figure 4.3-1 shows general habitat areas, such as oak woodland, while DEIR Figure 4.3-2 shows more specific sensitive resources. Mapping of biologically sensitive areas and resources was based on numerous surveys performed by biologists from 2006 to 2007 for preparation of the Biology Section, as noted on page 4.3-30 of the DEIR. The LRDP and EIR maps are based on the results of these surveys.

Individual projects will be subject to all relevant mitigation and regulation, including Mitigation Measure BIO-2A, which requires avoidance of sensitive plant species.

B. Impacts related to recreational use of sensitive environments are addressed by policies throughout the LRDP such as Trans-7, 9, 10, 11, 12 (LRDP, p. E.11) and ACC-2 (LRDP, p. E.12). Wherever policies encouraging recreation and environmental protection conflict, protection and restoration of environmental resources take priority. For example, recreational access would be restricted where it will adversely impact sensitive resources pursuant to LRDP policy Trans-10. Restoration of wetlands is addressed by policies ESH-1 through ESH-30.

Response to Comment O-18-12. Comments regarding the temporary disappearance of the California quail are noted. Several LRDP policies, including ESH- 6,7,8, 23, and 24, protect sensitive habitats from the impacts of increased human activity. The DEIR, moreover, considers and mitigates for both direct and indirect impacts on wetlands and other aquatic resources (DEIR at 4.3-30 -38). These impacts include runoff, contaminants, and increased noise, lighting, and automotive and foot traffic.


Response to Comment O-18-15. Where specific public access projects would significantly impact sensitive resources, public access will be limited or restricted. LRDP policy Trans-10 subjects public access projects to environmental considerations, and policy ESH 10 specifically states that there “shall be no pedestrian trail construction on the Goleta Slough bluffs and bluff-tops that are designated as ESHA and ESHA Open Space Buffer north of Mesa Road.” Please refer to response to comment O-18-11B for more information.

Response to Comment O-18-16. Due to the programmatic nature of the LRDP, specific building footprints and surface areas of individual projects is impossible to determine. However, as required by Mitigation
Measure HYD-1A (EIR, p. 4.7-25), all projects will prepare Storm Water Pollution Prevention Plans, and subsequent projects will take into account adjacent development with the preparation of such documents.

The EIR's analysis relies on several sources more recent than the 1992 study mentioned by the commenter. Please see subsection 4.7.3 for a list of other consulted studies.

**Response to Comment O-18-17.** The discussion in Impact HYD-1 addresses Goleta Slough specifically, as is shown on page 4.7-27:

> The discharge of pollutants from construction sites could result in significant adverse impacts to the water quality of campus drainages, and may also result in significant short-term water quality impacts to the Devereux Slough, Goleta Slough, Campus Lagoon and the ocean. Storm water discharges from the northern portion of the Campus that drain to the Goleta Slough, which is listed as a water quality limited segment by the 2002 Clean Water Act 303.d list, would have the potential to further contribute to the impairment of the water quality of the Slough. In sufficient quantities, pollutants could also affect ground water on the West Campus, which is an important component of the surface flows of Devereux Slough.

Regarding the LRDP policies which are quoted in the impact discussion, they include all campus construction and potential impacts to all nearby water bodies, including Goleta and Devereux Sloughs and other wetlands. Impact HYD-1 also addresses erosion and sedimentation from construction, making reference to LRDP policies ERO-1 through ERO-16 and FIL-1 and 2. Please see responses to comments O-18-5 and O-18-7.

**Response to Comment O-18-18.** The commenter does not specify why Mitigation Measure HYD-2A and HYD-2B may be inadequate except to state that the language is vague. Please see response to comment O-18-10. The EIR refers to the use of Best Management Practices throughout the Hydrology Section (see pp. 4.7-27 -31, 39, 43). For examples of successful past implementation of BMPs, please see response to comment A-17-PD-29.

**Response to Comment O-18-19.** Please refer to response to comment O-18-18.

**Response to Comment O-18-20.** LRDP policies, such as ERO-16(m), are general guidance and are not intended to direct the particular application of mitigation measures to specific projects. Similarly, Mitigation Measure HYD-2A (DEIR at 4.7-30) calls for the use of treatment devices for runoff, but provides a performance standard and allows the specific technology to be determined on a project-by-project basis. The DEIR concludes that this, in combination with other identified mitigation measures, would be sufficient to reduce runoff-related impacts to a less than significant level.

Response to comment A-17-PD-29 describes potential filtration devices.

**Response to Comment O-18-21.** Hydrology-related mitigations are fully enforceable through the implementation of SWMPs and SWPPPs which shall be prepared as individual projects are proposed.

**Response to Comment O-18-22.** The removal and/or replacement of old, inadequate, and/or damaged sewer lines is assumed as part of the impact analysis (p. 4.7-32).
From: Freddie Romero [mailto:freddyromero1959@yahoo.com]
Sent: Tuesday, July 01, 2008 12:34 PM
To: UCSB Vision2025
Subject: Re: LRDP Update

Thank you for your response to my e-mail. These areas where you are proposing to construct housing and parking are of a sensitive nature to the Chumash people. If we could get more info on the exact location or view development plans, it would be much appreciated. I went to the website and it was limited in that type of info. We would also like to review the EIR's for these projects. I'm not sure if UCSB plans to have additional meetings for these projects, if so, we would like to be notified. I'm not sure if any federal funding is to be used for the construction of the projects, all or partial, if so that would require consultation with us as being a federally recognized tribe. I would appreciate if you could get back to me.

Freddie Romero
Cultural Preservation Consultant
SYBCI Tribal Elders Rep.
P.O. Box 365
Santa Ynez, Calif. 93460
(805) 688-7997 x37
(805) 403-2873
Response to Comment O-19-1. The archaeological impacts of the LRDP were analyzed at a program level and determined to be significant. An extensive set of mitigations, reproduced below, were identified in the EIR to ensure that archeological resources are not adversely affected by the 2010 LRDP.

**LRDP Mitigation CULT-1A:**

The University shall define the project APE and direct impact areas as early as possible in the planning process.

The University shall review the Treatment Plan and sensitivity maps and determine whether a recent intensive survey has been conducted within the APE and whether any previously recorded cultural resources have been identified.

**LRDP Mitigation CULT-1B:**

No prior survey - the University will contact a qualified archaeologist to complete an intensive surface survey prior to any earth-moving activities.

If the project area is in a Moderate/High sensitivity zone for buried resources (as identified in Figure 4.4-3), a professional archaeologist shall assess the need for “subsurface survey” through backhoe excavation or coring.

**LRDP Mitigation CULT-1C:**

No cultural surface or subsurface deposits present or identified during survey - prepare a short Negative Archaeological Survey Report; no further management.

**LRDP Mitigation CULT-1D:**

Archaeological sites identified – prepare survey report, including background research, project context, descriptions of fieldwork, appropriate maps and photos, site records (Department of Parks and Recreation Form 523), and management recommendations (avoidance, or test excavations to determine presence/absence and eligibility).

All new data will be integrated into the University GIS database using their protocols, and reports will be submitted by the professional archaeologist to the Central Coast Information Center.²

**LRDP Mitigation CULT-1E:**

Avoidance is not possible - a qualified archaeologist will conduct minimal, initial test excavations to determine presence/absence of intact deposit within the impact area, following guidelines in Treatment Plan. A Native American monitor must be present.

**LRDP Mitigation CULT-1F:**

Impact area has no significant resources present - remaining site areas shall be fenced for protection, with no additional management.

**LRDP Mitigation CULT-1G:**

Potentially eligible resources are identified within the impact area - expand test excavations to determine California Register eligibility and CEQA significance.

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² GIS protocol and report submission to the Central Coast Information Center shall be standard policy for all investigations (survey, testing, data recovery).
following guidelines in Treatment Plan. A Native American monitor must be present.

**LRDP MitigationCULT-1H:** Document findings in a test excavation report, detailing site integrity and evaluation criteria.

**LRDP MitigationCULT-1I:** Resource is ineligible - no further management is required.

**LRDP MitigationCULT-1J:** Resource is eligible and cannot be completely avoided by project redesign - implement data recovery measures, following the Treatment Plan. A Native American monitor must be present.

**LRDP MitigationCULT-1K:** Project can proceed unless data recovery efforts do not capture “unique” characteristics of the resource – implement project redesign, placement of fill, project relocation or abandonment.

**LRDP MitigationCULT-1L:** Present short training session for construction crews in the identification of archaeological remains and awareness of Native American concerns.

**LRDP MitigationCULT-1M:** If archaeological materials are discovered during project construction, work should halt immediately halt within 100 feet of the find, and a qualified archaeologist should be contacted to verify the nature of the find (go to CULT 1E-1H)

As listed on pages 4.4-12 and 13 of the DEIR, there were 28 sites of cultural significance found in and immediately around campus. In any case, pre-construction surveys will be performed on a project-by-project basis. In addition, the LRDP includes policies for the reduction of archeological impacts. Please see pages 4.4-25 through 34 for more information.

Moreover, future development projects under the 2010 LRDP will be subject to environmental review and the accompanying public processes.
June 23, 2008

Ms. Alissa Hummer  
Campus Planning & Design  
Facilities Management  
c/o UCSB Vision 2025  
UC Santa Barbara, CA 93106-1030

By Email to  
alissa.hummer@planning.ucsb.edu

RE: Traffic Impact Assessment in the UC Santa Barbara LRDP Draft EIR

Dear Ms. Hummer:

This office represents the Storke Ranch Master Owners Association (SRMOA). We reviewed the Draft Environmental Impact Report (EIR) for UC Santa Barbara Long Range Development Plan (LRDP or Project) and find it to be materially flawed. Specifically the EIR lacks information essential to the analysis of Project impacts along Phelps and Mesa Roads. There are significant impacts associated with the proposed connection of these roads including traffic/circulation, air quality, noise and environmental justice impacts, which must be analyzed in a recirculated environmental review document. Alternatively, the proposed connection should be eliminated from the LRDP and determined to be an infeasible mitigation measure in the EIR.

As demonstrated in the EIR, the proposed roadway improvements including the Phelps/Mesa Road connection do not reduce the LRDP’s significant traffic impacts to insignificance. More effective mechanisms exist for addressing UCSB’s traffic impacts than merely expanding the capacity of periphery roadways, for example enhancing the public transit system servicing West Goleta to include more routes and more frequent service to UCSB. The County has already demonstrated the feasibility of similar transit improvements in the context of the Camino Real Specific Plan. The transit alternative is a more effective and sustainable long-term solution to UCSB’s traffic impacts and must be considered in lieu of ineffective improvements which introduce unacceptable levels of traffic in residential areas. A condition of the Storke Ranch development and as provided for in an agreement between the SRMOA and the Regents, the use of the Phelps/Mesa Road connection is limited to emergency use only. Normal ingress and egress on this road is prohibited by a binding agreement entered into by the Regents.

Additionally, the size and scale of the Project, including the number of students, faculty and staff, and the size and nature of the proposed physical improvements may simply exceed the carrying capacity of the area’s present and proposed future infrastructure and cause impacts that...
overwhelm the local ecology. Located near sensitive lands, including wetlands, the UCSB campus can only grow to a certain size.

1. Inconsistent Pagination between Online and DVD Versions of the DEIR

UCSB released the DEIR in several formats including online at www.ucsbvision2025.com and on DVD. Unfortunately the pagination of these documents is inconsistent between these two formats. This error confounds the public comment process and must be revised to ensure consistency in a revised EIR. Page references in this comment letter correlate with the pagination in the individual EIR sections posted online at the above web address.

2. The EIR Omits Significant Information, Avoids Essential Analysis, and Presents Inconsistent Data

"The purpose of an environmental impact report is to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment[.]") Public Resources Code § 21061. "[A] paramount consideration is the right of the public to be informed in such a way that it can intelligently weigh the environmental consequences of any contemplated action and have an appropriate voice in formulation of any decision." Environmental Planning and Information Council v. County of El Dorado (1982) 131 Cal. App. 3d 350, 354. The LRDP EIR omits crucial information necessary to evaluate the likely effect of the proposed Project on the environment and deprives the public of their right to intelligently weigh and comment upon the environmental consequences of the Project.

a. Travel Forecasts Questionable

As discussed at length by the City of Goleta in their comment letter, the EIR used the City of Goleta’ calibrated traffic model as a basis for its Traffic Model, but modified that model with a series of undisclosed\(^1\) and potentially questionable assumptions without further calibration. The application of these assumptions create significant land use discrepancies between the DEIR’s modeling and the Goleta’s 2005 baseline for all three land use categories bearing on UCSB’s travel demands: students, faculty/staff and the number of dwelling units. These assumptions also generate discrepancies with UCSB’s own Campus Profile figures. The City of Goleta’s draft comment letter articulates this issue as follows:

\(^1\) City of Goleta Staff received a Memorandum from the University the week prior to the public comment deadline, which described certain assumptions underlying the Traffic Model. This information should have been included in the EIR and providing the information to select entities at the 11th hour deprives the public of the opportunity to evaluate the Traffic Model’s adequacy. We have requested an extension to the comment deadline and disclosure of all information regarding the Traffic analysis. Further the EIR must be revised to include this critically important of information.
The LRDP No-Project and the LRDP Final modeled land use assumptions reflect roughly half the UCSB employment and roughly 3,000-5,000 less enrolled students than the City’s 2005 baseline and UCSB’s own 2006-07 Campus Profile figures. Hence, UCSB’s LRDP travel model developed for the estimation of LRDP travel impacts is inconsistent with like data reported in both the LRDP and DEIR and by UCSB itself. As such the travel forecasts generated by the LRDP traffic model may underestimate both future traffic volumes associated with the LRDP and associated traffic impacts.

The LRDP No-Project and Final model land use assumptions reflect roughly 5,000 and 12,000 more dwelling units than the City’s 2005 baseline and General Plan assumptions respectively. The LRDP model estimate of dwelling units equate to occupancy of 1.55 and 1.19 students/UCSB employees per dwelling unit for current and future conditions respectively. This does not appear to be a reasonable accounting of baseline or future dwelling units related to UCSB affiliated housing.

Given the aforementioned land use assumption discrepancies, travel forecasts based on these land use assumptions are questionable. The cited land use discrepancies require explanation and documentation in the DEIR.

The substantial discrepancies identified by the City of Goleta call the accuracy of the entire traffic analysis into question. UCSB must disclose all assumptions underlying its traffic model in a revised EIR so that the public and decisionmakers may evaluate the reasonableness of those assumptions. By separate letter, SRMOA requests extension of the comment period and access to all such information for public review and analysis of this highly relevant information.

b. No Evaluation of Traffic Impacts to the Bayberry Lane/Phelps Road Intersection

The traffic/circulation analysis omitted crucial information necessary for evaluating the effect that opening Phelps Road to through traffic will have on Storke Ranch residents and their guests’ ability to safely and easily enter and exit the neighborhood. There are only two roads that lead in and out of the Storke Ranch. One of them is Bayberry Lane, which intersects Phelps. Drivers exiting the Storke Ranch neighborhood must yield to through traffic. Despite these constraints the EIR does not evaluate intersection operations or other traffic impacts at Bayberry Lane and Phelps. Discussed below, there are several potential impacts to this intersection that cannot be evaluated without this crucial information.

c. No Data or Evaluation of Peak AM Traffic Flows through Key Intersections Including the Phelps/Storke Intersection

The EIR did not study AM Peak intersection operations at the Phelps/Storke intersection. See Table 4.13, p. 4.13-16. Similarly the EIR did not study Peak AM operations at four other Goleta
intersections, and at 8 of the 9 Santa Barbara County intersections studied during the PM Peak period. *Id.* The EIR and traffic study do not discuss this serious omission. It is simply not possible to analyze the impacts at these intersections without this vital information.

d. Unreliable Counts of Existing Traffic on Phelps

The EIR reported that 2,030 cars per day currently drive down the segment of Phelps road east of Storke. Table 4.13-1, p. 4.13-9. Residents of the Storke Ranch neighborhood thought this number seemed impossibly high, and one resident, Mr. John Dickson, took it upon himself to set up a video camera and film Phelps road for a 24 hour period to get a traffic count. He counted 33 cars. *See* John Dickson testimony, June 4, 2008 LRDP/EIR hearing. The discrepancy between 33 and 2,030 cars is large enough to cast serious doubt on the accuracy of the EIR. Further, conclusions regarding traffic, noise and air quality are all compromised because this traffic count forms the baseline from which these impacts are analyzed.

e. Inconsistent Traffic Estimates at Phelps and Mesa Intersections

The EIR projects a 5,600 [vehicle or ADT] increase in traffic volumes along the easternmost segment of Phelps Road and a 2,600 increase along the westernmost segment of Mesa Road, caused by the proposed roadway improvements including the Phelps/Mesa connection. Table 4.13-39. As noted by traffic engineer Tom Brohard, ‘‘[i]f the daily trips increase by 5,600 at the west end with the connection, then a similar increase can also be expected at the east end. Adding 3,000 more daily trips to the east end may result in further significant traffic impacts at Mesa Road/Los Carneros Road that must be disclosed, evaluated, analyzed, and mitigated in the Draft EIR.’’ Brohard Comment Letter dated May 29, 2008.

f. A Binding Agreement Bars Any But Emergency Access on Phelps/Mesa Roads

The EIR must acknowledge the legal infeasibility of the proposed mitigation measure connecting Phelps and Mesa Roads. In 1998 the predecessors to SRMOA executed an agreement with the Regents delineating specifically permissible uses of the Phelps and Mesa Roads connection:

The Fire Access Road shall be used solely for emergency fire access by the County of Santa Barbara Fire Department, the Santa Barbara County Sheriff and comparable personnel employed by the Regents and serving the UCSB campus (e.g., Campus Police and Fire Department). The Fire Access Road shall not be used of normal ingress and egress. The Fire Access Gate shall remain closed at all times except in case of emergency.

Agreement, Fire Access Road and Gate, 98-078622, 10/13/1998, attached as Exhibit 5, at page 4, ¶ 3. SRMOA is the beneficiary of and successor to that agreement.
Thus the Regents are prohibited under any circumstances from opening the Phelps/Mesa Road connection to traffic and any uses other than bona-fide emergency access. As such, this proposed mitigation measure is legally infeasible and is not appropriate for further consideration as part of this Project.

g. Underestimation of Future Transit Demand

As reported in newspapers around the country, demand for public transit is at historic highs due to ever increasing gas prices. See Exhibit 1. With gas prices expected to continue rising, coupled with increasing awareness of global climate change, demand for public transit is likely to grow significantly by 2025. The EIR does not account for this significant change in circumstances and instead bases projections of future transit demand on obsolete statistics.

h. Failure to Consider Pending Projects in Cumulative Impact Assessment

In the June 4, 2008 hearing on the LRDP and EIR, Ms. Mickey Flacks testified that already approved and in the pipeline projects in Goleta were not considered in the EIR. The EIR includes some pending projects in its evaluation of future traffic volumes (p. 4.13-65), however fails to consider additional pending projects including Gaviota Coast developments (see Exhibit 2) as well as the City of Goleta’s development-oriented General Plan amendments that are intended to substantially increase development in the Goleta Valley. See Exhibit 6. The EIR’s failure to account for all pending projects constitutes a serious omission that undercuts the cumulative impact analysis in various areas including traffic, noise, air quality and water resources.

i. Failure to Collect Sufficient Data on Existing Noise Conditions

The noise study only measured noise levels on Project area roadways for twenty minutes at each location on one day. DEIR p. 4.9-17. Considering that traffic volumes fluctuate dramatically throughout the day, and that night-time noise has a greater impact, one twenty minute measurement of traffic related noise at each location is so woefully inadequate it is nearly meaningless. Inaccuracies in this baseline noise data compromise the impact analysis and the EIR’s conclusions regarding noise impacts. A series of representative and worst-case 24 hour noise surveys conducted by independent and qualified acoustical engineers is required.

j. Failure to Model and Evaluate Noise Impacts along the Phelps/Mesa Roadway Segment

The noise study conducted by Fehr & Peters did not perform modeling of noise impacts along the proposed Phelps to Mesa roadway connection. DEIR, p. 4.9-33. This failure deprives the public of the ability understand how the LRDP and this roadway connection in particular will affect the Storke Ranch and student family housing neighborhoods.
Information contained within the EIR clearly demonstrates the potential for significant noise impact. Specifically, the housing development located on the north side of Phelps is within the 60 Db contour for the airport. See Figures 4.9-1 and 4.9-2. This means residents of this development in particular will be impacted by the cumulative noise environment, because the other developments and activities in this immediate area are outside this contour.

The modeled noise environment must include noise emissions from Harder Stadium during peak use, high traffic periods as during student move in and vacation days, and other periods with higher than usual noise emissions in the region.

3. The Proposed Connection between Phelps and Mesa Roads Causes Significant Unavoidable Environmental Impacts

The easternmost portion of Phelps Road passes through a quiet residential neighborhood, ending in a cul-de-sac. The westernmost portion of Mesa Road passes through UCSB student family housing. The proposed connection of these road segments will vastly increase traffic volumes through these neighborhoods and increase congestion at the Phelps/Storke intersection as well as at the Mesa/Los Carneros intersection. The EIR must acknowledge these significant traffic/circulation impacts. Further, the increased traffic volumes in this area may have significant air quality impacts, particularly considering that multiple sensitive receptor sites including child care and recreational facilities are located along Phelps road. On the North side of Phelps immediately West of the proposed connection point with Mesa Road is a development comprised of 36 affordable family rental units. The development includes space for after school activities, educational and social services programs, and includes a computer learning center which tutors children and adults to become computer literate. Introducing heavy traffic in the immediate vicinity of this development raises environmental justice concerns which must be addressed during environmental review.

a. Traffic and Circulation Impacts

The DEIR identifies four significant impacts associated with increased traffic volumes on City of Goleta and Santa Barbara County roadways. See p. 2.0-30. ‘Traffic-1’ and ‘Traffic-2’ relate to intersection operations resulting in unacceptable LOS conditions under cumulative plus project conditions, and ‘Traffic-3’ and ‘Traffic-4’ relate to roadway operations resulting in unacceptable LOS conditions under cumulative plus project conditions. See pp. 2.0-31-2.0-32. Although the EIR proposes mitigation measures to address these impacts, all four remain significant after mitigation. Moreover, there are additional significant impacts that the EIR did not identify, including intersection operation and safety-related impacts at the Bayberry Lane/Phelps intersection and impacts to the safety of children using Phelps road.
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i. Roadway Segment Operations

Phelps Road, just east of Storke Road is a minor arterial with a daily traffic volume of 2,030.\(^2\) Table 4.13-1, p. 4.13-9. Mesa Road, just west of Los Carneros is also a minor arterial with an existing daily traffic volume of 1,740. \textit{Id.} The proposed connection of Phelps and Mesa roads is projected to increase traffic along the Phelps Road segment to 7,700 cars per day and to increase traffic along the Mesa Road segment to 6,500 cars per day. Table 4.13-39. Although this increase does not exceed the LOS C threshold, "[a] threshold of significance is not conclusive... A public agency cannot apply a threshold of significance or regulatory standard 'in a way that forecloses the consideration of any other substantial evidence showing there may be a significant effect." Mejia \textit{v. City of Los Angeles} (2005) 130 Cal. App. 4th 322, 342 (\textit{quoting Communities for a Better Environment \textit{v. California Resources Agency}} (2002) 103 Cal.App.4th 98, 114). Here, as was the case in Mejia, the presence of additional factors indicate a significant impact on the roadway operations of Phelps is likely. \textit{See Id.}, pp. 340-341.

These additional factors include the presence of a day care center, adult and child learning center, and unfenced playground immediately adjacent to Phelps. Extensive use of the Phelps road by families walking their children to the educational facilities, and by children as an informal playground. Recreational facilities including a pool and tennis courts located immediately adjacent to Phelps, which children and adult residents of Storke Ranch cross Phelps to access. There is also a bike path that crosses Phelps at the proposed connection point. Both Storke Ranch on the Phelps side of the proposed connection, and the UCSB Student Family Housing complex on the Mesa side, are family-oriented residential complexes. The presence of these additional factors along Phelps and Mesa roads and in the immediate vicinity of the proposed connection point generate significant traffic impacts related to safety, discussed below, but also impact roadway operations on Phelps.

ii. Intersection Operations

The signalized intersection of Phelps Road and Storke Road currently operates at a LOS A during the PM Peak period (Table 4.13-8, p. 4.13-16), and projected to 2025 this intersection will still operate at LOS A (p. 4.13-74).\(^3\) The LRDP itself will reduce the operations of this intersection to LOS B. \textit{Id.} With the proposed roadway improvements including the connection of Phelps and Mesa Roads, this intersection will operate at LOS D during the PM Peak period. Table 4.13-33, p. 4.13-78. "The degraded LOS is due to the Phelps/Mesa connection and the additional vehicles that would travel through the Phelps Road/Storke Road intersection." 4.13-74.

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\(^2\) This traffic count may be significantly lower, based on observations of area residents. \textit{See section 2d supra} for further discussion.

\(^3\) The EIR fails to include and analyze traffic volumes during the AM peak hour. As discussed above, the impact analysis is incomplete without this information.
The signalized intersection of Mesa Road and Los Carneros currently operates at a LOS B during the AM peak hour and LOS C during the PM peak hour. Table 4.13-8, p. 4.13-16. Projected to 2025, this intersection is projected to operate at LOS C and the addition of the LRDP reduces the LOS to D. \textit{IId.} With the LRDP and proposed roadway improvements the LOS falls to LOS E. \textit{IId.} The increase in traffic at these intersections is a direct result of the proposed connection between Phelps and Mesa roads. 4.13-85. In the absence of the “mitigation measure” of opening Phelps and Mesa roads, Project impacts to these intersections and roadway segments is not significant.

iii. Unidentified Intersection Impacts

There are additional impacts to intersection operations impacts directly attributable to the connection of Phelps and Mesa Roads that the EIR did not identify. For example, the EIR did not analyze operations at the intersection of Bayberry Lane and Phelps Road. Bayberry Lane is one of only two roads providing entry and egress to Storke Ranch, and exiting Storke Ranch vehicles must yield to traffic on Phelps. The substantial increase in traffic along Phelps Road may cause this intersection to operate at an unacceptable LOS, and this must be evaluated in a revised EIR.

A further impact that the EIR did not identify is the unsafe situation at the Bayberry Lane/Phelps intersection caused by the opening of Phelps road to through traffic. Discussed above, the traffic study did not measure or evaluate operations at this intersection and the substantial increase in traffic along Phelps Road may cause this intersection to operate at an unacceptable LOS. Additionally the County’s thresholds of significance includes the following: “Project access to a major road or arterial road would require a driveway that would create an unsafe situation or a new traffic signal or major revisions to an existing traffic signal.” Santa Barbara County CEQA Thresholds and Guidelines Manual ("CEQA Thresholds Manual"), p. 171. Although Storke Ranch is not the Project at issue, the LRDP Project and proposed mitigation will create an unsafe situation at the intersection of Bayberry and Phelps. This impact is potentially significant and must be evaluated in a revised EIR.

iv. Other Unidentified Impacts

A potentially significant impact that the EIR failed to identify, which was raised repeatedly during the public hearing on the LRDP and EIR on June 4, 2008, is that opening Phelps road to through traffic will significantly impact the safety of children that live, go to school, and play in the immediate area. Under the County CEQA thresholds a Project has a significant impact if it “adds traffic to a roadway that has design features... or receives use which would be incompatible with substantial increases in traffic (e.g. Rural roads... or residential roads with heavy pedestrian or recreational use, etc.) that will become potential safety problems with the addition of project or cumulative traffic.” CEQA Thresholds Manual, p. 171.
The Isla Vista Youth Project Children’s Center is located immediately adjacent to the proposed road connection. At the June 4, 2008 LRDP/EIR hearing LouAnn Miller, the executive director of the Isla Vista Youth Projects who operates the Center in Storke Ranch testified that many parents walk their children to school along Phelps road. She spoke in opposition to the proposed road connection because of its health and safety impacts to families accessing the center on foot and the 100+ kids who use the playground right next to the road. Ms. Miller stated that the playground which is part of the affordable apartment complex has no fence around it and that children frequently play in the street. Numerous Storke Ranch residents also reported at the June 4 hearing that children frequently play in the existing cul-de-sac at the end of Phelps Road. These uses of Phelps Road will become potential safety problems with the addition of project and cumulative traffic. This is a significant impact that must be identified and mitigated in a revised EIR. See CEQA Thresholds Manual, p. 171.

The proposed Phelps/Mesa Road connection also may cause significant impacts to the safety of bicyclists. A bike path crosses Phelps at the proposed connection point. See DEIR Figure 4.13-4A and Exhibit 3. The proposed connection would bisect the bike path and could thereby cause unsafe bicycle-car interactions. The EIR does not analyze the potential impact that connecting Phelps and Mesa roads will have on this bicycle path and the safety of bicyclists who use it. This is a potentially significant impact under CEQA which must be identified in a revised EIR. See CEQA Thresholds Manual, p. 171.

b. Air Quality Impacts

There are two preschools on Phelps road; the Steps to Learning Preschool is located at 6901 Phelps Road, near the intersection of Phelps and Storke, and the Isla Vista Youth Project Children’s Center located at 6842 Phelps Road, near the proposed connection of Phelps Road and Mesa Road. There is also a pool and tennis courts on either side of Phelps Road east of Storke Road. Additionally, both on the Phelps Road and Mesa Road segments are developed with residential units. These childcare and recreational facilities, as well as residential neighborhoods are considered sensitive receptor sites under CEQA. See DEIR p. 4.2-9 and County CEQA Thresholds Manual, p. 27. The EIR demonstrates that the proposed connection between Mesa and Storke Roads will substantially increase traffic along the previously dead-end street. This substantial increase in traffic may result in unacceptable increases in both chronic and toxic exposure to air pollutants from vehicle emissions at these sensitive receptor sites. The EIR must model these emissions and perform a Health Risk Assessment.

c. Noise Impacts

The noise impact analysis in the EIR does not disclose the full extent of noise impacts associated with the Project and proposed mitigation. “Traffic on local streets located in the project area substantially contributes to existing ambient noise conditions.” DEIR p. 4.95. Traffic is currently the largest noise source in the LRDP project area, and is anticipated to be the largest
noise source in the future.” DEIR p. 4.9-26. Notwithstanding that fact, the DEIR failed to collect sufficient data to analyze Project specific and cumulative noise impacts from Project area roadways. As discussed above, the noise study only measured traffic noise for 20 minutes at each location on one day. See section 2h, supra; DEIR p. 4.9-17. This data set is too small to verifiably represent actual noise conditions, and cannot form the basis of any legitimate conclusions regarding baseline conditions against which to quantify the Project’s noise impacts. Further, the noise study did not model anticipated future noise levels along the easternmost portion of Phelps road. DEIR p. 4.9-33. This omission is particularly problematic because of the many noise-sensitive land uses in that area. Before the EIR can reach any conclusions regarding its traffic noise impacts generally, and noise impacts associated with the proposed Phelps/Mesa connection in particular, more data must be collected and analyzed in a revised EIR. Discussed further below, these omissions are of sufficient magnitude to require recirculation of a revised draft to the Public.

Significant cumulative noise impacts to the Storke Ranch and student family housing neighborhoods are likely because of their close proximity to the airport. The low-income housing complex on the North side of Phelps is within the 60 dB contour for airport noise. See Figures 4.9-1 and 4.9-2. The expected increase in traffic noise along Phelps and Mesa roads may push ambient noise levels above the County’s 65 dB CNEL/Ldn threshold. Moreover, anticipated Airport growth, as well as noise impacts from Storke Road and from transit vehicles may contribute substantially to the cumulative noise environment in this area. As the EIR recognizes, “[a]dding any additional traffic noise to a noise impacted area would represent a significant impact.” P. 4.9-28. The exposure of area residents to noise levels exceeding the County’s threshold is a potentially significant impact which must be evaluated in a revised EIR.

Significant noise impacts are more likely in the Storke Ranch area because of its many sensitive noise receptors. Several distinct types of sensitive noise receptors exist on this roadway segment including a daycare center, child and adult learning center, playground, swimming pool, tennis courts as well as residences. CEQA recognizes all of these land uses as sensitive noise receptors for which lower thresholds of significance must be used. Specifically the County CEQA thresholds provide that “a significant effect may also occur when ambient noise levels affecting sensitive noise receptors increase substantially but remain less than 65 dB(A) CNEL, as determined on a case-by-case level.” CEQA Thresholds Manual, p. 132. Therefore even if ambient noise levels near the Phelps/Mesa roadway segment are below the 65 dB threshold, significant impacts may occur because of the numerous sensitive receptors in this area. For this reason, it is imperative that the EIR be revised to model noise impacts along the Phelps/Mesa roadway segment.

d. Environmental Justice

The State of California defines environmental justice as "the fair treatment of people of all races, cultures and incomes with respect to the development, adoption, implementation and
enforcement of environmental laws, regulations and polices." Government Code § 65040.12. Impacts that disproportionately affect certain cultural or economic groups must be analyzed from an environmental justice perspective in an EIR.

A low cost rental-housing complex is located on the North side of Phelps road immediately adjacent to the proposed connection point with Mesa Road. Children from this complex currently utilize the cul-de-sac as a play area. Removal of the cul-de-sac and significant increases in through traffic may have unintended consequences on the residents of this housing complex. Discussed above, the traffic increase threatens the safety of children who play near and on the road, many of whom live in the low cost complex. The complex is already disproportionately exposed to higher noise levels because it is located within the 60 dB noise contour for the airport and the proposed road connection will substantially add to the cumulative noise levels. Further, increased vehicle exhaust may threaten the health of the low income residents, many of whom are sick according to public testimony at the June 4 LRDP/EIR hearing.

These traffic, noise and air quality impacts must be evaluated from an environmental justice perspective. Because opening Phelps Road to through traffic may disproportionately affect residents of the low income housing complex, and will cause a host of other impacts described herein, we strongly urge UCSB to abandon the Phelps/Mesa roadway connection.

4. Feasible Alternatives and Mitigation Measures can Substantially Lessen the Project’s Environmental Impacts

Under CEQA, a Project cannot be approved if there are feasible alternatives or mitigation measures that would substantially lessen the Project’s environmental impacts. Public Resources Code § 21002. The EIR identifies numerous significant environmental impacts including traffic impacts that remain significant after proposed mitigation, however the University failed to consider numerous feasible alternatives and mitigation measures that would resolve these significant impacts. For this reason, among others, the LRDP cannot be approved as currently proposed. UCSB must develop additional alternatives and/or mitigation measures in a revised EIR, and we urge UCSB to explore the numerous creative ideas raised during public comment on this issue.

UCSB faces significant geographic and resource constraints to its expansion. The increase in student and faculty populations proposed in the LRDP pushes UCSB far beyond the carrying capacity of the land, as evidenced by the significant unavoidable traffic and other impacts identified in the EIR. There are various potentially feasible Project alternatives that the EIR failed to consider, which would help resolve this carrying capacity issue and its associated impacts. One example, mentioned at the June 4, 2008 public hearing by Olivia Uribe, the associate director of SBCAN, is that UCSB develop a satellite campus in Santa Maria. Although the EIR considered relocating new development and growth off campus, it only considered lands
in the immediate vicinity of the existing campus. See p. 5.0-2. The Santa Maria satellite alternative would simultaneously further project objectives of the LRDP, reduce traffic and other impacts, and provide a much-needed opportunity for North County residents to attend UCSB closer to home. Additionally, the reduced enrollment alternative considered in the DEIR appears to be feasible and environmentally superior to the proposed Project.

There are also other potentially feasible mitigation measures that would substantially reduce the traffic impacts of UCSB’s LRDP, which the DEIR failed to consider. One mitigation measure, raised during the public hearing on June 4, 2008 and again in the City of Goleta’s comment letter, is that UCSB prohibit freshman and sophomore students from bringing cars to campus. Another mitigation measure suggested by numerous commenters at the public hearing and by Goleta’s City Council is that UCSB conduct a Transit Study, and based on that, develop a transit plan to address Campus traffic impacts. Enhancing public transit in West Goleta is a feasible mitigation measure that would substantially lessen the Project’s traffic-related impacts.

The LRDP’s articulated “overall approach” to vehicular circulation is “build[ing] on the existing peripheral system by... creating new roadway links...” as its LRDP p. E.3. “These additional connections would allow traffic to flow more efficiently by taking pressure off primary campus and community roads and intersections.” Id. Rerouting vehicular traffic to the periphery of the Campus however does not solve UCSB’s traffic problem, and introduces additional significant environmental impacts including those discussed above. As raised by numerous public commenters at the June 4 hearing, UCSB’s articulated approach is outdated and unrepresentative of the innovative university environment.

Rather than degrade existing neighborhoods by introducing campus traffic, UCSB must enhance public transit as a sustainable solution to its traffic problem. The first step is conducting a Transit Study to evaluate the transit needs of the UCSB and Goleta communities. This comprehensive transit plan, developed by independent, qualified transportation planning professionals, should survey existing and predicted travel patterns and evaluate the existing system. UCSB’s traffic is not just students in the immediate area of campus but must incorporate trip origin information for all UCSB-related trips to create a robust and effective transit plan and system. Then based on the results of the Transit Study, UCSB must develop a Transit Plan for enhancing transit service in UCSB and Goleta, working with and providing funding to MTD, the regional transit operator. The Camino Real Specific Plan, adopted by the County Board of Supervisors in 1997 included specific transit improvements to offset the traffic volumes generated by the Camino Real Shopping Center. See Exhibit 4. These improvements were never implemented; however enhanced transit services remain a viable alternative to increasing and improving peripheral streets to accommodate increased auto traffic. With projected demand for public transit much higher today than in 1997 due to increasing gas prices and other factors (see Exhibit 1), systematic and well-planned improvements to West Goleta’s transit system will now be much more effective in reducing vehicular traffic than anticipated in the Camino Real Specific Plan. Given the scale of UCSB’s impacts to the area’s circulation...
infrastructure, and the regional nature of most Santa Barbara County commuting, an integrated planning process is necessary.

Implemented as an alternative to the numerous proposed roadway expansions, including the proposed connection of Phelps/Mesa connection, expanding and integrating West Goleta’s transit service with regional and campus services could eliminate impacts to the Storke/Phelps and Mesa/Los Carneros intersections, as well as eliminate the other traffic-related impacts caused by opening Phelps and Mesa Road to through traffic. This mitigation measure will also reduce overall traffic impacts and provide a tangible benefit to a community currently bearing the brunt of UCSB’s traffic impacts.

As an additional recommendation, also raised by various members of the public at the June 4th hearing, is the imperative for UCSB to utilize its greatest resource, the brainpower of its faculty and students, to create sustainable solutions for coping with UCSB’s growth. Several public commenters at the June 4 hearing noted the irony that UCSB has five Nobel laureates and yet developed a backward-thinking approach to transportation. UCSB is uniquely situated to develop a forward-thinking approach to managing growth and should take the opportunity to develop this now as part of a recirculated environmental impact report. Further, because enhancing West Goleta’s transit network is a feasible mitigation measure and would substantially reduce Project impacts, the Project cannot be approved as proposed.

5. The EIR Must Be Revised and Recirculated

A lead agency is required to recirculate an EIR when significant new information comes to light after the agency gives public notice of the draft EIR’s availability. CEQA Guidelines § 15088.5 (a). “Significant new information” requiring recirculation includes disclosures showing:

(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented
(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance
(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project proponents decline to adopt it.
(4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Id. Where the EIR circulated for public review omits such significant new information, the public is deprived of a meaningful opportunity to comment. See Guidelines § 15088.5 (a).
There is significant new information in the form of new significant impacts from the proposed Phelps/Mesa road connection. Further a substantial increase in the severity of impacts will result without mitigation. Moreover feasible alternatives and/or mitigation measures exist that are considerably different from others analyzed. The EIR’s failure to include this information deprives the public of the opportunity to comment on a substantial adverse environmental effect of the Project and a feasible way to mitigate or avoid such an effect. As such, the EIR must be revised to include this information and analysis, and recirculated for public review and comment. Id.

In addition to revising and recirculating the EIR to resolve all the deficiencies described in this letter, we seriously urge the University to delete the connection between Phelps and Mesa Roads from the LRDP and EIR. This connection does not resolve the significant traffic impacts associated with UCSB’s expansion and creates numerous significant and unmitigable environmental impacts. UCSB must strive to minimize the environmental impacts of its expansion; adopting ‘mitigation measures’ which significantly increase environmental impacts is a poor method of doing this. By instead adopting the alternatives and/or mitigation measures described herein, UCSB can effectively reduce the overall environmental impact of the Project and simultaneously achieve its important institutional goals.

Thank you for your consideration of these comments.

Sincerely,

LAW OFFICE OF MARC CHYTILO

Marc Chytilo
For Storke Ranch Master Owners Association

CC: Mayor Michael Bennett, City of Goleta (by email to mbennett@cityofgoleta.org)
Dianne Black, Santa Barbara County Planning and Development Department (by email to Dianne@co.santa-barbara.ca.us)
Henry T. Yang, Chancellor, UCSB (by email to henry.yang@chancellor.ucsb.edu)
Gene Lucas, Executive Vice Chancellor, UCSB (by email to gene.lucas@evc.ucsb.edu)
Marc Fisher AIA, Associate Vice Chancellor for Campus Design & Facilities, UCSB (by email to Marc.Fisher@fm.ucsb.edu)

Jack Ainsworth, Deputy Director, California Coastal Commission, Ventura Office (by email to jainsworth@coastal.ca.gov)

Dan Singer, City Manger, City of Goleta (by email to dsinger@cityofgoleta.org)

Michael Brown, CEO, County of Santa Barbara (by email to cao@co.santa-barbara.ca.us)

James Armstrong, City Manager, City of Santa Barbara (by email to JAArmstrong@SantaBarbara.CA.gov)


Exhibit 2: Gaviota Coast Projects, Santa Barbara County Planning and Development, June 2008

Exhibit 3: County Bike Map, Goleta Area, downloaded June 18, 2008 from http://www.trafficsolutions.info/bikemap.htm

Exhibit 4: Camino Real Specific Plan, July 22, 1997, selected pages

Exhibit 5: Agreement, Fire Access Road and Gate, 98-078622, 10/13/1998

Exhibit 6: City of Goleta General Plan Amendments Tracks 2 and 3, (Updated February 5, 2008)
Letter O-20
Marc Chytilo
For Storke Ranch Master Association

June 23, 2008

Response to Comment O-20-1. The inconsistency in pagination between the DEIR that was posted on the www.UCSBVision2025.com website and that which was recorded on DVD is noted.

Response to Comment O-20-2. Upon receipt of this comment, the University updated the transportation study to include the additional documentation requested by the City of Goleta. The University is committed to working with agencies and local jurisdictions to ensure a complete and comprehensive impact study is conducted for the LRDP. Therefore, several sections of the Draft EIR were revised and released for public review and input as part of the Recirculated Draft EIR. The additional documentation requested in this comment is presented in the Recirculated Draft EIR Transportation & Circulation Section 4.13, pages 4.13-69 – 4.13-76 and Appendix 4.13-3.

Response to Comment O-20-3. Please see Master Response - Phelps/Mesa Connection

Response to Comment O-20-4. As shown in the graphs on page 4.13-4 of the recirculated Transportation Section, traffic volumes within the study area are substantially higher during the PM peak hour than during the AM peak hour.

Response to Comment O-20-5. Please see Master Response - Phelps/Mesa Connection

Response to Comment O-20-6. Please see Master Response - Phelps/Mesa Connection

Response to Comment O-20-7. Please see Master Response - Phelps/Mesa Connection

Response to Comment O-20-8. As explained in response to comment A-13-1, increased transit use, by itself, is not an adverse impact on the physical environment. Moreover, any underestimation of future transit demand would not alter the RDEIR’s conclusions regarding traffic impacts. If, as the commenter suggests, more people shift to transit from driving, then there will be fewer vehicle trips, and traffic conditions will be better than the RDEIR projects. The RDEIR will turn out to have analyzed a worst-case scenario that did not come to pass.

Response to Comment O-20-9. Please see response to comment I-44-18A.

Response to Comment O-20-10. Please see response to comment I-42-6.

Response to Comment O-20-11. Please see Master Response - Phelps/Mesa Connection.

Response to Comment O-20-12. Please see Master Response - Phelps/Mesa Connection.

Response to Comment O-20-13. Please see Master Response - Phelps/Mesa Connection.

Response to Comment O-20-14. Please see Master Response - Phelps/Mesa Connection.

Response to Comment O-20-15. Please see Master Response - Phelps/Mesa Connection.
Response to Comment O-20-16: Please see Master Response - Phelps/Mesa Connection regarding impacts to Bayberry Lane. Phelps Road is within the jurisdiction of the City of Goleta, not the County.

Please see Master Response - Phelps/Mesa Connection for traffic safety, safety of nearby residents, and bicyclists.

Response to Comment O-20-17. The DEIR acknowledges sensitive receptors in the analysis of air quality impacts (see Section 4.2.1.4). The methodology for estimating vehicular emissions is explained on page 4.2-19. The impacts resulting from vehicular emissions are discussed in Impacts AIR-1 and AIR-2, including a discussion of the health risk assessment performed as part of this DEIR. The EIR concluded that overall impacts to air quality from primarily vehicular sources would be significant and unavoidable (p. 4.2-29).

Response to Comment O-20-18. Please see response to comment I-42-6.

Response to Comment O-20-19. The DEIR, under CEQA, addresses the physical environmental impacts of proposed development, and only considers socioeconomic effects as far as they may translate to significant physical impacts (CEQA Guidelines §15131). Impact areas such as traffic safety, air quality, and noise are addressed in their relative sections (4.13, 4.2, and 4.9, respectively). For information regarding environmental justice issues related to the Phelps/Mesa connection, please see Master Response – Phelps/Mesa Connection.

Response to Comment O-20-20. A. Four alternatives are described in detail and analyzed in Section 5.0 of the DEIR. The alternatives are 1) a reduced enrollment of 3,000 students over the 20-year planning span (and subsequent reduction in faculty, staff, and academic space needs), 2) implementation of a “virtual university” to provide on-line educational resources reducing the need for physical development, 3) no new on-campus housing, and 4) the no-project alternative (as required by CEQA). These alternatives all analyze less physical development.

B. Please see response to comment I-42-12.

C. Please see response to comment I-26-8B.

D. Please see response to comments R-4-19, A-12-48 and A-13-1 for information on alternative transportation planning.

E. The DEIR discusses the University and the local and regional transit systems that serve the campus (pp. 4.13-31—45). Under the LRDP, the bus loop located off of Ocean Road would be reconfigured to provide a clearer, safer transit hub. Additional bus and shuttle stops will be provided throughout University housing neighborhoods and the University will work with the MTD for the improvement and expansion of transit routes and stops.

Response to Comment O-20-21. The DEIR was revised and recirculated. The public comment period for the RDEIR began on February 9th, 2009, and lasted for 49 days.

The request to remove the Phelps/Mesa Road connection from the LRDP is noted and will be considered.
June 23, 2008

Ms. Alissa Hummer
Campus Planning & Design
Facilities Management
c/o UCSB Vision 2025
UC Santa Barbara, CA 93106-1030

RE: LRDP DEIR Comment Period – Request for Extension

Dear Ms. Hummer:

This office represents the Storke Ranch Master Owners Association in this matter.

It has come to our attention that the University provided the City of Goleta with a document reflecting the assumptions underlying the traffic modeling analysis used in the LRDP DEIR. At the June 17, 2008 Goleta City Council meeting we requested a copy of this document from City planning staff but have yet to receive it. We also attempted to reach you this morning, and left a voicemail requesting a copy of this document and informing you of our intention to submit a request for an extension of the comment period so that we and our experts may review this critical information.

It is clear that an extension of a public comment period is within the lead agency’s discretion. See, Guide to California Environmental Quality Act, 10th Ed., 1999, Solano Press, page 299 (authors providing their opinion that agency has discretion to extend comment periods). Under these circumstances, we believe that the University has discretion to extend the public comment period for the reasons stated herein. The public’s ability to review, respond and comment upon the DEIR is severely compromised by the exclusion of these modeling assumptions which form the basis for the DEIR’s conclusions regarding the Project’s traffic impacts.

1. **CEQA Permits Longer Public Review Periods When Unusual Circumstances Are Present**

CEQA Guidelines § 15105 defines an appropriate public review and comment period for a DEIR as ordinarily not extending beyond 60 days “except under unusual circumstances.” Guidelines § 15105(a). Public review and comment on environmental review documents is “an essential part of the CEQA process.” Guidelines § 15201. CEQA imposes a “responsibility” upon every citizen “to contribute to the preservation and enhancement of the environment.” Pub. Res. Code § 21000(e). Storke Ranch residents as well as thousands of Goleta, Isla Vista, and County residents will be severely impacted by the LRDP, particularly with regards to the Project’s significant traffic impacts. Discussed below, the assumptions underlying the traffic modeling...
analysis greatly affect the DEIR’s traffic impact analysis. The University provided the City of Goleta with a document reflecting these assumptions, but failed to do so in a timely manner (City staff received the document a mere week before the end of the comment period). More troubling, the University failed to provide this document to the public. Because of the critical nature of the assumptions underlying the traffic model and the significant discrepancies with existing traffic data introduced by the assumptions, discussed below, the University’s failure to disclose this information constitutes an unusual circumstance warranting an extension to the public review and comment period.

The assumptions underlying the DEIR’s traffic model have a substantial effect on the traffic impact analysis. As discussed at length by the City of Goleta in their comment letter, the DEIR used the City of Goleta’ calibrated traffic model as a basis for its Traffic Model, but modified that model with a series of undisclosed and potentially questionable assumptions without further calibration. The application of these assumptions create significant land use discrepancies between the DEIR’s modeling and the Goleta’s 2005 baseline for all three land use categories bearing on UCSB’s travel demands: students, faculty/staff and the number of dwelling units. These assumptions also generate discrepancies with UCSB’s own Campus Profile figures. The City of Goleta’s draft comment letter articulates this issue as follows:

The LRDP No-Project and the LRDP Final modeled land use assumptions reflect roughly half the UCSB employment and roughly 3,000-5,000 less enrolled students than the City’s 2005 baseline and UCSB’s own 2006-07 Campus Profile figures. Hence, UCSB’s LRDP travel model developed for the estimation of LRDP travel impacts is inconsistent with like data reported in both the LRDP and DEIR and by UCSB itself. As such the travel forecasts generated by the LRDP traffic model may underestimate both future traffic volumes associated with the LRDP and associated traffic impacts.

The LRDP No-Project and Final model land use assumptions reflect roughly 5,000 and 12,000 more dwelling units than the City’s 2005 baseline and General Plan assumptions respectively. The LRDP model estimate of dwelling units equate to occupancy of 1.55 and 1.19 students/UCSB employees per dwelling unit for current and future conditions respectively. This does not appear to be a reasonable accounting of baseline or future dwelling units related to UCSB affiliated housing.

Given the aforementioned land use assumption discrepancies, travel forecasts based on these land use assumptions are questionable. The cited land use discrepancies require explanation and documentation in the DEIR.

The substantial discrepancies identified by the City of Goleta call the accuracy of the entire traffic analysis into question. For this reason, UCSB must disclose all assumptions underlying its traffic model to the public and extend the comment period so that the public, experts, and public agencies may review these assumptions.
2. **The Public Requires Additional Time for Expert Analysis**

CEQA's public review and comment process has a number of functions detailed at Guidelines § 15200. One particular function relevant to this request is the exchange between professional in specific fields and the lead agency, responsible and trustee agencies and the Applicant. Commenting on complex environmental review documents today involves the expertise of persons with specialized qualifications to analyze and address a project's formulation, impacts and mitigation. In this case the assumptions underlying the traffic model warrant expert analysis, which is precluded by the University's failure to include these assumptions in the DEIR or otherwise provide them to the public for review.

For all the above reasons, the Storke Ranch Master Owners Association believes that an extension of the public comment period for comments on the DEIR is warranted. We request that the public comment period on the entire DEIR be extended for 30 days until the end of July.

Please contact this office if you have concerns or questions.

Sincerely,

LAW OFFICE OF MARC CHYTIO

Marc Chytio
For Storke Ranch Master Owners Association

CC: Steve Chase, Director, City of Goleta Planning and Environmental Services (by email to schase@cityofgoleta.org)

Client
Response to Comment O-21-1. The public review period on the Draft EIR was extended twice, and its traffic analysis was revised and recirculated, as discussed in response to comment O-20-21. The DEIR and RDEIR’s modifications to the City of Goleta traffic model are discussed in responses to comments R-8-21 through 30.
Comments and Responses on the Recirculated Draft EIR

This chapter presents all written and oral comments received on the Recirculated Draft EIR. It is recommended that reviewers use the Index to Comments (Chapter I of this volume) to locate comments from specific agencies, individuals, or organizations.
Comments and Responses on Recirculated Draft EIR
UCSB Recirculated EIR Public Comments  
April 1, 2009

From: UCSB Vision [mailto:info@ucsbvision2025.com]  
Sent: Wednesday, April 01, 2009 2:00 PM  
To: 'Dorothy Dent'  
Subject: RE: Please process these comments to the UCSB LRDP submitted 3/31

Thank you for your comments/questions regarding the UCSB Long Range Development Plan. Your correspondence will be entered into the record and addressed within the formal response that will follow after the public comment period closes on 3/31/2009. If you would like to receive notice of future meetings and/or report releases and are not currently on our mailing list, please register on the project Web site, http://www.ucsbvision2025.com/contact.html. We appreciate your interest in UCSB.

From: Dorothy Dent [mailto:saveislavistaparks@gmail.com]  
Sent: Tuesday, March 31, 2009 7:52 PM  
To: info@ucsbvision2025.com  
Subject: Please process these comments to the UCSB LRDP submitted 3/31

Dear UCSB-  
As a member of the UC community- my oldest son Ari Nachison, is a Junior in the Engineering and Mathematics Departments (and works in the Chemical Engineering lab) and has worked at the UCSB-CSO for 3 years; I attended UCSD and UCSC, and my partner graduated from UCSB and stayed in Isla Vista to start a recycling business and our family business the Isla Vista Bicycle Boutiques in Isla Vista. We appreciate very much UCSB's commitment to growing itself "green" and its concentrating on building its education programs to best serve the local and international higher-education community. I feel that this could be accomplished to a higher degree by de-emphasizing the development of housing and retail and instead making sure that the limited growth of the University due to its existence inside of a giant nature preserve and next to the ocean emphasizes the development of education oriented buildings. By leaving as much nature intact as possible, this would allow researchers to better study wetland habitat and the biological diversity of the local flora and fauna. This could best be accomplished by NOT tearing down the beautiful monarch butterfly and migratory bird habitat of the Ocean Road and the border between IV where all the eucalyptus and other trees are. Leaving the beautiful trees along Ocean Road and the Student Health area should not alter too much UCSB's goals of promoting education.  
The economy has shifted and there is a glut of affordable for sale and rental units in our area. In fact, I work in advertising at the Independent, and we have as well as Craigslist, many listings of houses, apartments, condos, etc. for rent and for sale now at very reasonable prices. There is no reason, when you have your own UCSB tenants dumping San Clemente rooms on Craigslist for sublet, to build more ugly boxy units on top of our fragile environment and precious open land that ruin our beautiful area! Why in the world would you hire out of town consultants who know nothing about bicycling to come in and tell you to make through streets by Ocean Road into IV? That would be a disaster and would facilitate more cars and driving instead of less. We do not have the proper infrastructure to support too many more folks to live on your campus as the impacts spill over to our town IV. We have already had all our trees cut down that used to be
here before all the development you and the County have done recently let alone the insanely large additional amount you are proposing in this plan. Have you people lost your minds? 50K sf retail space? 100s of housing units? Are you trying to destroy the retail and rental based community in IV? We bring in alot of taxes to our local governments, we volunteer at philanthropic organizations and we enjoy serving you and your students daily. Is this what we get? A slap in the face for our years of service because UCSB (our own government) can potentially undercut our businesses with its voracious appetite to attract homebuyers/renters/retailers by building more and more weird styles of jumbles of buildings and parking lots that have nothing to do with education? No way can we homeowners and business owners compete with you. You don't even have to pay taxes nor go through the Planning Commission.

Now obviously, some remodeling and razing of structures will occur- that is fine, and your new entry gates and El Colegio Road expansion are acceptable although proper global warming mitigation has not seemed to occur yet! But please don't decimate the entry to IV through the Pardall tunnel that brings kids close to trees and nature and an historic in the street style park? I'm sorry, but I will tell you now, I will exhaust all legal options to stop the destruction of Isla Vista Parks, trees and bike and walkways, and by the clear results of the despicably and underhandedly drafted Measure D2008 (that would have built parking lots over Pardall Gardens and other IV parks) and its resulting emphatic NO vote in November 08, so will 80% of the voters :>!

I will be having a booth at Earth Day on April 19th as we always do, and I invite you to come anytime to our shops or our booth to talk candidly about how you are going to modify this overreaching plan to reflect all the wonderful and caring comments that nature and community lovers have given you.

Through a UCSB worker friend, I saw the crazy Social Sciences Survey that was sent out to your employees that used our government resources to promote some weird Real Estate scheme that asked your employees if they wanted to pony up the big dollars to move in to "brand new" housing on campus, now in the past, that idea may have had its roots in a decent proposal if it wasn't for the worldwide collapse of the economy due to that very type of low interest, sub-prime lending mentality!

So please, be a friend to the environment that you are in. We have families, businesses, employees, students, etc. who are codependent on our tenants, customers, etc. Pleeaaase do not forsake us. We will not be able to continue offering the great houses, merchandise, jobs to employees, tax money to the government etc. if you do not scale back on this plan that frankly sticks a stake into our backs. We are your customer! I pay you big $$s for my children's education, please have some sympathy on us and try to stick to your mission of education NOT vast increases in Housing, Retail and nature destructing development.

Why aren't you treating this beautiful, natural area with respect as well as awe and vowing to save it not to destroy it! Your actions if this plan proceeds this way reflect true hipocrisy. You know the environment is fragile, the migratory birds, animals and butterflies use it, yet you would have it destroyed for profit? This is a nightmare that you must be woken from. If you were ignorant of the environmental harm this project creates, then that would be one thing- but you, UCSB, know better. Where are your solar hot water panels on San Clemente? Why are you leaving the electric lights on in every parking lot 24-7? Why are you chopping down trees right and left so you can have a Wendy's? Please downscale your ridiculously insane retail and housing plans. Then you will be able to build more education facilities and maybe even offer
more classes and programs for community members like me and my family. Your residential buildings proposed for Devereux pose exactly the same problem. We don't need more ugly housing on Nature's perfect meadows. Not only are you trying to overdevelop but so is the County of SB, the City of SB's Airport and the City of Goleta. You, UCSB, should be fostering consensus among our governments for a comprehensive EIR for the entire area. The information used for all these government EIR plans is old, and defunct. It even still shows the Storke field which is way gone, and we used to have a golf range that you had shut down. You even tried to influence the overdevelopment inducing horrific Master Plan (that would itself displace us) by having a top heavy UCSB panel for the GPAC/PAC, but when the student representative voted in a thoughtful way for the community- you pulled him off the panel. Is that a good example of stewardship in decision making? No. You need to improve your community by helping to protect it, keep its members safe, and clean it up and restore it like you should, and I know in your hearts you know how, and I trust you will. Particularly if I get to be there to help direct you that way- the right, just, nature-loving way. So please reform, repent and restore your LRDP to be Less Resource Diminishing and Profiteering and make it be a Low Retail, Downscaled Plan.

Thank You so much for this opportunity to comment.

Sincerely,
Dorothy Dent c/o The Independent 122 W Figueroa St. Santa Barbara CA 93101
(Residence: 6624 Sueno Rd Isla Vusta CA 93117, Business: 880 Embarcadero del Mar & 6639 Trigo Isla Vista CA 93117)
Letter R-1
Dorothy Dent
3/31/2009

Response to Comment R-1-1. One of the goals of the LRDP’s housing program is to alleviate the jobs/housing imbalance of the region by providing more housing close to the places where new jobs will be generated. This, in turn, would alleviate several other impacts such as traffic and air quality as compared to housing the same number of new employees and students off-campus. In addition, all new development would occur on existing campus properties and their respective developed areas; the campus footprint is not being expanded to accommodate new development as part of the LRDP.

Response to Comment R-1-2. The DEIR discusses eucalyptus windrows on p. 4.3-5:

“Large windrows are present on Main Campus at Ocean Road, El Colegio Road, and between Phelps Hall and the Lagoon. Storke Campus has a small windrow along the southern edge of the Stork Wetland, and a large windrow is present along the western border of North and West campuses. Specific locations are shown on Figure 4.3-1. The eucalyptus windrows along the western border of the North and West Campuses contain a Monarch butterfly aggregation area near Devereux Creek (Meade 1999, URS 2004), and provide white-tailed kite nesting areas (URS 2004). Trees used by Monarch butterflies, or that contain active raptor nests are considered sensitive by state and federal agencies.”

The Ocean Road windrow does not include a Monarch aggregation site. No projects are proposed on, or near, properties with identified monarch butterfly aggregation sites (see Figures 4.3-1 and 4.3-2, in comparison to Figure 3-9. Potential impacts to nesting wildlife are discussed in Impact BIO-3, with mitigation to avoid their disturbance.

Response to Comment R-1-3. As explained in the Population and Housing Section (see EIR subsection 4.10.1.2), the cost of housing in the region is very high, and demand for housing outweighs supply. One of the objectives of the LRDP is to house all additional students, faculty, and staff on existing disturbed sites. This objective would both alleviate housing cost issues for campus affiliates and minimize impacts to sensitive resources For these reasons, most of the new 2010 LRDP development is proposed on lands that have been previously disturbed, or would consists of redevelopment of currently developed properties.

Response to Comment R-1-4. Improving connectivity between Isla Vista and Main Campus will serve to disperse traffic and decrease congestion.

Response to Comment R-1-5. Please see response to comment I-42-23 for an explanation of the purpose of campus growth. The EIR analyzes the effects of induced growth on nearby communities in the applicable impact areas. The EIR will inform the decision makers of the significant environmental effects of the proposed 2010 LRDP when considering the LRDP for approval.

Response to Comment R-1-6. The LRDP proposes an extensive program of improvements to the bicycle system. Closing the Pardall tunnel would occur in conjunction with new connections that would increase accessibility between Isla Vista and campus across Ocean Road, as well as other areas of campus. The following is excerpted from the LRDP EIR Transportation Section (p. 4.13-27).

“The LRDP proposed to provide five new bicycle and pedestrian connections between Isla Vista and the main campus along Ocean Road. The connections would occur at El Greco, Cordoba, Madrid, Seville, and Sabado Tarde. The existing bicycle connections at Picasso and Trigo would continue to provide access between Isla Vista and the Main Campus. With the construction of the proposed connections, the existing grade separated crossing at Pardall providing
access between the main campus and Isla Vista would be removed. The bicycle and pedestrian circulation improvements are shown in Figures 3-12 and 3-13, respectively, and summarized below.

- Shared bike route along the southern section of Ocean Road
- Completion of the Broida expressway on the main campus
- Realigned shared path on the proposed east-west roadway through Storke campus
- New north-south shared bike route on the new roadway between UCen Road and Channel Island Road
- Shared bike routes as part of the proposed Storke Apartments, West Campus Apartments, Facilities Management Housing, West Campus Housing, and Santa Ynez Apartment sites
- New walkway along Devereux Road in West Campus
- New pathway along the coastal bluff with new stairway to beach east of Coal Oil Point to replace degraded existing dirt paths

Also, please note that the University has no jurisdiction over Isla Vista parks, and does not propose the destruction of Isla Vista parks, trees, bikeways, or walkways. On the contrary, aligning and improving Ocean Road would enhance access between Main Campus and Isla Vista neighborhoods, and therefore improve sidewalks, bicycle access, and visibility and safety features.

Response to Comment R-1-7. One of the primary components of the LRDP is an extensive program for sensitive species and habitat protection. Policies that apply directly to protection of sensitive species and habitat are found on LRDP pages F.7 through F.11, and are discussed in Section 4.3 of the EIR. The University has a long tradition of providing and promoting sensitive habitat and species protection, and providing resources of regional importance.

Please see response to comment R-1-3 regarding the reasons that redevelopment of previously developed sites—like the Devereux property—is preferred from both an economic cost and an environmental standpoint.
From: UCSB Vision [mailto:info@ucsbvision2025.com]
Sent: Tuesday, March 31, 2009 10:48 AM
To: 'Matthew B. Anderson'
Subject: RE: Comments on REIR

Thank you for your comments/questions regarding the UCSB Long Range Development Plan. Your correspondence will be entered into the record and addressed within the formal response that will follow after the public comment period closes on 3/31/2009. If you would like to receive notice of future meetings and/or report releases and are not currently on our mailing list, please register on the project Web site, http://www.ucsbvision2025.com/contact.html. We appreciate your interest in UCSB.

-----Original Message-----
From: Matthew B. Anderson [mailto:mbanderson@umail.ucsb.edu]
Sent: Monday, March 30, 2009 11:57 PM
To: info@ucsbvision2025.com
Subject: Comments on REIR

The LRDP is far too ambitious. Santa Barbara County is already expanding at a rate of roughly 1% per year. The LRDP calls for additional expansion on top of what is already happening naturally in SB County. In addition to each extra person that UCSB admits, a job is created, further increasing the number of people in the Santa Barbara area. The total growth - Santa Barbara County (pre-LRDP growth), UCSB, and UCSB-related - exceeds the capacity of vital coastal resources and infrastructures.

UCSB is a global organization and is expanding in many ways to meet international demand, as well as the demands of 50,000+ high school seniors per year who would love to go to college on the beach. However, just because the UC Regents would like to expand UC Santa Barbara does not mean that must come at the expense of the Central Coast's natural resources. Furthermore, their decision to expand enrollment at a research University comes at the expense of the quality of education of undergraduate students.

Many groups and organizations were given presentations of the Long Range Development Plan - local mayors, city councils, etc. More than 50 presentations were made, but not one single presentation was ever given to Associated Students. The last meeting regarding the LRDP was held during dead week, when students should be studying. The last week of the comment period was during spring break, ending conveniently on the first day of classes Spring quarter. This is unacceptable. The students need to be involved in the process and the process needs to take the undergraduate schedule into account. Besides one email from Marc Fisher regarding a parking survey, the University has not utilized the Umail system adequately to inform the University community of LRDP meetings and public hearings.

Ocean Road ?Housing? Project
The eucalyptus and oak trees in this area are a habitat for migratory birds. These historic trees, planted by the Den Brothers over 100 years ago, are an aggregate for Monarch Butterfly and a habitat for migratory birds. The Recirculated Environmental Impact Report does not address bird habitats in eucalyptus trees on Ocean Road, or anywhere else for that matter.

The realignment of Ocean Road and construction of new buildings would visually obstruct valuable scenic views of the Pacific Ocean and the Channel Islands, resulting in complete loss of the current view corridor in violation of Section 30251 of the California Public Resource Code. Ocean Road is not a ?no man?s land,? as described in the Ocean Road Pattern Book. The walkway and bicycle path are used by thousands of students every day for transit as well as recreation. This area is a functionally open space utilized by UC Santa Barbara residents and the community of Isla Vista. As stated in the 2008-2009 Santa Barbara County Budget, ?The lack of open space in Isla Vista is a long-standing issue. Only 2.9 acres of open space per 1,000 persons is currently available? (D-268). Development of Ocean Road would increase the density of the population without mitigating the need for open space for residents in that area. The Ocean Road development itself does not constitute open space.

Development along Ocean Road would block coastal views from properties in Isla Vista on Del Playa Drive, El Nido Lane, and Sabado Tarde Road. These properties, public streets, sidewalks, and parking spaces have Southwestern coastal views of the Pacific Ocean and the Channel Islands that are enjoyed by beach-goers parking along these streets. Isla Vista is a special community/neighborhood that, because of its unique characteristics, is a popular visitor destination point for various recreational uses, as specified by the California Public Resource Code Section 30252(e). Development along Ocean Road would worsen parking problems along these streets, inhibiting beach access.

The proposed building heights for Ocean Road exceed the current regulations in the Isla Vista Master Plan, as does the inclusion of commercial development.

The recreational space near Student Health Services contains a lone quercus agrifolia (Coast Live Oak) that, if left undisturbed, would flourish. It may be a habitat for local birds.

The REIR does not mention how bicycle, pedestrian, and vehicle traffic will be mitigated following the removal of the grade-separated bicycle crossing (the bike tunnel) at Pardall.

Finally, the public comment period was not long enough. Although the period was longer than required, the LRDP and REIR require considerable time to read and address.

--

Matthew B. Anderson
mbanderson@umail.ucsb.edu
Letter R-2
Matthew Anderson

3/30/2009

Response to Comment R-2-1. New jobs created by increased enrollment would not necessarily be filled by residents new to the region. Many jobs will be absorbed within the region by existing residents, including UCSB students. This EIR demonstrates that with mitigation, existing resources and infrastructure can accommodate the growth proposed under the LRDP. Impacts on trees are analyzed in Impact BIO-3. Please see, in addition, response to comment A-10-28 amending Mitigation Measure BIO-3A, and responses to comments A-12-53 and A-12-60.

Response to Comment R-2-2. As stated on pages 4.1-34 and 35 of the RDEIR,

“The 2010 LRDP identifies a substantial alteration to the Ocean Road corridor that could have the potential to affect views to coastal scenic resources from public viewing areas surrounding the campus. Viewer sensitivity from the Isla Vista community to the Ocean Road project is expected to be moderately high, in part because of Ocean Road’s function as a primary access route to campus, and in part because of the community’s pride-of-place. The interface between the community of Isla Vista and the Main Campus could be adversely affected by the increased density and height of the proposed Ocean Road housing and mixed-use project. Although existing two-story buildings currently define the easternmost border of Isla Vista, any new development proposed for Ocean Road must relate not only to the campus, but also to the adjacent residential neighborhood in terms of appropriate scale, form and appearance. In addition, the realignment of Ocean Road to accommodate new development would have the potential to affect existing ocean and mountain views along the roadway length.

LRDP Mitigation AES-3A would reduce such impacts to a less-than-significant level. It states as follows:

Prior to approval of development projects along Ocean Road under the 2010 LRDP, the UC Santa Barbara Design Review Committee shall review project designs for:

- Protection of views to coastal and mountain resources from viewpoints on Ocean Road, roadways within Isla Vista, and along El Colegio Road.
- Campus development and design along Ocean Road respecting the adjacent Isla Vista neighborhood in terms of scale, proportion, appearance, and solar access, as well as maximizing views to the Pacific Ocean.
- Landscaping associated with project development and design along Ocean Road not blocking views of the ocean or hills.”

This is a program-level mitigation measure. Project-level mitigation will be identified at the time that individual projects under the 2010 LRDP are proposed. Such projects will be subject to further review under CEQA.

Response to Comment R-2-3. The LRDP would enhance and expand recreational and open space resources. As explained on EIR page 3.0-31 and LRDP page D.3, 446 acres of open space proposed on campus lands. Of that substantial open space area, 301 acres would have the ESHA overlay. The remaining acreage would consist of recreation, buffer space, recreational facilities, and other supporting uses. In addition, the University provides many recreational resources to the general public, as outlined in Table 4.12-2 of the EIR (DEIR, p. 4.12-6). These include active recreation field facilities such as Storke Fields and tennis courts, which are available for community use, including the general public.
The EIR found that the population would be adequately served by a combination of active and passive recreational resources throughout implementation of the 2010 LRDP (DEIR, p. 4.12-25, 26). Please see response to comment A-2-25.

**Response to Comment R-2-4.** Please see responses to comments A-12-17, A-17-AES-1 and A-17-AES-7 and R-2-2.

**Response to Comment R-2-5.** The land use designations and standards of the Isla Vista Master Plan do not apply to campus development. The mitigation discussed in the response to comment R-2-2, above, will ensure compatibility between campus projects and adjacent existing development in Isla Vista.

**Response to Comment R-2-6.** Comment noted.

**Response to Comment R-2-7.** The impacts of the 2010 LRDP on bicycle and pedestrian traffic are analyzed in RDEIR Impact TRAFFIC-7, pages 4.13-185 through -161. Please see responses to comments R-1-6 and I-44-8.
From: UCSB Vision [mailto:info@ucsbvision2025.com]
Sent: Tuesday, March 31, 2009 10:47 AM
To: 'Michael Peterson'
Subject: RE: Development Plan Ocean Road - Response

Thank you for your comments/questions regarding the UCSB Long Range Development Plan. Your correspondence will be entered into the record and addressed within the formal response that will follow after the public comment period closes on 3/31/2009. If you would like to receive notice of future meetings and/or report releases and are not currently on our mailing list, please register on the project Web site, http://www.ucsbvision2025.com/contact.html. We appreciate your interest in UCSB.

From: Michael Peterson [mailto:mpetersonoh7@gmail.com]
Sent: Monday, March 30, 2009 11:23 PM
To: info@ucsbvision2025.com
Subject: Development Plan Ocean Road - Response

U.C.S.B. Development Committee

The Long Range Development Plan’s construction strategy for Ocean Road raises a number of questions regarding effects on the comfort of urban life within and around the vicinity. The realignment of Ocean Road, along with the planned building heights of 70 feet (incompatible with the I.V. Master Plan’s 40 foot limit), would disrupt the view of Isla Vista residents along that road stretch. These buildings will also cast unsightly shadows on adjacent structures. The overall plan to frame the views of the campus in no way enhances the atmosphere of the land. Development along Ocean Road will obstruct the transit between two neighboring communities and promote tensions.

The resulting destruction of the scenic landscape would disrupt the habitat of indigenous flora and fauna. An environmental impact report should be assembled by individuals who are in no way affiliated with lining the pockets of the U.C. fund. These individuals should be knowledgeable about migrating species of birds and insects (monarch butterfly) and should conduct an investigation at least a year in duration to accurately document the presence of migratory birds.

The new buildings planned for development on Ocean Road will blot out the picturesque coastal view and mar the beauty of this pristine campus. UCSB should continue its coastal restoration along Ocean Road replacing the eucalyptus trees as they die with Coast Live Oaks, and planting species such as the Jaumea Carnosa which currently grows at the ends of Madrid, Pardall, Cordoba, and Segovia. The university should increase the number of units in other developments without destroying the space between Isla Vista and campus. If U.C.S.B. would conduct a visitor summary on Ocean Road then it would be sure to list recreational use (Frisbee, walk/runs) and bicycle transit.

The L. R. D. P. is too ambitious and will put a strain on the communities of U.C.S.B. and Isla Vista.

-Michael Peterson
U.C.S.B. Alum
Letter R-3
Michael Peterson

3/30/2009

Response to Comment R-3-1. Please see responses to comments A-12-17, A-17-AES-1 and A-17-AES-7 and R-2-2. Blockage of views and similar effects of structures (such as shadows) would be subject to the same mitigation for aesthetic impacts as discussed in the referenced responses.

Ocean Road development would include several new connections between Main Campus and Isla Vista, increasing accessibility and dispersing traffic.

Response to Comment R-3-2. The EIR preparers consist of professional consultants with no financial interest in whether or not the LRDP proceeds as proposed. Public Resources Code Section 21082.1(a) specifically provides for EIRs to be prepared by consultants under contract to the lead agency.

Biology Section (p. 4.3-1) includes the following discussion of the EIR’s methodology.

"Biological information presented in this section is based on review and compilation of pertinent literature, previous studies in the area, regulatory requirements, and on focused biological surveys conducted on the UC Santa Barbara campuses for this EIR section. Aerial photos, maps, and LRDP project overlays were used to identify campus areas proposed for development that required focused biological analysis. Previous biological studies and reports prepared for UC Santa Barbara are cited throughout this section to document historical occurrences of special-status plant and animal species, sensitive plant communities, and sensitive habitats within the campus boundaries."

Please see responses to comments R-1-2 and R-2-1 regarding impacts to trees.

Response to Comment R-3-3. Regarding views from Ocean Road, please see the response to comment R-2-2.

Regarding impacts to trees, please see responses to comments R-1-2 and R-2-1.

Regarding the transition between Isla Vista and Campus, please see response to Comment R-2-5.
March 30, 2009

Marc Fisher, AIA, Senior Associate Vice Chancellor  
Campus Planning and Design  
Facilities Management  
c/o Vision 2025  
UC, Santa Barbara  93106

Re: Draft Environmental Report  
2008 UCSB Long Range Development Plan

Dear Mr. Fisher,

Please accept these comments from COAST - the Coalition for Sustainable Transportation - on the Transportation and Circulation, and Air Quality, sections of the re-circulated draft EIR for the Vision 2025 UCSB Long Range Development Plan (LRDP), for full public review under California Environmental Quality Act (CEQA).

COAST believes that “getting around” should enhance the lifestyle and landscape of our community. That’s why we work to enhance transportation choices in Santa Barbara and along the Central Coast through advocacy, education and outreach. By promoting rail, bus, bike and pedestrian access, we seek options that meet the practical needs of our community while addressing the challenges of climate change and energy dependence.

We see the University of California, Santa Barbara’s proposed Long Range Development Plan as an invaluable opportunity for UCSB to be a leader in transportation planning. While we acknowledge the great benefit of UCSB as a community partner, COAST does not feel that the current recirculated EIR (REIR) is adequate in addressing transportation and we have thus provided specific comment in the hopes of improving the plan.

The REIR is a (generally) reasonable, good faith effort to present (generally) accurate & complete information about anticipated project impacts.

In addition the EIR properly:
  • recognizes UCSB as the largest employer, service vendor, and (with nearby Camino Real shopping center) trip generator, on the south coast  
  • recognizes that current, properly measured levels of service on major local arterial and collector streets, and key state highways, proximate to UCSB (and Isla Vista, student-dominated residential areas), already exceed state, county, and municipal LOS targets
• acknowledges that vehicular traffic to, around, through, the UCSB campus (and related) areas already cause LOS exceedances, and higher than expected vehicular accident levels, even under current conditions.
• identifies Class One adverse, residual impacts to the project area (and the larger community) from existing and new vehicular traffic, which will continue to exist after all suggested mitigations in the draft have been applied

COAST feels that the University has failed to adequately address many of these Class One impacts, which under recent California laws (i.e. AB 32, SB 97, AB 471) would require further analysis and mitigation of all these impacts anyway.

Reasonable and feasible mitigations under CEQA are available to further reduce below the level of significance:
   a) total average daily trips;
   b) peak hour trips;
   c) critical turning movements;
   d) campus (and Isla Vista) parking demand, and
   e) much of the significant adverse air quality impacts.

These more effective mitigation (and offset) strategies for traffic related impacts are already widely used by numerous American institutions of higher educations. They are not adequately analyzed, nor prioritized, by the draft LRDP EIR. This omission constitutes a major failure of the LRDP CEQA review. Therefore, this draft EIR should NOT be certified, in its present form.

Discussion of UCSB’s Proposed Mitigations
It is legally unacceptable under CEQA for a draft EIR which identifies Class One impacts that are not fully mitigated, to use as many un-quantifiable, vague, ambiguous, imprecise words to describe UCSB’s efforts to mitigate its project’s impacts.

The 74 citations of: “could”, “might”, “consider”, “study”, “monitor”, “attempt”, “review”, “share”, “discuss”, “eventually”, “enhance”, “promote”, “work with”, (and similar words) should be clarified before the draft EIR can be certified.

Legally stronger language should include “shall” or “must” for could; “shall” or “will” for might; “commit” for consider; “study and implement” for study, “monitor and effectively enforce” for monitor, “execute” for attempt; “review and execute” for review; “fully fund” for share costs; “negotiate, agree, implement” for discuss, “complete or fully mitigate by (a specific date or gatekeeper mechanism)” for eventually, etc.

The three (3) miscalculations of critical turning movement numbers and impacts should be corrected in the graphic support material; the use of differing numerical values for the same traffic impact, or mitigation effort, should be made congruent.

Specific language suggestions can be found in the following section for each of the traffic mitigations.

LRDP Impact TRAFFIC-1: The proposed UC Santa Barbara LRDP would increase peak hour traffic volumes using City of Goleta intersections resulting in degraded LOS conditions under 2025 Plus Project conditions.
LRDP Mitigation TRAFFIC-1

1. Enhance and promote existing transportation demand management measures develop new measures to reduce travel by single occupant vehicles to achieve an overall reduction of 10% of trips to and from campus (measured against the anticipated LOS in Tables 4.13-39, 4.13-41, and 4.13-48).

   COAST Comments: “Enhance and promote” should read “expand and promote” as the existing systems will need expansion to accommodate the new growth as well as potential unmitigated previous impacts from the University’s 1990 LRDP. The current system should also be “maximized and optimized”. The “anticipated LOS” is a reference to a currently unidentifiable value. In addition, it says, “new and enhanced measures should focus on reducing vehicle travel” where it should read, “shall reduce vehicle travel”. These measures need to be “identified, funded and implemented”.

2. Within one year following LRDP approval and annually thereafter, monitor traffic conditions on campus and at impacted nearby City and County intersections and roadways. Monitoring will include the intersections and roadways analyzed in the traffic modeling effort for this EIR, specifically those set forth in Tables 4.13-39, 4.13-41 & 4.13-48.

   COAST Comments: This does not identify who will be performing the monitoring nor who will provide the funding for monitoring. Additionally, identifying what will be evaluated is essential (i.e. ADT, peak hour only, accidents, etc.). Also, when impacted intersections have been identified, it should not follow that “roadway improvements such as widening or traffic signal timing” are the only measures considered. Measures intended to reduce demand for SOV use should also be considered as solutions to potentially impacted intersections.

3. Work with the Cities, County, SBCAG, and SBMTD and other transit providers to determine appropriate transportation improvements, for providing mitigating offsets to increased traffic (e.g. transit stops, bicycle paths, transit subsidies).

   COAST Comments: The clause “work with…” is vague and only indicates process and does not commit to any end results. The University should “identify, fund, and implement mitigation strategies”.

4. Contribute to the City of Goleta and County of Santa Barbara the University’s proportionate share of mitigating significant impacts to intersections and roadways identified in Tables 4.13-39, 4.13-41 & 4.13-48 due to 2008 LRDP traffic increases. Contributions made by the University that exceed its proportionate share of the cost of mitigating a particular impact or that mitigates more than its impact may be credited towards mitigation by the University of future impacts. The University’s payment will be made available to the jurisdiction no later than the start of construction or when implementation of the improvement is reasonably certain.

   COAST Comments: Contributing to the City of Goleta and County of Santa Barbara is essential but with impacts to Highways 101 and 217, the UCSB should also be contributing its mitigation share to Caltrans. While we agree that one aspect of determining the University’s proportionate share incorporates “the percentage of traffic attributable to UC Santa Barbara”, it is not clear whether this will include previously unmitigated impacts from the 1990 LRDP. Many of the intersections and arterials referred to in the document are exceeding acceptable LOS due to previous impacts from the University and so should be included in determining the current proportionate share.

   Payment of in lieu traffic mitigation fees to other government agencies to mitigate identified transportation-circulation-air quality impacts should not allow UCSB to expand within the LRDP until after fee-funded projects were completed.
LRDP Impact TRAFFIC-2: The proposed UC Santa Barbara LRDP would increase peak hour traffic volumes using Santa Barbara County intersections resulting in degraded LOS conditions under 2025 Plus Project conditions.

LRDP Mitigation TRAFFIC-2A:
(1) Enhance and promote existing transportation demand management measures and develop new measures to reduce travel by single occupant vehicles to achieve an overall reduction of 10% of trips to and from campus (measured against the anticipated LOS in Tables 4.13-39, 4.13-41 & 4.13-48).

   COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A.

(2) Within one year following LRDP approval and annually thereafter, monitor traffic conditions on campus and at impacted nearby City and County intersections and roadways. Monitoring will include the intersections and roadways analyzed in the traffic modeling effort for this EIR, specifically those set forth in Tables 4.13-39, 4.13-41 & 4.13-48.

   COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A.

(3) Work with the Cities, County, SBCAG, and SBMTD and other transit providers to determine appropriate transportation improvements, for providing mitigating offsets to increased traffic (e.g. transit stops, bicycle paths, transit subsidies).

   COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A.

(4) Contribute to the City of Goleta and County of Santa Barbara the University’s proportionate share of mitigating significant impacts to intersections and roadways identified in Tables 4.13-39, 4.13-41 & 4.13-48 due to 2008 LRDP traffic increases. Contributions made by the University that exceed its proportionate share of the cost of mitigating a particular impact or that mitigates more than its impact will be credited towards mitigation by the University of future impacts. The University’s payment will be made available to the jurisdiction no later than the start of construction or when implementation of the improvement is reasonably certain.

   COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A

LRDP Impact TRAFFIC-3: The proposed UC Santa Barbara 2008 LRDP (with and without the proposed roadway improvements) would increase peak hour traffic volumes on campus resulting in increased congestion during peak travel hours.

LRDP Mitigation TRAFFIC-3A:
UC Santa Barbara shall provide a balanced transportation system on campus, offering vehicular, bicycle, pedestrian, and transit mobility. UC Santa Barbara shall consider intersection and roadway improvements as individual projects are constructed that require additional roadway capacity. Roadway improvements shall not conflict with existing or planned pedestrian and bicycle facilities or degrade mobility for pedestrians and bicyclists traveling on campus. Improvements shall be implemented as necessary to maintain campus roadways at a LOS no worse than as shown on Table 4.13-44.

   COAST Comments: It is unclear how the University plans to provide a “balanced transportation system”. There are no specific plans identified as to the mitigations that “shall” be provided. Intersections that are already operating at suboptimal LOS are likely due to previously unmitigated impacts from the University and should be addressed before the proposed LRDP is implemented. The University indicates that “improvements shall be identified”, which is vague,
and does not indicate any commitment to implementing or funding those improvements which is necessary. To say that roadway improvements “shall not conflict with existing...facilities” is a confusing claim, especially considering the plan to remove currently high-functioning bicycle routes such as the Pardall Tunnel.

LRDP Impact TRAFFIC-4: The proposed UC Santa Barbara LRDP would increase daily traffic volumes using City of Goleta roadways resulting in degraded LOS conditions under 2025 Plus Project conditions.

LRDP Mitigation TRAFFIC-4A
(1) Enhance and promote existing transportation demand management measures and develop new measures to reduce travel by single occupant vehicles to achieve an overall reduction of 10% of trips to and from campus (measured against the anticipated LOS in Tables 4.13-39, 4.13-41 & 4.13-48).

COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A

(2) Within one year of LRDP approval and annual thereafter, monitor traffic conditions on campus and at impacted nearby City and County intersections and roadways. Monitoring will include the intersections and roadways analyzed in the traffic modeling effort for this EIR, specifically those set forth in Table 4.13-39, 4.13-41 & 4.13-48.

COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A

(3) Work with the Cites, County, SBCAG, and SBMTD and other transit providers to determine appropriate transportation improvements, for providing mitigating offsets to increased traffic (e.g. transit stops, bicycle paths, transit subsidies).

COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A

(4) Contribute to the City of Goleta and County of Santa Barbara the University’s proportionate share of mitigating significant impacts to intersections and roadways identified in Tables 4.13-39, 4.13-41 & 4.13-48 due to 2008 LRDP traffic increases. Contributions made by the University that exceed its proportionate share of the cost of mitigating a particular impact or that mitigates more than its impact will be credited towards mitigation by the University of future impacts. The University’s payment will be made available to the jurisdiction no later than the start of construction or when implementation of the improvement is reasonably certain.

COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A

LRDP Impact TRAFFIC-5: The proposed UC Santa Barbara LRDP would increase daily traffic volumes using Santa Barbara County roadways resulting in degraded LOS conditions under 2025 Plus Project conditions

LRDP Mitigation TRAFFIC-5A:
(1) Enhance and promote existing transportation demand management measures and develop new measures to reduce travel by single occupant vehicles to achieve an overall reduction of 10% of trips to and from campus (measured against the anticipated LOS in Tables 4.13-39, 4.13-41 & 4.13-48).

COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A

(2) Within one year of LRDP approval and annually thereafter, monitor traffic conditions on campus and at impacted nearby City and County intersections and roadways.
Monitoring will include the intersections and roadways analyzed in the traffic modeling effort for this EIR, specifically those set forth in Table 4.13-39, 4.13-41 & 4.13-48.

**COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A**

(3) Work with the Cities, County, SBCAG, and SBMTD and other transit providers to determine appropriate transportation improvements, for providing mitigating offsets to increased traffic (e.g. transit stops, bicycle paths, transit subsidies).

**COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A**

(4) Contribute to the City of Goleta and County of Santa Barbara the University’s proportionate share of mitigating significant impacts to intersections and roadways identified in Tables 4.13-39, 4.13-41 & 4.13-48 due to 2008 LRDP traffic increases. Contributions made by the University that exceed its proportionate share of the cost of mitigating a particular impact or that mitigates more than its impact will be credited towards mitigation by the University of future impacts. The University’s payment will be made available to the jurisdiction no later than the start of construction or when implementation of the improvement is reasonably certain.

**COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A**

**LRDP Impact TRAFFIC-6:** The proposed UC Santa Barbara LRDP would increase peak hour traffic volumes on Caltrans freeway facilities resulting in degraded LOS conditions under 2025 Plus Project conditions.

**LRDP Mitigation TRAFFIC-6A:**
(1) Enhance and promote existing transportation demand management measures and develop new measures to reduce travel by single occupant vehicles to achieve an overall reduction of 10% of trips to and from campus (measured against the anticipated LOS in Tables 4.13-39, 4.13-41, 4.13-48 & 4.13-50).

**COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A**

(2) Within one year of LRDP approval and annually thereafter, monitor traffic conditions on campus and at impacted nearby City and County intersections and roadways. Monitoring will include the intersections and roadways analyzed in the traffic modeling effort for this EIR, specifically those set forth in Tables 4.13-39, 4.13-41 & 4.13-48.

**COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A**

(3) Work with the Cities, County, SBCAG, Caltrans, and SBMTD and other transit providers to determine appropriate transportation improvements, for providing mitigating offsets to increased traffic (e.g. transit stops, bicycle paths, transit subsidies).

**COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A**

(4) Contribute to the City of Goleta, County of Santa Barbara and Caltrans the University’s proportionate share of mitigating significant impacts to intersections and roadways identified in Tables 4.13-39, 4.13-41, 4.13-48 & 4.13-50 due to 2008 LRDP traffic increases. Contributions made by the University that exceed its proportionate share of the cost of mitigating a particular impact or that mitigates more than its impact will be credited towards mitigation by the University of future impacts. The University’s payment will be made available to the jurisdiction no later than the start of construction or when implementation of the improvement is reasonably certain.

**COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A**

**LRDP Impact TRAFFIC-7:** The proposed UC Santa Barbara LRDP would increase bicycle and pedestrian travel on campus and modify existing bicycle facilities, which could increase bicycle and pedestrian congestion
LRDP Mitigation TRAFFIC-7A:
UC Santa Barbara shall implement the proposed bicycle improvements identified in the LRDP, continue to provide an extensive bicycle and pedestrian network on campus, and monitor conflicts between the various modes of travel on campus.

COAST Comments: Pedestrian and Bicycle LOS should be considered and evaluated for the current LRDP. Because 49% of students bike and 21% walk to campus, the impacts to these travel modes should be considered thoroughly when evaluating intersections.

The LRDP mentions pedestrian and bicyclist impacts on vehicles but more consideration should be given to the impact of vehicles on pedestrians and bicyclists as main travel modes. The University seeks to remove the high functioning bicycle route known as the Pardall Tunnel even noting that, “the elimination of the tunnel would result in a less attractive route for bicyclists”. The Tunnel should be maintained and the additional proposed connections through Ocean Road should be implemented. The University should identify specifically how it plans to create the seven connections through Isla Vista as this is a main corridor for students, staff and faculty traveling to and from campus.

The elimination of the Pardall Tunnel inconveniences bicyclists in an attempt to improve vehicle circulation at the expense of bicyclist and pedestrian safety. The University has stated that it is working towards a balanced transportation system but actions such as this are contrary to those claims when vehicles are prioritized.

LRDP Impact TRAFFIC-8: The proposed UC Santa Barbara LRDP would increase transit ridership in the vicinity of campus.

LRDP Mitigation TRAFFIC-8A:
UC Santa Barbara shall work with the Santa Barbara Metropolitan Transit District in conjunction with the City of Goleta and Santa Barbara County to determine the appropriate transportation improvements, such as roadway widening, improved bicycle and pedestrian facilities, or enhanced transit service, to accommodate campus growth proposed under the LRDP.

COAST Comment: As in previous mitigations, “shall work” only indicates process and does not identify outcomes. Transit is a key element to a balanced transportation system. Furthermore, impacts to the transit system cannot simply be absorbed by SBMTD and UCSB should be responsible for mitigating these affects by providing increased funding to SBMTD, or providing its own system of shuttles and/or vans for students, staff and faculty. It is important to consider not just travel to and from campus but also the need for students, faculty and staff living in campus housing (and presumably not owning a vehicle) to travel to services such as the Calle Real Marketplace. The indirect growth effects, which are inadequately addressed in the REIR will also have an impact on service as more people working in the service industry and family members will be traveling to and from campus.

LRDP Impact TRAFFIC-9: The proposed 2008 LRDP would increase parking demands on campus primarily for new student, faculty, and staff residents.

LRDP Mitigation TRAFFIC-9A: UC Santa Barbara shall provide residential parking on campus as proposed in the LRDP and continue to conduct yearly parking surveys to monitor parking utilization rates for on-campus parking lots.

COAST Comments: Without more detailed and enforceable mitigations, there will not be sufficient on campus parking. Reducing the amount of available parking is only one part of a
suite of ways to decrease SOV use in and around campus.
Also, this does not indicate the purpose of conducting parking surveys or what actions will be taken based on the results of surveys.

**LRDP Impact TRAFFIC-10**: The proposed UC Santa Barbara LRDP would increase parking demands in Isla Vista.

**LRDP Mitigation TRAFFIC-10A**: UC Santa Barbara shall contribute its fair-share towards the implementation of a parking permit program in Isla Vista.

**COAST Comments**: An Isla Vista resident parking permit program should be considered again. The increased potential for increased parking demand in Isla Vista as the University does not plan to significantly increase the number of parking spaces on campus and the spillover is likely to increase.

Additionally, Table 4.2-16 (Page 4.2-47) suggests, in SP-7: Transportation, that UCSB “develop transportation strategies that … while providing opportunities for alternative transportation…”. The section does not indicate that developed … strategies will ever be implemented successfully, or when. The section similarly does not indicate prioritizing those “opportunities” for alternative transportation, let alone a timeline for success.

**Additional Proposed Mitigations**

All Class One transportation and circulation impacts, and most air quality impacts, could be reduced to levels of insignificance under CEQA if UCSB agreed to execute proposed LRDP capital, personnel, and enrollment expansion without addition of any new vehicular trips to the campus area, or the south coast Santa Barbara region, within the life of the new LRDP. The cost, tools, and capital improvements needed for these reductions would be less than the projected cost, time delay, and environmental impacts of the vehicle-centric capital improvements proposed in the draft EIR to (unsuccessfully) mitigate traffic impacts by physically accommodating and encouraging them.

A more aggressive Transportation Demand Management option, to reduce total UCSB traffic by 1.5% for every 1% of LRDP growth, could also allow the University to reduce its transportation-circulation-air quality Class One impacts below the level of legal CEQA significance. Such reductions must be concurrent to, or preceding, expansion phases under the LRDP, to be legally valid. In a modified cap and trade program, the University could choose from a variety of potential mitigation measures to create a suite of options to meet their targets.

**Some of the proposed mitigations could include:**

a) Phasing in, over a four-year period, a total UCSB ban on undergraduate students bringing cars with them. Exceptions to be made on a case-by-case basis relating to A.D.A., or work-related, “special needs”;

b) Resident permit parking programs for Isla Vista, Phelps Road, residential areas immediately west of Storke Road. Exceptions to be made for visitor daytime parking in Isla Vista within two blocks of the ocean, beginning five blocks west of UCSB’s Ocean Road east campus;

c) Stringent memoranda of understanding (MOUs) with: the CA Dept. of Motor Vehicles, the CA Highway Patrol, the SB County Sheriff’s Foot Patrol, Sheriff’s office, and Transportation divisions for active enforcement; of the Resident Permit Parking, Coastal Access Visitor Parking, student vehicle ban;
d) More stringent enforcement of UCSB-related parking at the southerly end of Goleta Beach County Park;

e) Expansion of Traffic Solutions ride-share, carpool, car share, vanpool programs on campus, and in Isla Vista to include cars at on campus housing nodes;

f) Expansion of the Vista and Clean Air Express freeway commuter express service with a negotiated group-rate for UCSB students, faculty, staff;

g) Expansion of SB MTD regularly scheduled service connecting UCSB and Isla Vista with the surrounding community;

h) Extension and expansion of existing UCSB-SB MTD pass programs to continue coverage of all students and extend benefits to faculty and staff;

i) Expansion of UCSB’s existing shuttle fleet to provide more trips now left to single occupant vehicle drivers to include connectivity to Camino Real Marketplace and the Goleta Train Station;

j) Aggressive expansion of staggered work hours and flex-time working conditions and tele-commuting, where congruent with job descriptions;

k) Modification of classroom schedules and standardized staff work-hours to make them more amenable to the above alternative travel modes;

l) “Developer fees,” based on the Institute of Transportation Engineering (ITE) Manual trip-generation factors, for each new UCSB capital expansion within the LRDP; fees to be pooled to help fund the traffic mitigation and offset programs (Stanford University can be used as successful example);

m) Reduce planned new campus parking structures by 50% below levels now listed in the LRDP, to dissuade future single occupant vehicle trips to/on campus;

n) Budget a fee for existing parking lots, to help fund non-vehicle alternatives;

o) Offer “incentive bonuses” within future negotiated UCSB workforce labor contracts to reward all faculty and staff who shift work trips to campus away from single occupant vehicle trips;

p) Negotiate memoranda of understanding with the Santa Barbara County Association of Governments, the CA Transportation Commission, the CA Air Resources Board, the CA Energy Commission, and the U.S. Dept. of Transportation to expand, prioritize, and incentivize all UCSB LRDP programs which seek to reduce current, and future predicted, motor vehicle use, to help fund all such projects and programs, and their proper staffing.

q) More close-in or on-campus student, faculty, staff new housing, to make trips to/from work or classrooms more amenable to walking, biking, or bus.

r) Increased commercial and retail use in and around campus housing to decrease trip generation
Conclusion

While the re-circulated LRDP EIR’s transportation, circulation, and air quality sections contain many charts and much discussion of future impacts, not enough space or ingenuity is devoted to aggressive, real-world efforts to fully mitigate the (properly) identified Class One impacts, as required by CEQA.

The University has dismissed the idea of a reduced enrollment alternative and has failed to seriously consider any viable alternatives. Therefore, this draft EIR should NOT be certified, in its present form.

Universities from Cal-Berkeley to Stanford to UCLA to CalTech to UC Davis here in California all effectively employ trip reduction and mitigation strategies far more innovative than those found in the LRDP EIR.

Successful “urban” research universities like Columbia, Harvard, MIT, University of Chicago, Georgetown, Johns Hopkins, Colorado-Boulder, University of Virginia all similarly feature more effective disincentives to personal motor vehicles on or near their campuses, and more creative funding mechanisms to assist their students, faculty, and staff to fully participate in campus and community activities without extensive single occupant vehicle use.

The Coalition for Sustainable Transportation (COAST) reluctantly concludes that the draft EIR’s sections on transportation, circulation, air quality still do not meet the full intent of the CA Environmental Quality Act’s high standard for identifying and mitigating to the greatest reasonable and feasible extent possible adverse, Class One impacts.

COAST is willing and eager to work with UCSB to help them meet the state standard, so that the LRDP can be adopted as quickly as possible, consistent with a full suite of successful impact mitigation strategies.

Respectfully,

Eva Inbar, COAST President
Response to Comment R-4-1. The specificity of the language in the mitigation measures is appropriate for a program-level document. Individual projects proposed under the 2010 LRDP will be subject to review under CEQA, and project-specific mitigation will be identified where appropriate.

Response to Comment R-4-2. Mitigation Measure TRAFFIC-1 sets a performance standard of reducing single-occupancy vehicle use by 10%; thus, particular word choices will not alter the measure’s effects. For example, enhancement may be read to be a broader term that includes both expansion and other measures that will promote alternative transportation use. The “anticipated LOS” is a projected value, and is listed for the relevant road segments and intersections in Tables 4.13-39, 41, and 48.

Response to Comment R-4-3. The Mitigation Monitoring and Reporting Plan, included in the Final EIR, identifies who will be responsible for monitoring traffic operations. This effort will be managed by UCSB Campus Design and Facilities and performed by transportation personnel. Additional measures noted in the comment, especially transportation demand management measures, are already included in mitigation TRAFFIC 1A:

(1) Enhance and promote existing transportation demand management measures and develop new measures to reduce travel by single occupant vehicles to achieve an overall reduction of 10% of trips to and from campus (measured against the anticipated LOS in Tables 4.13-39, 4.13-41, and 4.13-48).

and

(3) Work with the Cites, County, SBCAG, and SBMTD and other transit providers to determine appropriate transportation improvements, for providing mitigating offsets to increased traffic (e.g. transit stops, bicycle paths, transit subsidies).

Response to Comment R-4-4. The LRDP EIR identifies program-level mitigation. Individual projects will be subject to further environmental review, and project-specific mitigation measures will be identified at that time if appropriate. The University does not have jurisdiction to implement regional strategies without the assistance of other agencies; therefore, and implementing these measures will depend on cooperation among multiple agencies. Nevertheless, as required by CEQA, The Regents will adopt a mitigation monitoring and reporting program at the time of approval of the 2010 LRDP that will specify responsibility for monitoring and reporting on implementation of the adopted mitigation measures.

Response to Comment R-4-5. A “significant effect on the environment” (i.e., significant impact) is defined in State CEQA Guidelines Section 15382 as a substantial adverse change in the existing physical conditions within the affected area. Accordingly, feasible mitigation is applied to significant impacts caused by the proposed project when compared to the existing physical conditions (CEQA Guidelines Section 15125), not to past physical conditions. Regarding the timing of the University’s contribution to improvements for significantly-impacted infrastructure, please see Master Response – Traffic Fair Share Mitigation.

Response to Comment R-4-6. Please see response to comment R-4-2 through R-4-5.
Response to Comment R-4-7. Please see response to comment R-4-4 above. The impacts of LRDP development on bicycle circulation are discussed in RDEIR Impact TRAFFIC-7.

Response to Comment R-4-8. Please see response to comments R-4-2 through R-4-5.

Response to Comment R-4-9. Please see response to comments R-4-2 through R-4-5.

Response to Comment R-4-10. Please see response to comments R-4-2 through R-4-5.

Response to Comment R-4-11. The impacts of LRDP development on bicycle circulation are discussed in Impact TRAFFIC-7. Regarding closure of the Parnell tunnel, please see response to comment R-1-6. As stated in response to comment R-4-1, above, the specificity of the language in the mitigation measures is appropriate for a program-level document. Individual projects proposed under the 2010 LRDP will be subject to review under CEQA, and project-specific mitigation will be identified where appropriate. Accordingly, the specific means of implementing each of the seven proposed connections to Isla Vista will be analyzed at a project-level when the connections are proposed. The following is excerpted from the LRDP EIR Transportation Section (p. 4.13-27):

"The LRDP proposed to provide five new bicycle and pedestrian connections between Isla Vista and the main campus along Ocean Road. The connections would occur at El Greco, Cordoba, Madrid, Seville, and Sabado Tarde. The existing bicycle connections at Picasso and Trigo would continue to provide access between Isla Vista and the Main Campus. With the construction of the proposed connections, the existing grade separated crossing at Pardall providing access between the main campus and Isla Vista would be removed. The bicycle and pedestrian circulation improvements are shown in Figures 3-12 and 3-13, respectively, and summarized below.

- Shared bike route along the southern section of Ocean Road
- Completion of the Broida expressway on the main campus
- Realigned shared path on the proposed east-west roadway through Storke campus
- New north-south shared bike route on the new roadway between Ucen Road and Channel Island Road
- Shared bike routes as part of the proposed Storke Apartments, West Campus Apartments, Facilities Management Housing, West Campus Housing, and Santa Ynez Apartment sites
- New walkway along Devereux Road in West Campus
- New pathway along the coastal bluff with new stairway to beach east of Coal Oil Point to replace degraded existing dirt paths"

Response to Comment R-4-12. With regard to the specificity of mitigation language, please see response to comment R-4-1. By including the University, the Santa Barbara Metropolitan Transit District, the City of Goleta, and Santa Barbara County, Mitigation Measure TRAFFIC-8A acknowledges the fact that such regional planning efforts can only occur with the collaboration of multiple jurisdictions. Transit planning is interdependent on land use planning, and since transit is a regional service, it involves addressing land use at the regional level. The following is excerpted from the Transportation Section (p. 4.13-158, 159):

"Since new students, faculty, and staff would reside in on-campus housing, they are expected to use transit for less than 5 percent of existing trips between the housing complexes and the Main Campus based on existing ridership data for those residing in the Goleta and Isla Vista areas. Therefore, this impact would be less than significant.

Although the increase in transit ridership would not be significant, UC Santa Barbara proposes to reconfigure the Ocean Road bus loop to improve transit service, and to continue to work with SBMTD to provide bus service to campus."
Transit ridership could also increase between the proposed housing complexes and destinations outside of the campus, such as shopping and off-campus work trips. Therefore, future transit routes should consider changes and increases in ridership demands.”

Also, please note that the University provides several programs for alternative transportation (see page 4.13-46), and would continue to do so in the future, in addition to any collaboration with the MTD. Please see responses to comments A-12-36, A-12-48 and A-13-1.

Response to Comment R-4-13. Please see the discussion of Impact TRAFFIC-9 on RDEIR pages 4.13-162 to -163. The parking program in the LRDP is sufficient to meet demand generated by growth under the LRDP. This impact is less than significant.

Response to Comment R-4-14. As stated on pages 4.13-160 and -161 of the recirculated Transportation Section:

“Several years ago Santa Barbara County in cooperation with UC Santa Barbara proposed a parking permit program for Isla Vista. The program was not approved by the California Coastal Commission and it has not been resubmitted by the County. Because the parking permit program is outside the responsibility and jurisdiction of UC Santa Barbara, this impact is considered significant and unavoidable.”

The University continues to support a resident parking program in Isla Vista and, as required by Mitigation Measure TRAFFIC-10A, it is committed to a fair-share contribution for its future implementation. However, the authority to propose and implement such a program rests with Santa Barbara County, and the Coastal Commission also must approve it. Thus, the impact is considered significant and unavoidable, because it is not within the jurisdiction of the University. To clarify, TRAFFIC-10A has been amended as follows:

LRDP Mitigation TRAFFIC-10A: UC Santa Barbara shall contribute its fair-share towards the implementation of a parking permit program in Isla Vista. The University shall encourage the County of Santa Barbara to propose the program.

Response to Comment R-4-15. For the reasons stated in the analyses of Air Quality (RDEIR Section 4.2) and Transportation and Circulation (RDEIR Section 4.13), reduction of all impacts to less-than-significant levels is not feasible. Please see response to comment I-36-13 regarding the effectiveness of the Campus’ traffic demand management program.

Response to Comment R-4-16. Please see response to comment A-12-49.

Response to Comment R-4-17. Please see response to comment R-4-14.

Response to Comment R-4-18. Comment noted.

Response to Comment R-4-19. Please see responses to comments A-12-48 and A-13-1 for actions which the University will undertake to mitigate traffic impacts. In response to the suggested measures, Mitigation Measure TRAFFIC-1A(1) has been amended as follows:

LRDP Mitigation TRAFFIC-1A: (1) Enhance and promote existing transportation demand management measures and develop new measures to reduce travel by single occupant vehicles to achieve an overall reduction of at least 10% of trips to and from campus (measured against the anticipated LOS in Tables 4.13-39, 4.13-41, and 4.13-48). Measures may include, but
are not limited to, the University’s participation in one or more of the following programs:

(A) an expansion of SBCAG’s Traffic Solutions ride-share, carpool, and vanpool programs on campus and in Isla Vista to include cars at on-campus housing nodes;

(B) a negotiated group-rate with SBCAG and the Ventura County Transportation Commission to provide for UCSB students, faculty, and staff for the Clean Air Express and VISTA Coastal Express services, respectively;

(C) coordination with the MTD to maintain and improve scheduled service connections between UCSB, Isla Vista, and the surrounding community;

(D) the maintenance or expansion of the MTD pass programs to continue coverage of all students and extend benefits to faculty and staff;

(E) the maintenance or expansion of the University’s existing shuttle fleet to include connectivity to Camino Real Marketplace and the Goleta Train Station.

Response to Comment R-4-20. Comment noted.

Response to Comment R-4-21. Please see the Master Response - Traffic Fair Share Mitigation describing the form of the University’s monetary contribution to mitigating impacts on area roadways and intersections.

Response to Comment R-4-22. As stated in the LRDP (p. E.6), while the University recognizes the need to improve air quality and the environment (and is doing so by housing all direct growth on campus without expanding the campus footprint), a number of campus affiliates will still use cars to carry out certain activities. The LRDP proposes to provide sufficient housing on campus so that future students, faculty, and staff do not need to use their cars to commute to work or classes. Some students, faculty, and staff, as well as visitors, will continue to use cars. The Campus must therefore provide parking to avoid overburdening surrounding communities. See LRDP at E.6. The LRDP proposes to achieve this through consolidation of lots, formalization of informal parking areas, construction of parking structures, and development of new lots. Severely reducing on-campus parking would simply shift parking to neighboring communities and would not reduce the environmental impacts of development under the LRDP. To complement the parking program, the LRDP proposes improvements to infrastructure serving alternative transportation. Please also see responses to comments A-12-48 and A-13-1 regarding transit planning.

As discussed in RDEIR Impact TRAFFIC-10, a residential parking permit program would also reduce this impact, but is not within the jurisdiction of the University to implement. See also LRDP page E.8.

Response to Comment R-4-23. Campus parking fees are used, in part, to fund the Transportation Alternative Program (TAP), which provides subsidized access to the MTD system for faculty and staff.
Response to Comment R-4-24. Faculty and staff are already given incentives to eliminate commuting to campus by single occupancy vehicles through the TAP. Please see Mitigation Measure TRAFFIC-1A(1), as amended in response to comment R-4-19, above, which requires the campus to implement a Transportation Demand Program that will reduce vehicle trips by at least 10% by, among other measures, limiting single occupancy vehicle trips.

Response to Comment R-4-25. Please see response to comment R-4-19.

Response to Comment R-4-26. As noted above, all development will occur on campus without expanding the campus footprint, and nearly all developments will be connected to the bicycle and pedestrian networks proposed in the LRDP (see EIR Figures 4.13-4A and 4.13-4B).

Response to Comment R-4-27. Although the LRDP proposes minor increases in commercial and retail uses on campus, providing a full range of retail land uses is not within the objectives of the project.

Response to Comment R-4-28. DEIR Section 5.0 (Alternatives) compares four alternatives to the proposed LRDP. In addition to the mandatory No Project alternative, the EIR analyzes a Reduced Enrollment Alternative and two alternatives that have reduced physical facilities (the Virtual University and the No On-Campus Housing alternatives).
March 27, 2009

Alissa Hummer
Governmental Relations
University of California
Santa Barbara, CA 93106-2012

Dear Ms. Hummer,

The City of Santa Barbara has reviewed the Recirculated Sections of the 2008 UCSB Long Range Development Plan (LRDP) Draft Environmental Impact Report (DEIR) dated January 29, 2009. This document includes updated air quality, population/housing, transportation/circulation, water, and wastewater sections. The City previously sent a detailed comment letter dated June 23, 2008 on the 2008 LRDP and DEIR issued by the University in March 2008. It is our understanding that responses to these comments will be included in the Final Environmental Impact Report and are not yet available for review. The following comments are, therefore, limited to any new information submitted in the recirculated sections:

**Housing and Public Services**

UCSB, as the largest employer in the south coast area, plays a significant role in the demand for housing in the City through not only its faculty, staff, and students, but also through incidental growth associated with the expanding University. As the University is well aware, there are significant local concerns with the affordability of housing, the availability of housing, and diminished housing to jobs ratios in the Santa Barbara area. Similarly, the City and other neighboring jurisdictions have not assumed in our planning efforts that resources, including water and road capacity, would be needed to accommodate direct and indirect growth associated with increases in enrollment and other development proposed by the University in the 2008 LRDP. It is critical, therefore, that the University effectively mitigates to the extent feasible all of its impacts to housing, public services, and resources in the region.

Many of the City’s previous comments regarding housing and public services have not been addressed in the recirculated sections. Please refer to our letter dated June 23, 2008 for these specific comments. In particular, we would like to reemphasize the following:

- The measures proposed to mitigate potentially significant impacts to housing supplies from the 2008 LRDP encourage the University to construct housing to meet increases in enrollment within 4 years. However, there are no requirements in the 2008 LRDP or DEIR for any type of effective action (i.e. freezes on enrollment, reevaluation of the 2008 LRDP, etc) if monitoring shows a housing imbalance after four years. There are also no requirements proposed that the University limit enrollment or reevaluate
the 2008 LRDP if it turns out that site constraints (reduced height limits, biological and archeological resources, etc.) limit the overall projected amount of on-campus housing that will be available. While we agree that the mitigation currently proposed in the DEIR does not reduce impacts to housing supplies to less than significant levels, we believe feasible mitigation measures are available (i.e. capping enrollment with the number of bed-spaces) to mitigate this impact.

- We encourage the University to formulate a negotiated agreement with the City and other neighboring jurisdictions addressing the issue of affordable housing demand created by the 2008 LRDP.

- Given that the scope of the University’s impact on employment and housing demand in the region, it is critical that UCSB take a leadership role in addressing the regional housing problem through participation in and commitments made through the regional housing allocation process.

- We strongly encourage the University to mitigate any potential impacts to public services and our transportation system through financial commitments and participation in regional transportation planning efforts and agreements.

**Water Resources**

- There are a number of inconsistencies between the future water demand data provided in Section 4.14 and that provided in Appendix 4.14-1. Further, the aggregated future water demand data provided in Section 4.14 is presented in a manner so that a direct comparison with the breakdown of future water demand by campus development area provided in Appendix 4.14-1 cannot be made. For example, the “Total Future Additional Water Demand” of 856 AFY for the 2008 LRDP identified in Table 4.14-9 is not consistent with the “Additional Future Demand” of 755 AFY number presented in Table 11 of Appendix 4.14-1 because Table 11 only accounts for Main Campus development and no other discussion or table in the Appendix provides a full breakdown by each campus development area. Further, there is no “Appendix A” as identified in Section 4.14.2.3 of the Recirculated DEIR (page 4.14-30) that provides a complete breakdown of water demand for each of the service areas under the LRDP.

- Either Table 4.14-9 or Table 11 should incorporate a complete breakdown of the water demand by campus development area so that the reader can fully understand how the “Total Future Additional Water Demand” of 856 AFY in Section 4.14 was reached. Table 4.14-9 and Table 11 should also be modified to include the existing water allocation agreements from the Goleta Water District (GWD) in a manner that corresponds with the campus development area being assessed so that the reader can understand whether sufficient allocations already exist in these campus development areas or whether there is a shortfall that requires amended agreements with GWD.
Based on the incomplete data provided, it still appears that a deficit of approximately 300 AFY still exists for the Main Campus area (including both the areas served by the 1991 Water Reclamation Agreement and the 1993 Amended Water Agreement).

The recirculated document contains new information that Goleta Water District (GWD) is likely to have sufficient water supplies to meet the University’s future demand along with projected growth in the service area. However, the City’s concerns regarding Impact W-3 discussed in our letter dated June 23, 2008 remain. Goleta Water District has not provided any guarantee to the University that additional allocations will, in fact, be available to the University. While mitigation measure W-3G limits new development on campus if sufficient water supplies can not be obtained, the mitigation measure does not limit increases in enrollment or hiring of faculty and staff which could lead to direct and indirect increases in water demand. In the absence of this mitigation or guarantees of supply from GWD, Impact W-3 should be considered significant and unavoidable.

If you have any questions or concerns about our comments, please direct them to Melissa Hetrick, Environmental Analyst for the City of Santa Barbara at (805) 564-5470 or MHetrick@SantaBarbaraCA.gov. Thank you for the opportunity to comment on the Recirculated Sections of the DEIR. Please continue to keep us informed about the development and implementation of these documents.

Sincerely,

Paul Casey
Community Development Director

Cc: Mayor and Council
Planning Commission
Goleta Slough Management Committee
Jim Armstrong, City Administrator
Betty Weiss, City Planner
John Ledbetter, Principal Planner
Danny Kato, Senior Planner
Andrew Bermond, Associate Planner
Rob Dayton, Principal Transportation Planner
Debra Andaloro, Environmental Analyst
Melissa Hetrick, Environmental Analyst
Barbara Shelton, Environmental Analyst
Karen Ramídell, Airport Director
Daniel Singer, City Manager, City of Goleta
Kevin Walsh, General Manager, Goleta Water District
John McInnes, Long Range Planning Director, County of Santa Barbara
Jamie Goldstein, Redevelopment Agency Deputy Director, County of Santa Barbara
Letter R-5
City of Santa Barbara

3/30/2009

Response to Comment R-5-1. Please see response to comment A-10-1 and A-12-1 and Master Response – Housing and Population. Please see response to comment A-17-PD-5 regarding enrollment capacity.

Response to Comment R-5-2. Comments noted.


Response to Comment R-5-4. The RDEIR provides an analysis of cumulative water demand associated with buildout of the 2010 LRDP and compares that demand with water supplies available to the Goleta Water District. Accordingly, Chapter 4.14 of the RDEIR quantifies total projected demand without describing how that demand will be distributed among the Campus’s water service areas and contracts. Please see also Master Response – Water Supply section V.D. Appendix 4.14-1, however, quantifies projected future demand for each of the University’s water service areas and compares that projected future demand with each area’s current potable water use. The reference to “Appendix A” on page 4.14-30 has been corrected to read “Appendix 4.14-1.”

Response to Comment R-5-5. Please see response to comment R-5-4.

Response to Comment R-5-6. Please see response to comment R-5-4.

Response to Comment R-5-7. The University assumes that the Goleta Water District will treat the Campus as it treats other customers, and will provide water to the extent it is available and not committed to other uses. Regarding Mitigation Measure W-3G, please see Master Response - Water Supply, section VI.A.
Kelly Hildner  
6823 Silkberry Lane  
Goleta, CA 93117  

March 30, 2009  

University of California  
Office of Campus Planning & Design  
c/o Vision2025  
Santa Barbara, CA 93106-1030  

RE: Comments on the Recirculated Draft Environmental Impact Report  
for the Proposed 2008 Long Range Development Plan for the  
University of California at Santa Barbara  

The University plan continues to involve the addition of an unsustainably large number  
of people to the area as evidenced by the many significant impacts detailed in the EIR.  
The impacts to Goleta’s air quality, traffic, water supply, wastewater systems, and transit  
systems would be too great and would severely degrade the quality of life for Goleta  
residents. UCSB should pursue an alternative of adding fewer students.  

The mitigations that the University has proposed are inadequate.  

The University proposes to house all of the additional people on campus to minimize  
driving to campus. This would result in an excessive number of people being  
concentrated in some of the most sensitive areas of the coast, impacting both wetlands  
and coastal access.  

The University does not sufficiently address or mitigate the impacts of the movement of  
people between housing and shopping and other community services. A criticism of the  
previous draft was the lack of a comprehensive transit plan that would reduce traffic  
impacts by encouraging the use of alternative transportation. The current EIR pays lip  
service to alternative transportation but still does not include any concrete plan or funding  
commitments. Instead the plan continues to focus on road creation and expansion which  
would encourage single occupant vehicle (SOV) use, contribute to significant, avoidable  
air quality impacts, and degrade residential areas and bicycle and pedestrian access. The  
university should adopt more sustainable transportation mitigation measures such as  
those being proposed by the SUN Coalition and the Community Environmental Council.  

As a resident of Storke Ranch, I am particularly concerned about the impacts of the  
LRDP on my neighborhood, which is arguably the neighborhood that would be most  
impacted by the proposed development.  

According to the LRDP, the University plans to build additional multistory housing on  
three sides of the Storke Ranch neighborhood. This housing is out of scale with the
neighborhood and would significantly impact views, air quality, noise, water, traffic congestion, recreational facilities, and the many sensitive wetlands in the area. The University should limit the density and height of new buildings in these areas to densities and heights comparable to Storke Ranch in order to minimize significant impacts and maintain the character of the community. In addition, the University should create minimum 100 foot vegetated buffer areas between proposed developments and existing neighborhoods and wetland habitats.

I am particularly opposed to the proposed conversion of our peaceful, cul-de-sac community road, Phelps Road, into a throughway to the University. The University has received many letters, petitions, and comments opposing this proposed mitigation measure (the Phelps/Mesa connection), yet it remains in the current RDEIR as a transportation mitigation measure. CEQA Guideline § 15126.4(a)(1)(D) requires the RDEIR to analyze and disclose significant impacts created from mitigation measures, yet the current RDEIR fails to disclose significant impacts of the Phelps/Mesa connection as outlined in a letter to the University from attorney Marc Chytilo dated June 23, 2008.

The current DEIR acknowledges that completing the widening of El Colegio is a feasible alternative to the Phelps/Mesa connection. As this is an environmentally superior alternative, it should replace the Phelps/Mesa connection as a mitigation measure if the University insists on continuing its car-centric approach to transportation. However, rather than focusing on ways to make driving easier, the University needs to do more to discourage SOV use within the greater community and should adopt alternative mitigation measures that are being proposed by the SUN Coalition, the Community Environmental Council, and other groups concerned about sustainable transportation alternatives.

Thank you for the opportunity to comment on this recirculated DEIR.

Sincerely,

Kelly Hildner
Response to Comment R-6-1. Please see responses to comment R-1-3 and R-4-28.

Response to Comment R-6-2. The RDEIR’s analysis of traffic impacts takes account of all trips generated by new development, including non-commute trips. Among the mitigation measures related to traffic and circulation impacts is Mitigation TRAFFIC-8, which states:

“UC Santa Barbara shall work with the Santa Barbara Metropolitan Transit District in conjunction with the City of Goleta and Santa Barbara County to determine the appropriate transportation improvements, such as roadway widening, improved bicycle and pedestrian facilities, or enhanced transit service, to accommodate campus growth proposed under the LRDP.”

The mitigation measure, by including the University, the Santa Barbara Metropolitan Transit District, the City of Goleta, and Santa Barbara County, acknowledges the fact that such regional planning efforts can only occur with the collaboration of multiple jurisdictions. Transit planning is interdependent on land use planning, and since transit is a regional service, it involves addressing land use at the regional level. Please see responses to comments R-4-24 and R-4-26.

Response to Comment R-6-3. Please see Response to Comment A-12-51. The West Campus Apartments will be of no greater scale than the existing Santa Catalina towers (built in 1966), which existed prior to the Storke Ranch subdivision (built in 2000).

Response to Comment R-6-4. Please see Master Response - Phelps/Mesa Connection.

Response to Comment R-6-5. Please refer to the discussion starting on page 4.13-104 of RDEIR Section 4.13 Transportation and Circulation. Also, please see page RDEIR 4.13-119, which identifies the Mesa/Phelps connection as a means to alleviate traffic congestion along El Colegio Road and Hollister Road, as well as nearby intersections. These determinations assumed the widening of El Colegio. Please see the Master Response - Phelps/Mesa Connection for more information.
-----Original Message-----
From: UCSB Vision [mailto:info@ucsbvision2025.com]
Sent: Monday, March 30, 2009 4:53 PM
To: 'chang tk'
Subject: RE: Public Comment

Thank you for your comments/questions regarding the UCSB Long Range Development Plan. Your correspondence will be entered into the record and addressed within the formal response that will follow after the public comment period closes on 3/31/2009. If you would like to receive notice of future meetings and/or report releases and are not currently on our mailing list, please register on the project Web site, http://www.ucsbvision2025.com/contact.html. We appreciate your interest in UCSB.

-----Original Message-----
From: chang tk [mailto:tkcdesigns@me.com]
Sent: Monday, March 30, 2009 4:22 PM
To: info@UCSBVision2025.com
Subject: Public Comment

Monday March 30, 2009

Thank you for the opportunity to comment on what was released in public on March 12, 2009 (to the person who scheduled/authorized the Mar 12 public release UCSB meeting during Mid-Finals Week, shame on you ...).

As the totality of what appeared to be implied at the March 12, 2009 public release so took our breath away -- as an incoherent disjointed asphalt repair diagram with 1950's monolithic apartment towers does not a master site plan make, we are in the process of writing a detailed design review to the University of California Board of Regents with ideas for a 21st century world class university contender in energy and environmental design.

We hope to be sending this letter to the Board shortly with a copy to the State of California Coastal Commission and a copy to you as well.

Again, thank you and best wishes on this important public process and investments in our future infrastructure and brain power and creative capital.

Sincerely yours,

UC Alumna/SB Co Resident
Letter R-7
T.K. Chang

3/30/2009

Response to Comment R-7-1. Comments noted.
March 30, 2009

Vice Chancellor Gene Lucas
University of California
Santa Barbara, CA 93106-1030

RE: Recirculated DEIR for the UCSB Long Range Development Plan

Dear Vice Chancellor Lucas:

The City of Goleta appreciates the opportunity to comment on the Recirculated Draft Environmental Impact Report (RDEIR) for the Vision 2025 Long Range Development Project. The City provides these comments in recognition of our common planning area, our common public infrastructure, and our common natural resource setting. These comments, when taken together with our prior letters of June 21, 2007 and June 23, 2008, identify significant flaws with the RDEIR and the base DEIR. The City hereby attaches our prior comment letters and reiterates the concerns stated therein as they have not been fully addressed in the RDEIR. The City asks that the University properly address the issues as outlined in these comment letters, and that the University work with us on identifying and, ultimately, implementing ways that environmental damage can be avoided or substantially reduced.

First and foremost, I want to express the desire of the City to improve the dialogue with the University from the conversations conducted over the past year or more. The City is looking for a dialogue with the University that acknowledges and addresses our common needs, desires and issues as seen by our Goleta Valley residents and business interests. We hope for a dialogue that meaningfully respects the capacity of the valley’s natural resource systems, as well as the tolerances of the public infrastructure systems. There is only so much room and resources to go around, as is evidenced in the Draft LRDP, the County’s policy papers on an ongoing update of the Goleta Community Plan, and the City’s General Plan/Coastal Land Use Plan. This is an important opportunity for collaborative and integrated planning work, rather than isolation of interests.
City staff has reviewed the RDEIR in detail. The City’s comments are provided in two attachments, one that generally addresses air quality, population and housing, transportation and circulation, water supply, and wastewater, and one that addresses the traffic model. The City remains concerned about many issues, but there are three critical issues as follows:

1. The transportation/traffic modeling and, in particular, the assumptions that form the basis for the analysis, findings, mitigation measures and alternative considerations are fatally flawed. Reasonable worst case conditions are not properly identified, modeled and mitigated, as required under the California Environmental Quality Act. There is a gross underestimation of impacts that is caused by skewed assumptions on trip generation and distribution pattern. Sensitivity analysis on the model bears this fact out at several key road segments and intersections throughout the Goleta Valley.

2. The DEIR fails to address the extended effects on Goleta’s public infrastructure and services, particularly in the areas of public safety, emergency services, parks, roads, transportation systems, libraries, utilities, etc. The lack of such recognition and analysis of off-campus effects presents the unrealistic picture of a University expansion that is isolated, self-contained and self-mitigating. Nothing could be further from the truth.

3. The RDEIR does not sufficiently account for and fails to address the effects of student enrollment growth and faculty/staff employment growth absent concurrent mitigation. The document does not identify and analyze the relationship between the timing of growth and the development and occupancy of on-campus housing or the timing of service provisions that are vital to accommodate that growth. In our discussions, the University has refused to provide guarantees of financial backing for the mitigation measures that are identified. To allow growth impacts to precede the enactment of mitigation measures by several years, obfuscates the role of CEQA, the California Coastal Act, as well as the very nature of long range development planning envisioned under the California Government Code and shifts the burden of the project from UCSB to the residents of the Goleta Valley.

The technical attachments go into much greater detail on these and other points of concern. This second round of document-making presents a narrow posture of a University concerned with legal defensibility rather than accurate analysis of environmental impacts. The City of Goleta urges the University to reject such a posture and seize this important opportunity for meaningful dialogue, rational compromise, and partnership with the community at-large.
Vice Chancellor Gene Lucas
RE: Recirculated DEIR for the UCSB Long Range Development Plan
March 30, 2009
Page 3

Respectfully submitted,

[Signature]
Daniel Singer
City Manager

Enclosures
Attachment A: Technical Comments
Attachment B: Traffic Model Analysis

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   Michael Brown, County of Santa Barbara
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   James Armstrong, City of Santa Barbara

   Kamil Azoury, Goleta Sanitary District

   Eric Ford, Goleta Water District

   Goleta City Council
Introduction and Summary

Page 1.0-1 Section 1.2 - Air Quality Subsection. This section states that the Air Quality Section of the DEIR overstated vehicle emissions...and the air quality modeling has been adjusted accordingly. As indicated in the Transportation section comments in a following section of this attachment, the City disputes the transportation modeling and analysis assumptions. Specifically, a review of the RDEIR traffic model resulted in documentation (see Attachment B) of underestimation of impacts, both existing and future conditions. As a result, conclusions arrived at in the Air Quality Section 4.2 dependent upon the transportation data, are flawed and must be updated to reflect reasonable worst case conditions. The Final EIR must reflect reasonable worst case traffic conditions (see Transportation comments), therefore, necessitating changes to the air quality analysis beyond the scope defined in Section 1.2. Additionally, Section 1.2 Air Quality subsection must be updated to describe the additional analysis, plus document an impact level for Greenhouse Gas Emissions, with corresponding mitigation as none is provided in the technical section.

Page 1.0-2 Section 1.2 - Transportation Subsection. This section states that the Transportation section has been augmented to include further discussion of the University’s contribution to traffic congestion on area roadways and intersections... As elaborated in the Transportation section comments in a following section of this attachment, City staff disputes the transportation modeling and analysis assumptions. Specifically, a review of the RDEIR traffic model (see Attachment B) resulted in documentation of underestimation of impacts, both existing and future conditions. As a result, conclusions arrived at in the Transportation Section 4.13 are flawed and must be updated in the Final EIR to reflect reasonable worst case conditions. Section 1.2 Transportation subsection must be updated to describe the additional analysis, impacts, and mitigations.

Page 1.0-2 Section 1.2 – Water Supply Subsection. This section states that any shortfall in potable water supply would be small and alternative sources are identified to meet the potential shortfall. City staff disputes the assumptions that are built into the supply and demand analysis which results in an underestimation of impacts (demand) and overestimation of the resource (supply). As a result, conclusions arrived at in the Water Section 4.14 are flawed and must be updated in the Final EIR to reflect reasonable worst case conditions. Section 1.2 Water Supply subsection must be updated to describe the additional analysis, impacts, and mitigations. Refer to Section 4.14 comments for more detail.

Page 1.0-2 Section 1.2 – Wastewater Subsection. This section concludes that the impact to wastewater capacity is significant and unavoidable because the University would need to acquire additional capacity from sanitary districts in order to meet demand upon build out. This conclusion is not adequately established. City staff disagrees with this conclusion and believe with carefully crafted mitigation, the impact

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could be reduced to less than significant. Refer to Wastewater comments below for more detail. Section 1.2 Wastewater subsection should be updated to describe the mitigation and the reduced level of significance.

Page 1.0-4 Table 1.4 Summary of Impacts and Mitigation Measures. This table must be updated to reflect modifications that are necessitated to address comments and rectify deficiencies identified in this attachment.

**Air Quality**

Page 4.2-1. The second bullet point addresses a revision to the DEIR and states "URBEMIS2007 [was used] to estimate residential area sources and transportation sources rather than hand calculating vehicular emissions based EMFAC2007." As indicated in the Transportation comments below, City staff disputes the transportation modeling and resulting conclusions. Specifically, an underestimation of impacts is documented in Attachment B. As a result, the conclusions arrived at in the Air Quality section dependent upon the transportation data, may be significantly flawed and must be updated.

Page 4.2-23. LRDP Impact AIR-1 indicates that campus growth under the 2008 LRDP would result in daily operational emissions above the significance thresholds; may contribute to a violation of air quality standards or hinder attainment of the 2007 Clean Air Plan. To adequately attempt to mitigate this impact, the first sentence of LRDP Mitigation AIR-1B must be revised from "The LRDP shall support the full implementation" to "The LRDP will require the full implementation..."

Page 4.2-43 to 63. The RDEIR Air Quality section fails to identify cumulative impacts of the LRDP related to Greenhouse Gas Emissions and Climate Change as a potential impact. While there is significant discussion related to this topic, including the University's approach to addressing this issue to comply with recent State regulatory requirements, the Green House Gas (GHG). Significance Determination alone (page 4.2-61) is inadequate. In order for mitigation to be feasible, it must be included within a mitigation measure. As such, this EIR must detail a GHG impact (new impact AIR-7) and include a corresponding mitigation (new mitigation AIR-6). The mitigation measure could be the incorporation of additional LRDP policies CC-1 through CC-6, as presented in Sections 4.2.3.5 and 4.2.3.6. Significance levels must be expressly identified.

**Population and Housing**

Pages 4.10-1 and thereafter. While the document attempts to quantify the additional on-campus populations proposed to be accommodated by the LRDP, the RDEIR does not adequately identify the total additional on-campus populations that would result from implementation of the LRDP. For example, the population associated with the families
of married students, faculty, and staff (i.e. inclusive of spouses and children) is not estimated or included in the projected population figures. This underestimation of population will lead to a corresponding understatement of the level of significance of a wide range of environmental impacts that will occur as a result of the project. Impacts to the non-campus environment will be more profound in a number of areas, including but not limited to traffic, air quality, water and wastewater demand, public school enrollment and housing. In order for the RDEIR to be meaningful as an informational document, these impacts must be properly identified and analyzed. Revise the population projection to account for family members as noted above and modify the impacts and mitigation accordingly.

Page 4.10-2 and 4.10-3. Data for the 2007-2008 academic years is more current and therefore must be used as the current conditions baseline instead of 2006-2007. Use of the 2006-2007 data significantly understates the growth rate of student enrollment and the growth in the number of faculty and staff. For example, the 2006-2007 student enrollment data reports only 0.8% growth over the previous year while the 2007-2008 data represents 2.3% in growth over the previous year. Revise Table 4.10-1 and related text to reflect the 2007-2008 data. Modify impacts and mitigations accordingly.

Page 4.10-9. The first paragraph states “between the years 2007 and 2008, many of the cities in the County saw a growth rate of between 1.0 and 2.5 percent (including the City of Goleta). The City of Santa Barbara experienced growth at 1.2 %, while the County’s growth rate was approximately 1%.” The paragraph continues to list the annual growth rate of other cities within the County with no mention of the actual growth figure for Goleta. As currently written, the paragraph incorrectly infers an annual growth rate of up to 2.5% for Goleta, when the same Department of Finance figures cited in Table 4.10-9 document an annual growth rate of only 1% percent for Goleta for 2007-2008 and an annual net loss of 0.2% between 2005 and 2008. The implication that Goleta’s growth rate is the higher 2.5% deceptively exaggerates the City’s contribution to cumulative impacts such as traffic levels of service and correspondingly, erroneously appears to the cumulative impact contribution by the LRDP. Revise the setting to accurately represent the Goleta annual growth rate data in Table 4.10-9.

Page 4.10-16. Modify the Regional Housing section to reflect South Coast statistics. Include Goleta-specific data when including data specific to Isla Vista.

Page 4.10-16. The third paragraph under Regional Housing documents countywide vacancy rates at 6.7% in 2006. Update this number with 2008 data. Also, include the more relevant vacancy rate data for the South Coast, and for Goleta in particular, as it is more germane to the project. Vacancy rates in Goleta are well under 5%, a very relevant statistic. Failing to disclose this information undermines the informational value of the RDEIR.
Page 4.10-17 and -18. The Housing Projection section neglects to describe Goleta in the text and instead, focuses on the City of Santa Barbara. The City of Santa Barbara is significantly more built-out than Goleta, and is geographically further away from UCSB than Goleta. No justification is provided for the omission of this very relevant description. Expand the description to include Goleta.


Page 4.10-26. Section 4.10.2.2 Analytical Methods includes a description of assumptions and the LRDP Growth Summary in Table 4.10-21. Include a new column in the table to reflect the percent change from current to proposed future conditions for comparative purposes.

Page 4.10-29. LRDP Impact POP-1 concludes that “development under the 2008 LRDP would not directly cause substantial population growth in the area due to provision of adequate housing on campus.” Although the number of additional student family units would accommodate the percentage of graduate students who are living with partners or spouses (historically, approximately 14% of the total student population is at the graduate level and 34% are living with a spouse or partner = 238 of the new 5,000), the number of new student family units does not account for the number of graduate students who might be living with children but no spouse/partner, nor does it account for new undergraduate students living with a spouse, partner or children (3% of total or 150). An additional 150 family units would be needed to accommodate the undergraduate demand for family housing under the LRDP. Modify the impact accordingly.

Page 4.10-29. The last paragraph indicates that the LRDP plans for the addition of 300 additional faculty; however, Table 4.10-21 on page 4.10-26 indicates 336 additional faculty. The correct number should be clarified.

Page 4.10-30. LRDP Mitigation POP-3A (formerly POP-2A) remains inadequate. Specifically, the measure continues to set goals and not binding requirements. Furthermore, the measure allows the University four years to construct additional housing for each increment of new enrollment. This delay may lead to significant short-term housing impacts (shortages). In order to feasibly mitigate the impact, the mitigation must mandate enrollment controls and freezes to ensure enrollment is managed based on the number of housing units available. If construction of new units does not keep pace, then enrollment must be frozen or scaled back as necessary until completion of new housing units by the University. Unless there is a measurable, binding, and enforceable mitigation measure to assure that expansions of academic and support space (and increases in the numbers of students, faculty, and staff) do not outpace on-
campus housing development, significant adverse unmitigated impacts on adjacent communities, including Goleta, is foreseeable and likely. This off-campus impact must be identified, quantified and mitigated. Additionally, this mitigation measure should eliminate "apartment complexes" from the mitigatory action. If the University were to lease or otherwise acquire existing apartment complexes in the City of Goleta, non-University residents would be displaced. The displacement of City residents would be a significant impact. A second, potentially significant impact would be created because the displacement of residents would exacerbate the housing shortage within the City and surrounding communities. Create a new mitigation measure accordingly.

Page 4.10-38. The second paragraph refers to a Mitigation POP-2A which does not appear to exist. Correct the error.

Transportation

Section 4.13 (Traffic Analysis Overview Comments). The traffic analysis presented in Section 4.13 of the RDEIR is based upon a traffic model that was derived from the City of Goleta's General Plan traffic model. The City's model was calibrated on actual traffic counts collected in 2003-2005. The use of the City's calibrated traffic model to determine future traffic impacts associated with the proposed LRDP is appropriate and supported by the City. The LRDP EIR consultant team made several changes to the City's traffic model to create the LRDP traffic model. The LRDP traffic model was then calibrated on more recent traffic counts and used to forecast future traffic conditions associated with the proposed LRDP. The results of the LRDP traffic model were used to identify project specific and cumulative traffic impacts as well as mitigation measures pursuant to CEQA. This is a standard practice that the City supports. However, many of the changes incorporated into the LRDP traffic model are based on assumptions that do not meet the CEQA test of "reasonable worst case". The cumulative effect of these changes result in significant reductions to the LRDP model generated baseline traffic conditions and future forecasted trip generation amounts. This in turn results in an incorrect assumption of current traffic conditions and an underestimation of future traffic impacts associated with the proposed LRDP. As such the RDEIR fails to adequately identify and mitigate the Project's impacts on traffic (and air quality) pursuant to CEQA guidelines section 15126.2(a).

In order to better understand how the changes incorporated into the LRDP traffic model affect future traffic volume forecasts, the City hired a well known traffic model consulting firm, Dowling Associates, Inc., to review the LRDP traffic model and the traffic analysis presented in the RDEIR. A copy of a technical memorandum from Dowling Associates (dated March 16th) is provided in Attachment B to this comment letter and is incorporated herein by reference.
Section 4.13 and Appendix 4.13-3 (Traffic Model Calibration General Comments). The City is pleased that the revised RDEIR includes documentation on the process used to calibrate the LRDP traffic model. A comprehensive calibration process is a critical step in assuring that a traffic model correctly reflects baseline traffic conditions before being used to forecast future traffic conditions. Appendix 4.13-3 of the RDEIR includes a detailed description of the LRDP traffic model validation process. The LRDP traffic model validation results are compared to the City’s General Plan traffic model validation results to support the determination that LRDP model meets certain validation criteria and that is as good as or better than the model it is derived from. This is a standard practice that the City supports. However, while the LRDP model meets certain validation criteria based on a holistic statistical analysis of 147 roadway sections, it fails to meet the allowable deviation (difference between actual traffic counts and model generated counts) at 14 roadway locations. This number of roadways not meeting the allowable deviation in itself is not significant. However, when you consider which roadways fail and the magnitude by which the baseline LRDP traffic model underestimate the current traffic volumes on these roadways, the entire RDEIR traffic analysis, traffic impact identification, and mitigation is called into question.

The roadways of particular concern to the City of Goleta are Storke Road, Los Carneros Road and Fairview Avenue. These roadways are the City’s primary north-south arterials that provide access to and from UCSB. As such they are the roadways most impacted by the future traffic growth associated with the LRDP. The RDEIR has identified these roadways as locations where project specific and cumulative traffic impacts will occur. Another roadway of concern due to current capacity limitations is Calle Real.

Attachment H to Appendix 4-13.3 of the RDEIR is a table that lists information on each roadway section included in the LRDP traffic model validation effort. The validation information provided on sections of the above referenced roadways is summarized in the below table:

<table>
<thead>
<tr>
<th>Roadway Section</th>
<th>Traffic Count</th>
<th>LRDP Model Volume</th>
<th>Difference</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Storke Road</td>
<td>756</td>
<td>518</td>
<td>-238</td>
<td>-31.5%</td>
</tr>
<tr>
<td>Los Carneros Road</td>
<td>750</td>
<td>326</td>
<td>-424</td>
<td>-56.5%</td>
</tr>
<tr>
<td>Fairview Road</td>
<td>1949</td>
<td>1725</td>
<td>-224</td>
<td>-11.5%</td>
</tr>
<tr>
<td>Calle Real</td>
<td>374</td>
<td>69</td>
<td>-305</td>
<td>-81.6%</td>
</tr>
</tbody>
</table>

As shown above the LRDP model volumes are significantly lower than the measured traffic counts taken at several critical roadway locations where current capacity issues exist. Since the LRDP baseline model volumes are used to forecast future traffic volumes the differences shown above are carried forward in the LRDP forecasted model volumes. This results in a significant underestimation of future traffic volumes.
and impacts to critical roadway facilities in the City of Goleta. Until LRDP traffic model is calibrated to better reflect actual traffic counts on roadways where traffic impacts due to traffic growth are expected, the RDEIR fails to adequately identify and mitigate impacts pursuant to CEQA.

Section 4.13 and Appendix 4.13-3 (LRDP Model Land Use Assumptions for UCSB). The data presented in Section 4.10 Population and Housing of the RDEIR cites the following UC-Affiliated Populations information for the 2006-07 academic year at UCSB:

- 21,082 Total Students (total enrollment irrespective of full or part time status)
- 20,556 Full Time Equivalent (students enrolled for at least three quarters)
- 9,500 Faculty and Staff (includes full and part time employees)
- 6,000 Faculty and Staff Full Time Equivalent

The source of this information is the annual Campus Profiles prepared by the Office of Institutional Research and Planning at UCSB. As stated in the RDEIR and in accordance with the UC CEQA Handbook, total students (full and part time) and total employees (full and part time) are used for CEQA and the RDEIR to analyze significant effects on the environment.

The following table compares the number of UCSB students and employees identified in the population and housing section of the RDEIR to numbers used in the LRDP traffic model and the City's General Plan model.

<table>
<thead>
<tr>
<th>Land Use Parameter</th>
<th>UCSB IRP 2006-07</th>
<th>City Calibrated Model Baseline 2005</th>
<th>LRDP Baseline 2005-06</th>
<th>City Model General Plan 2030</th>
<th>LRDP No-Project 2030</th>
<th>LRDP Final 2030</th>
</tr>
</thead>
<tbody>
<tr>
<td>UCSB Students</td>
<td>21,082</td>
<td>19,039</td>
<td>16,530</td>
<td>25,000</td>
<td>16,530</td>
<td>18,046</td>
</tr>
<tr>
<td>UCSB Employees</td>
<td>9,500</td>
<td>9,529</td>
<td>4,689</td>
<td>11,400</td>
<td>4,685</td>
<td>6,385</td>
</tr>
</tbody>
</table>

^UCSB reflects baseline levels (2006-07) with all other areas reflecting 2030 conditions.

As shown above, there are significant discrepancies in the number of student and employees identified in the RDEIR and used in the LRDP traffic model. The LRDP traffic model excludes 4,552 UCSB students from the traffic analysis (21,082 UCSB IRP Published Enrollment data - 16,530 LRDP Baseline). As documented in RDEIR Appendix 4.13-3 (page 5), the explanation for this adjustment was to ensure that students who reside in UCSB residence halls were not double counted in the trip generation analysis given that residence halls are subject to separate trip generation factors. As shown in Appendix 4.13-3 (Table 2, p. 5), the number of students residing in residence halls is 3,460. Based on the RDEIR documentation, the LRDP incorrectly exceeded the number of UCSB students that should be reduced by more than a thousand (4,552 – 3,460 = 1,092). The correct LRDP UCSB student baseline
adjustment assumption should yield 17,622 students versus 16,530. This error in the reduction of students is carried forward in the LRDP traffic model volumes and results in decreased trip generation to and from the project area. This in turn decreases the baseline and future traffic volumes and associated traffic impacts associated with the LRDP.

Other revisions included in the LRDP traffic model resulted in the removal of roughly half the number of current UCSB employees (from 9,500 UCSB IRP Published Employment data to 4,689 LRDP Baseline). As documented in Appendix 4.13-3 (p. 7), the explanation for this reduction was to remove part-time student employees of UCSB since these students are already on campus and therefore included in the student land use category. The part-time employees of interest are graduate students Truncating 4,843 UCSB students based on their graduate student status - assuming they are already on campus and are therefore already reflected in the student land use category is an incorrect adjustment. The LRDP traffic model should categorizes graduate students as UCSB students not UCSB employees. This LRDP traffic model adjustment is without justification as no supporting data is provided in the RDEIR that accurately stratifies/categorizes UCSB part-time employees by employment type (e.g., graduate students, food service, operations and maintenance, other etc.). Without this supporting data it is difficult to verify the accuracy and/or justify this reduction in UCSB employees for modeling purposes. Nonetheless, as stated in the RDEIR and in accordance with the UC CEQA Handbook, total students (full and part time) and total employees (full and part time) are required to be used for CEQA and the RDEIR to analyze significant effects on the environment. The changes incorporated into the LRDP traffic model based on the above assumptions result in significant reductions in trip generation and modeled traffic volumes. This in turn results in an underestimation of the future traffic impacts associated with the LRDP. Until changes to the LRDP traffic model are incorporated to reflect the actual number of students and employees as required by CEQA, the RDEIR fails to adequately identify and mitigate traffic impacts pursuant to CEQA.

Section 4.13 and Appendix 4.13-3 (LRDP UCSB Trip Generation Survey & Analysis). As part of the LRDP traffic modeling, the City’s traffic model trip generation rates for UC Santa Barbara land use categories were updated to reflect existing travel characteristics (p. 11 Appendix 4.13-3). These updates were based on a survey of three UCSB facilities: one faculty housing facility; one residence hall; and, one family student housing facility. Each facility type’s survey results were applied to all existing and future on-campus housing complexes serving faculty, staff and students respectively. This reflects a single observation of trip generation per land use category. The statistical veracity of applying trip rate estimates generated from a single observation per facility type (i.e., land use category) is questionable. The potential for sample bias is also a concern given that the single residence hall survey was conducted at Francisco Torres which is primarily a freshman/lower class residential facility. Given that freshman
students are far less likely to have access to a vehicle than older students, have smaller activity space and less likely to have part-time jobs – a survey at this facility alone would potentially introduce bias as it would generate a lower vehicle trip generation estimate relative to other UCSB residence halls that have a much larger proportion of junior and senior year students (e.g., Tropicana Gardens). Hence, a demographic survey of the student residence halls should have been conducted to help develop the trip generation studies to control for potential sampling bias. Using this single observation to justify a reduction to trip generation for all similar land use types results in across the board reductions in vehicle trips and doesn’t meet the CEQA guidelines criteria of using “reasonable worst case” assumptions in the identification and mitigation of impacts.

The 2002-2006 UCSB Transportation Survey results reported in Appendix 4.13-3 (Table 9, p. 15) does not distinguish and/or characterize faculty/staff and students travel mode distribution by time of day. Although the survey did collect information regarding arrival and departure times – this temporal data is not reflected in the model split survey results included in the RDEIR. This is an important omission given that the LRDP travel forecasting is based on the AM and PM peak hours only. All UCSB transportation survey results used to justify adjustments to the LRDP traffic model trip generation rates must be limited to the AM and PM peak hours for it to be relevant for modeling/analysis purposes.

Similarly, omission of the survey instrument in the RDEIR and Final EIR technical appendix precludes clear understanding and nexus between both the 2002 and 2006 UCSB Transportation Surveys and their application in the LRDP analysis.

Pages 4.13-64 through -68 (Trip Generation). An analysis of the UCSB LRDP model trip generation estimates for all model analysis zones with UCSB affiliated functions reveal large discrepancies from past calibrated modeling efforts performed by the City of Goleta. The LRPD 2005/06 baseline generates 2,844 PM peak hour trips less than the City’s calibrated 2005 baseline model (4,201 trips vs. 7,045 trips). The LRPD 2030 Final is projected to generate 926 and 2,182 PM peak hour trips less that the City’s 2005 Baseline and 2030 General Plan models respectively. This does not appear to be a reasonable forecast of trip generation.

<table>
<thead>
<tr>
<th>Trip Generation in UCSB Related Model Traffic Analysis Zones</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Vehicle Trip Definition</strong></td>
</tr>
<tr>
<td><strong>2005</strong></td>
</tr>
<tr>
<td>Trip Origins</td>
</tr>
<tr>
<td>Trip Destinations</td>
</tr>
<tr>
<td>Internal Trips</td>
</tr>
<tr>
<td><strong>Total Trip Production</strong></td>
</tr>
</tbody>
</table>

1. No-Project reflects UCSB baseline levels (2006-07) with all other areas reflecting 2030 conditions.
2. Total Trip Production = Trip Origins + Internal trips
Pages 4.13-64 through -68 (Trip Generation). A review of total trip generation broken out by trip type reveals a significant departure by the UCSB LRDP travel model in the percent of Home Based College (HBC) trips. The City of Goleta’s calibrated 2005 Baseline model estimates a total of 2,873 HBC trips – roughly 6 percent of total trips in the Goleta Valley. Conversely, the LRDP 2005/06 baseline generates 1,453 HBC trips – approximately 3 percent of total trips. As part of its General Plan 2030 forecast, the City forecast HBC trips to grow to 3,399 trips - remaining at approximately 6 percent of total trips. The UCSB LRDP travel model forecasts significantly less HBC trips under both the No-Project and Final LRDP alternatives: 1,719 HBC trips and 1,996 HBC trips respectively. This equates to approximately half the amount of HBC trips forecast by the City’s calibrated 2005 model baseline. The percentage share of HBC trips relative to all other trip types drops from 6% to roughly 3.5%. This represents a significant departure from the calibrated model baseline. These assumed reductions in HBC trips result in reductions in the amount and level of traffic impacts identified in the RDEIR. The traffic model memorandum released on June 16, 2008 identify three campus locations that were used in determining the reduced trip generations rates identified above. The City doesn’t believe a survey of three locations provide enough justification to significantly reduce the trip generations rates as proposed. Underestimating the trip generation rates will result in underestimating the traffic impacts associated with the proposed projects.

<table>
<thead>
<tr>
<th>2005 City Baseline Trip Gen</th>
<th>2005 LRDP Baseline Trip Gen</th>
</tr>
</thead>
<tbody>
<tr>
<td>Trip Type</td>
<td>Total</td>
</tr>
<tr>
<td>H-W</td>
<td>1,849.03</td>
</tr>
<tr>
<td>W-H</td>
<td>10,835.33</td>
</tr>
<tr>
<td>Y-O</td>
<td>6,353.26</td>
</tr>
<tr>
<td>O-H</td>
<td>7,285.68</td>
</tr>
<tr>
<td>HBC</td>
<td>2,873.22</td>
</tr>
<tr>
<td>NHB</td>
<td>15,704.65</td>
</tr>
<tr>
<td>X-X</td>
<td>3,298.00</td>
</tr>
<tr>
<td><strong>47,849.13</strong></td>
<td><strong>1.00</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>2030 General Plan Trip Gen</th>
<th>2030 LRDP NP Trip Gen</th>
<th>2030 LRDP Final Trip Gen</th>
</tr>
</thead>
<tbody>
<tr>
<td>Trip Type</td>
<td>Inter</td>
<td>%</td>
</tr>
<tr>
<td>H-W</td>
<td>2,219.66</td>
<td>3.81%</td>
</tr>
<tr>
<td>W-H</td>
<td>12,925.25</td>
<td>22.18%</td>
</tr>
<tr>
<td>H-O</td>
<td>8,041.80</td>
<td>13.80%</td>
</tr>
<tr>
<td>O-H</td>
<td>8,822.12</td>
<td>15.14%</td>
</tr>
<tr>
<td>HBC</td>
<td>3,399.23</td>
<td>5.83%</td>
</tr>
<tr>
<td>NHB</td>
<td>18,154.75</td>
<td>31.15%</td>
</tr>
<tr>
<td>X-X</td>
<td>4,711.00</td>
<td>8.08%</td>
</tr>
<tr>
<td><strong>58,273.81</strong></td>
<td><strong>1.00</strong></td>
<td><strong>55,081.40</strong></td>
</tr>
</tbody>
</table>

The reduction in trip generation rates along with the reduction in students and employees identified in above draws into question the overall validity of the traffic impacts identified in the RDEIR. Inclusion of the above assumptions and revisions in the LRDP traffic model result in reduced future forecasted volumes and understates the potential traffic impacts associated with the LRDP.
Pages 4.13-119 through -132 and 4.13-142 through -147 (Mitigation). It only makes sense that, in addition to the cutting edge green building technology envisioned by the LRDP that UCSB commit to and advance public transit improvements well beyond the mix of impacts/mitigation under the plan. The mitigation comments provided below address Mitigation Traffic-1A and -4A and include alterations of the RDEIR-proposed mitigation and new mitigation to be included in the Final EIR.

The requirement for alternative transportation improvements under Mitigation Traffic-1A and -4A (see part 3 of the measures) are triggered after the determination that an intersection is significantly impacted. This mitigation is unacceptable. The attempt to mitigate an impact is required prior to not after the impact. Revise mitigations Traffic-1A and 4A to reflect the implementation of alternative transit improvements etc. prior to the impact triggering the threshold.

Additionally, both mitigations -1A and -4A require coordination with other jurisdictions. Revise mitigations Traffic-1A and -4A to commit University resources without reliance on other jurisdictions.

Given the significant and unavoidable future traffic impacts associated with the LRDP (Impact Traffic-1 and Impact Traffic-4), UCSB must consider additional mitigation strategies that have been proven effective at other campuses in California. One such strategy is prohibiting resident lower level students from having cars on campus. This strategy resonates strongly with the City Council. It is a widely accepted practice that would compliment the implementation of a public transit plan. Progressive steps such as this one need to be identified and analyzed in a public transit plan. This and other such alternative strategies must be considered in addition to the mitigation measures identified in the RDEIR. Expand Mitigation Traffic-1A and -4A to include expanded alternative strategies such as car prohibitions and other measures employed at UC campuses.

The RDEIR must include a UCSB-generated public transit improvement plan as an alternative and supplement to roadway capacity increases and roadway openings through residential neighborhoods. A long-term transit plan for the campus and surrounding areas is needed. As a case in point, if the proposed Mesa/Phelps roadway connection does not reduce traffic impacts below significant levels; additional improvements to the local transit system could provide substantial benefit to current and future proposed levels of UCSB students, faculty and staff, Goleta residents and the environment. The FEIR Mitigation Traffic-1A and -4A must incorporate a public transit improvement plan that identifies specific improvements to the existing public transit system that would improve the mitigation of traffic impacts associated with the LRDP.
Pages 4.13-119 through -132 and 4.13-142 through -147 (Impacts/Mitigation). As noted above, the RDEIR assumes that enrollment growth will occur in pace with the provision of housing to accommodate the additional students and employees. While this is a worthy goal, there is no stated commitment or guarantee that the planned housing will be constructed. If the enrollment increases outpace the construction of housing, the traffic impact will be greater than shown in the RDEIR. The RDEIR must be either:

a. amended to include a more conservative project alternative that accounts for the potential lag or reduction in the amount of housing constructed; or

b. revised to include a measurable and binding mitigation measure to limit future increases in students, faculty, and staff commensurate with future amounts of on-campus housing constructed.

Otherwise, population and traffic will be displaced to adjacent communities such as Goleta. The traffic impacts associated with the potential displacement due to a lag or reduction in housing are not analyzed in the RDEIR. Periodic traffic surveys to monitor increases of university-related traffic on city streets/intersections should also be required. The RDEIR must be revised to accommodate one of the above options.

Pages 4.13-119 through -132 and 4.13-142 through -147 (Impacts/Mitigation). The RDEIR provides for fair share mitigation fee payments to the City of Goleta (Mitigation-1A and -1B). While the City supports this concept, the adequacy of payment of proportionate share will depend on accuracy of the LRDP traffic model which assumes all on-campus housing. As noted in previous comments, the City asserts that the LRDP traffic model is inaccurate in this regard and is an unrealistic tool for determining proportionate share. Mitigation fees must be adjustable (i.e. pay initial plus supplemental fees) in event on-campus housing does not keep pace with increases in numbers of additional students, faculty, and staff or in event monitored traffic increases exceed the numbers on which the initial proportionate share calculations are based. The RDEIR (Mitigation 1A and -1B, for example) must be revised to clarify that mitigation fee payments shall be adjusted in the future based on the actual traffic impacts of the proposed LRDP.

Page 4.13-163 Impact Traffic-10. The RDEIR acknowledges the project would increase parking demands in Isla Vista but fail to acknowledge that similar spill over parking demand will likely impact the City of Goleta. Monitoring of parking usage in new family housing areas must be required to ensure the parking impacts are mitigated in Goleta as well as Isla Vista. The mitigation must also include a requirement to construct supplemental parking if demand exceeds supply. The RDEIR must be revised to include these measures specific to Goleta to ensure the parking impacts are properly mitigated.
Water Supply

Page 4.14-4. The first paragraph mentions that the Goleta Water District applied for a grant to rehabilitate a 7th well, San Ricardo, which, if approved, work would begin in 2008 and be completed in 2009. What is the status of that grant application and well project? If this well rehabilitation is not completed, then the available water supply may be reduced. A reduction in the available water supply would make the University’s impacts more significant than reported. Again, pursuant to CEQA, the University must report a reasonable worst case scenario, and update the impact’s significance as appropriate. It is inappropriate to rely upon a speculative resource to mitigate the project impacts.

Page 4.14-13. Siltation. This section indicates that Cachuma Operation and Maintenance Board (COMB) was going to be conducting a bathymetric study in summer 2008 to determine Cachuma’s current capacity. Was this study done and if so, why were the results not included in the DEIR? How do the results of this updated study affect the water availability assumptions made in the DEIR? If this study revealed that the capacity of Cachuma has been significantly reduced due to the level of siltation, then the LRDP’s impacts may be underestimated. Again, pursuant to CEQA, the University must report a reasonable worst case scenario and update the impact’s significance as appropriate.

Page 4.14-30 to -32. Additional explanation is needed to justify the water demand impact correlation between existing units and new units at UCSB under the proposed LRDP. For the purpose of evaluating impacts, the EIR needs to demonstrate how the characteristics of the new units will be comparable to the existing units. For the water demand analysis, the EIR should provide information on the number of bathrooms per beds and whether the ratio for new units will remain at the current ratio; information should be provided about new laundry facilities and the ratio of new washing machines to beds compared with the existing ratios; and information on landscaped open space for each new residential complex should be provided and how that percentage compares to existing residential complexes. This information is needed to demonstrate the logic and validity of using the 0.152 Acre Feet per Year (AFY) per dwelling unit factor based roughly on the water use data for various University housing projects from July 2005 to June 2006. If the design of future units with regard to occupancy and water demand factors noted above will be significantly different from the existing units, the use of this water demand factor has no merit and could in fact significantly underestimate the demand. There is no explanation of how the 0.152 AFY per dwelling unit factor was actually derived. As such, this explanation must be included.

Depending on the type of residential building to be constructed under the LRDP, water demand could vary between 0.110 AFY per unit to as much as 0.195 AFY per unit. To simply use a modified average of the existing residential unit demand may
underestimate future demand, particularly if the new residential units will mimic the units exhibiting higher water demand. The water supply analysis must address reasonable worst-case scenarios. Therefore, unless it can be definitively demonstrated that new housing units will generate a water demand which will not exceed 0.152 AFY per unit, the reasonable worst-case demand factor of 0.195 AFY per unit must also be used to evaluate impacts. According to relevant CEQA case law on the analysis of water demand, this document must also evaluate a range of scenarios.

As listed above, the Cumulative Impacts section must be updated as mentioned above, to both justify the assumptions, address a more reasonable worst-case demand scenario, and to provide a range of water demand scenarios. Water supply is a critical issue for our region and it is essential to accurately predict demand to the absolute best of your ability and to assess the supply considering all future pressures and restrictions.

Page 4.14-31. UCSB’s water demand predictions may underestimate demand in that they are based solely on residential units and total non-residential square footage (per 1,000 square feet based on the average demand of classrooms, labs and other combined facilities). This does not account for new landscaping or open space being proposed which could increase the water demand and associated impacts considerably. As such, the water demand for these other “uses” must be provided and included within the analysis.

Page 4.14-31. Use of an “average” to determine water demand of non-residential building space may significantly underestimate the impact to the available water supply. For example, if the square footage of lab space proposed is disproportionate to the square footage of classroom space proposed and the two uses have significant differences in water demand, use of averaging could significantly underestimate demand. Averages should not be used, but rather the water demand for each building space classification must be quantified separately and then the total demand of the aggregate provided. Re-evaluate impacts based on the demands of the individual uses.

Page 4.14-34. Impact W-3 finds that the cumulative demand of development associated with the LRDP in conjunction with additional development within the service area of GWD may increase demand beyond available supply and therefore the impact is significant. Table 4.14-11 on Page 4.14-36 appears to indicate that the demand analysis includes only the City of Goleta and Isla Vista Master Plan. If the other unincorporated areas served by the GWD are not included in the demand analysis, then the results are misleading and the conclusion that water supply will be greater than demand may be incorrect. The analysis must include all potential future development within the boundaries of the GWD, not just the demand within the City and Isla Vista.
Additionally, the subsequent mitigation discussion does not satisfy the requirements for CEQA analysis and disclosure per *Vineyard Area Citizens for Responsible Government v. City of Rancho Cordova*, 40 Cal. 4th 412 (2007). As a result, mitigation measure W-3G is unlawful. The University must update the discussion for compliance with State statutes.

Page 4.14-36. To prevent the University from acquiring all available water in any given year based on the GWD’s first come, first serve policy and the 1% annual cap mandated by the SAFE Ordinance, there should be a mitigation restricting UCSB to a maximum annual new service water supply based on a percentage of the available 1%. Without an annual cap applied to UCSB, new service requests related to implementation of the LRDP could capture the entire amount available in a given year, which would eliminate all other development in that year. This would result in significant impacts related to the City of Goleta’s ability to meet its affordable housing or RHNA requirements and would exacerbate the disparity in the jobs-housing balance by preventing any development to occur outside the University. Such an imbalance will translate into additional impacts on transportation . . . that are not identified, quantified or analyzed in the RDEIR. An example of mitigation might be “UCSB’s applications for new water service may not exceed 30% of the annual water allocation available for new service connections.”

Appendix 4.14-1 Water Supply Assessment. The introduction states that the proposed LRDP update meets many of the definitions of a “project” as set forth in §10912 of the California Water Code (CWC), and that the “Water Supply Assessment” (WSA) was prepared in accordance with the requirements of §10910 of the CWC. However, it appears that the WSA was not prepared by the “Public Water System” but by UCSB staff. Given the significant impacts to the entire region posed by the proposed project, an updated water supply assessment must legally be prepared by, or in consultation with and approved by, the “Public Water System.”

**Wastewater**

Page 4.15-1. The first bulleted item in the introduction states...*This revised section estimates future wastewater flows using the 2007 Goleta West Sanitary District (GWSD) Wastewater Master Plan.* City objects because of the inability of the general public to adequately review this revised section, as the above referenced plan is not readily available. City staff conducted an exhaustive search to view the document, but the 2007 GWSD Master Plan was not available on the GWSD website, or the Goleta Valley Public Library, or the UCSB Library. The City was only able to acquire a copy of the document after repeated requests to the GWSD and considerable expense. This issue could be the subject of a potential re-circulation. As such, the University must immediately make this document available on its website for public review.
Page 4.15-9. Impact WW-1. This impact correctly documents that the University's growth will add considerable wastewater flow volumes resulting in significant impacts. Mitigation is proposed to request that the permit for the treatment plant be re-issued to address the proposed LRDP growth (WW-1A). Another mitigation (WW-1B) identifies that the University will negotiate the acquisition of additional design capacity in the treatment plant to accommodate the proposed average annual growth. The residual significance is "significant and unavoidable".

The level of impact can be reduced to less than significant with more sincere mitigation that is reasonable, realistic, and responsible. As a suggestion, the mitigation could be re-crafted such that the University must implement a binding, and enforceable mitigation measure to freeze, or reduce enrollment increases, in the event that expansion of treatment plant is delayed, or the treatment plant's capacity to accommodate the resulting increase in effluent is compromised.

Page 4.15-10. Tables 4.15-2, -3, and -4 rely upon averages for both residential and institutional uses. Use of an "average" to determine wastewater generation may significantly underestimate residential and non-residential impacts to the available wastewater collection systems.

Residential Example: the University is proposing construction of a variety of housing types to facilitate expansion on campus. Single students residing in residence halls will generate far less wastewater than a family living in a single family dwelling. Each residential unit classification should be quantified separately and then the total demand of the aggregate provided. Wastewater Impacts should be re-evaluated based on the demands of the individual residential unit types.

Institutional Example: The LRDP proposes approximately 1,798,000 square feet of new institutional space broken down into the following classifications:

- Instruction an Research
- Organized Research Units
- Library
- Public Services
- Academic Support
- Student Services
- Institutional Services

Facilities which are utilized by a high percentage of the student population, such as the library, generate significantly more wastewater than research areas which may require greater square footage but serve a proportionately smaller number of students, staff, and faculty. As such, averages should not be used, but rather the wastewater generation for each institutional building space classification must be quantified
separately and the total wastewater generation of the aggregate provided. Therefore, wastewater impacts must be re-evaluated based on the demands of the individual building uses.

Page 4.15-11. The first bulleted item is in error and must be updated, The City of Goleta’s General Plan was adopted in 2006 (not 2007).
Memorandum

ATTACHMENT B

To: Steve Wagner
cc: Jim Biega
From: Jim Damkowitz, Principal
Reference #: P08064
Subject: UCSB Long Range Development Plan Traffic Analysis Comments

This memorandum identifies outstanding issues/concerns identified by Dowling Associates regarding the re-circulated UCSB Long Range Development Plan DEIR travel forecasts and documentation.

Comments are grouped based on the following four general analysis topics.

1) LRDP Model Baseline UCSB – City Screenline Comparisons  
2) LRDP Model Land Use Assumptions for UCSB  
3) LRDP UCSB Trip Generation Survey & Analysis  
4) LRDP Travel Forecasts on Selected Roadways

The re-circulated UCSB LRDP DEIR does do a better job at documenting the holistic model validation results and providing explanations for certain analysis assumptions that were questioned by the City of Goleta during its initial review of the draft DEIR. However as described herein, several issues still appear to require additional clarification/correction.
1) LRDP Model Baseline UCSB – City Screenline Comparisons

To isolate model performance as it relates to the interface between UCSB and the City of Goleta, two UCSB-Goleta screenlines were developed (See Figure 1). Comparisons between model baseline counts performed by the City in 2003-05 and the City and LRDP baseline model results are shown below. Based on these screenline comparisons, the LRDP model baseline shows 247 less PM peak hour UCSB Main Campus trips and 1,081 less PM peak hour UCSB trips interfacing (as either origins or destinations) with the City of Goleta relative to actual counts.

**UCSB Main Campus**

- 2003-05 Traffic Counts = 3,722 PM Peak Hour Trips
- City 2005 Model Baseline = 3,501 PM Peak Hour Trips
- LRDP Model Baseline = 3,475 PM Peak Hour Trips

**UCSB & Isla Vista**

- 2003-05 Traffic Counts = 6,314 PM Peak Hour Trips
- City 2005 Model Baseline = 5,536 PM Peak Hour Trips
- LRDP Model Baseline = 5,233 PM Peak Hour Trips

Given that the LRDP data collection effort conducted in 2006 did not select representative segment locations consistent with this UCSB-City screenline, a direct comparison with UCSB’s traffic counts is not possible. It should be noted that during City’s baseline model traffic data collection, gas prices were generally lower than during the time of the LRDP data collection effort. Lower traffic counts would then be expected. However, as seen in Figure 2, gas prices are now more similar to the 2003-05 timeframe which further reinforces the validity of the City Model traffic counts as a basis for comparison of model performance.

**Figure 2. Historical Fuel Price Comparison**
Figure 1. Baseline Screenline Comparisons
2) LRDP Model Land Use Assumptions for UCSB

The data presented in Section 4.10 Population and Housing of the DEIR cites the following UC-Affiliated Populations information for the 2006-07 academic year at UCSB:

- 21,082 Total Students (total enrollment irrespective of full or part time status)
- 20,556 Full Time Equivalent (students enrolled for at least three quarters)
- 9,500 Faculty and Staff (includes full and part time employees)
- 6,000 Faculty and Staff Full Time Equivalent

The source of this information is the annual Campus Profiles prepared by the Office of Institutional Research and Planning at UCSB. As stated in the DEIR and in accordance with the UC CEQA Handbook, total students (full and part time) and total employees (full and part time) are used for CEQA and the DEIR to analyze significant effects on the environment.

Table 1 compares the UCSB LRDP model land use inputs relative to the City’s calibrated model and published UCSB data. Significant land use discrepancies between the modeling performed for the LRDP DEIR and the City’s 2005 baseline.

Table 1. UCSB Student and Employee Comparisons

<table>
<thead>
<tr>
<th>Land Use Parameter</th>
<th>UCSB IRP 2006-07</th>
<th>City Calibrated Model Baseline 2005</th>
<th>LRDP Baseline 2005-06</th>
<th>City Model General Plan 2030</th>
<th>LRDP No-Project 2030</th>
<th>LRDP Final 2030</th>
</tr>
</thead>
<tbody>
<tr>
<td>UCSB Students</td>
<td>21,082</td>
<td>19,093</td>
<td>16,530</td>
<td>25,000</td>
<td>16,530</td>
<td>18,046</td>
</tr>
<tr>
<td>UCSB Employees</td>
<td>9,500</td>
<td>9,529</td>
<td>4,689</td>
<td>11,400</td>
<td>4,885</td>
<td>6,385</td>
</tr>
</tbody>
</table>

1UCSB reflects baseline levels (2006-07) with all other areas reflecting 2030 conditions.
2Reflects all housing dwelling units (SFDU, MFDU, Student Housing, Student Family Housing, Faculty Housing).
3n/a: Institutional Research and Planning only tracks University owned student and faculty housing.
4Inputs reflects all model analysis zones (TAZ’s) related to UCSB functions – including Isla Vista

As shown in Table 1, the LRDP EIR traffic modeling removes 4,552 UCSB students from the traffic analysis (21,082 UCSB IRP Published Enrollment data - 16,530 LRDP Baseline). As documented in DEIR Appendix 4.13-3 (page 5), the explanation for this adjustment was to ensure that students who reside in UCSB residence halls were not double counted in the trip generation analysis given that residence halls are subject to separate trip generation factors. As shown in Appendix 4.13-3 (Table 2, p. 5), the number of students residing in residence halls is 3,460. Based on the DEIR documentation, the LRDP incorrectly exceeded the number of UCSB students that should be reduced by more than a thousand (4,552 - 3,460 = 1,092). The correct LRDP UCSB student baseline adjustment assumption should yield 17,622 students versus 16,530. This ~1,100 student underestimation error is carried forward in all the LRDP future year traffic forecasts.

The LRDP traffic analysis also removed roughly half the number of UCSB employees (from 9,500 UCSB IRP Published Employment data to 4,689 LRDP Baseline) from the traffic analysis. As documented in Appendix 4.13-3 (p. 7), the explanation for this reduction was to remove part-time student employees of UCSB since these students are already on campus and therefore included in the student land use category. The part-time employees of interest are graduate students (personal communication Sarah Brandenberg, Fehr & Peers). Truncating 4,843 UCSB students based on their graduate student status - assuming they are already on campus and are therefore already reflected in the student land use category is an incorrect adjustment. The City’s model categorizes graduate students as UCSB students – not UCSB employees.
Therefore this LRDP adjustment is without justification. Also, no supporting data is provided in the DEIR that accurately stratifies/categorizes UCSB part-time employees by employment type (e.g., graduate students, food service, operations and maintenance, other etc.). Without this supporting data it is difficult to verify the accuracy and/or justify this reduction in UCSB employees for modeling purposes. Nonetheless, as stated in the DEIR and in accordance with the UC CEQA Handbook, total students (full and part time) and total employees (full and part time) are required to be used for CEQA and the DEIR to analyze significant effects on the environment.

3) LRDP UCSB Trip Generation Survey & Analysis

As part of the LRDP traffic modeling, the City’s traffic model trip generation rates for UC Santa Barbara land use categories were updated to reflect existing travel characteristics (p. 11 Appendix 4.13-3). These updates were based on a survey of three UCSB facilities: one faculty housing facility; one residence hall; and, one family student housing facility. Each facility type’s survey results were applied to all existing and future on-campus housing complexes serving faculty, staff and students respectively. This reflects a single observation per land use category. The statistical veracity of applying trip rate estimates generated from a single observation per facility type (i.e., land use category) is questionable. The potential for sample bias is also a concern given that the single residence hall survey was conducted at a primarily freshman dominated facility (Francisco Torres). Given that student freshman are far less likely to have access to a vehicle than older students, have smaller activity space and less likely to have part-time jobs – a survey at this facility alone would potentially introduce bias as it would generate the lowest vehicle trip generation estimates relative to other UCSB residence halls that have a much larger proportion of sophomore, junior and senior year students (e.g., Tropicana Gardens). Hence, a demographic survey of the student residence halls should have been conducted to help develop the trip generation studies to control for potential sampling bias.

Similarly, the 2002-2006 UCSB Transportation Survey results reported in Appendix 4.13-3 (Table 9, p. 15) does not distinguish/characterize faculty/staff and students travel mode distribution by time of day. Although the survey did collect information regarding arrival and departure times – this temporal data is not reflected in the model split survey results. This is an important omission given that the LRDP travel forecasting is based on the AM and PM peak hours only. All UCSB transportation survey results must be specific to these analysis hours if the information reported is to be considered relevant for modeling purposes. The survey instrument used for both the 2002 and 2006 UCSB Transportation Surveys should be included in the technical appendix for review.

It should be noted that the City’s model developed its HBC trip generation rates in a very similar fashion to the LRDP - by conducting campus cordon counts, controlling for campus cut-through traffic, license plate surveys and measured trip generation studies at specific campus housing facilities (surveys were conducted in mid-90’s by Associated Transportation Engineers for the County of Santa Barbara). The City model did not rely on ITE trip rates. For comparative purposes, the LRDP traffic analysis compares its measured trip rates with ITE trip rates (Appendix 4.13-3). No comparison was made to document the differences between the LRDP trip generation rates with those developed for the City’s traffic model. These are shown in Table 2. Summing across all UCSB affiliated land use categories, the LRDP trip generation rates are roughly half to those in the calibrated City model. Such a significant difference would not be expected even despite the span of time between surveys (2008 – mid 90’s).
direction of change (lower trip rates) is also suspect given the greater auto ownership of today’s students than in during the 1990’s (unsubstantiated consultant observation).

### Table 2. City vs. LRDP Trip Generation Estimates

<table>
<thead>
<tr>
<th>Land Use</th>
<th>City Model Productions</th>
<th>Attraction</th>
<th>UCSB Model Productions</th>
<th>Attraction</th>
</tr>
</thead>
<tbody>
<tr>
<td>Home-College</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>UCSB</td>
<td>0.0275</td>
<td>0.0129</td>
<td>0.0152</td>
<td>0</td>
</tr>
<tr>
<td>STUD_HSE</td>
<td>0.1176</td>
<td>0.3856</td>
<td>0</td>
<td>0.0456</td>
</tr>
<tr>
<td>STUDENT_HD</td>
<td>0.1176</td>
<td>0.3856</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>FACULTY_ST</td>
<td>0.1176</td>
<td>0.3856</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>FACULTY_FAM_HSE</td>
<td>0.0539</td>
<td>0.1302</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>FACULTY_HSE</td>
<td>0</td>
<td>0.1175</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>SUM</td>
<td>0.3783</td>
<td>0.4367</td>
<td>0.1524</td>
<td>0.2597</td>
</tr>
</tbody>
</table>

| Home-Work    |                        |            |                        |            |
| UCSB         | 0                      | 0.0044     | 0                      | 0.0023     |
| STUD_HSE     | 0.0336                 | 0.0046     | 0.0152                 | 0          |
| STUDENT_HD   | 0.0336                 | 0.0046     | 0                      | 0          |
| FACULTY_ST   | 0                      | 0.0451     | 0                      | 0.038      |
| FACULTY_FAM_HSE | 0.0368        | 0          | 0.0329                 | 0          |
| FACULTY_HSE  |                        |            |                        |            |
| SUM          | 0.0672                 | 0.0381     | 0.0849                 | 0.0405     |
| HBC+HBW Sum  | 0.4455                 | 0.465      | 0.2873                 | 0.3002     |

Changes to trip rates combined with use of incorrect estimates of UCSB employees result in significantly less UCSB affiliated trip production estimates than the City’s calibrated model – specifically for the HBC trip purpose. A review to total trip generation broken out by trip type reveals a significant departure by the UCSB LRDP travel model in the percent of Home Based College (HBC) trips (Table 3). The City of Goleta’s calibrated 2005 Baseline model estimates a total of 2,873 HBC trips – roughly 6 percent of total trips in the Goleta Valley. Conversely, the LRDP 2005/06 baseline generates 1,453 HBC trips – approximately 3 percent of total trips. As part of its General Plan 2030 forecast, the City forecast HBC trips to grow to 3,399 trips – remaining at approximately 6 percent of total trips. The UCSB LRDP travel model forecasts significantly less HBC trips under both the No-Project and Final LRDP alternatives; 1,719 HBC trips and 1,996 HBC trips respectively. This equates to approximately half the amount of HBC trips forecast by the City’s calibrated 2005 model baseline. The percentage share of HBC trips relative to all other trip types drops from 6% to roughly 3.5%. This represents a significant departure from the calibrated model baseline.

As stated in Appendix 4.13-3 (p. 23, last bullet), the explanation for this inconsistency is the greater refinement of TAZs implemented in the LRDP model – resulting in less intra-zonal trips which by definition do not produce vehicle trips on the model network. This explanation is incorrect and misleading. It implies that trip generation is affected or influenced by traffic analysis zone size which untrue. Trip generation is completely independent of zone size. If a large TAZ is split into smaller zones (as was done for the main campus area in the model) – there will be a decrease in intra-zonal trips but a commensurate increase in inter-zonal trips given the smaller zone sizes. The LRDP does not adequately explain why splitting the UCSB TAZ into 19 zones results in 1,420 HBC vehicle trips to disappear from the model (see City Baseline vs. LRDP Baseline).
Table 3. Trip Generation by Trip Type Comparison

<table>
<thead>
<tr>
<th>Trip Type</th>
<th>2005 City Baseline Trip Gen</th>
<th>2005 LRDP Baseline Trip Gen</th>
<th>2010 LRDP NP Trip Gen</th>
<th>2010 LRDP Final Trip Gen</th>
</tr>
</thead>
<tbody>
<tr>
<td>H-W</td>
<td>1,846.03</td>
<td>1,603.31</td>
<td>H-W</td>
<td>2,248.44</td>
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<tr>
<td>W-H</td>
<td>10,835.39</td>
<td>10,310.00</td>
<td>W-H</td>
<td>12,455.52</td>
</tr>
<tr>
<td>C-O</td>
<td>6,532.26</td>
<td>6,653.35</td>
<td>C-O</td>
<td>8,424.87</td>
</tr>
<tr>
<td>O-H</td>
<td>7,256.65</td>
<td>7,106.98</td>
<td>O-H</td>
<td>9,037.86</td>
</tr>
<tr>
<td>HBC</td>
<td>2,873.22</td>
<td>1,452.69</td>
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<tr>
<td>NHB</td>
<td>15,104.65</td>
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<td>NHB</td>
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<tr>
<td>X-X</td>
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<td>4,711.00</td>
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<tr>
<td></td>
<td>47,848.13</td>
<td>44,942.27</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

4) LRDP Travel Forecasts on Selected Roadways

Comparison of LRDP forecasted PM peak hour 2030 roadway volumes to forecasted City General Plan 2030 roadway volumes are shown in the table below. Comparing the LRDP No-Project relative to the City's General Plan analysis, significant PM peak hour volume differences result at key locations within the City. Of most concern, the No Project analysis projects approximately 120-250 more peak hour trips northbound on Storke/Glen Annie. Under the LRDP Final Alternative, forecast PM peak hour trips exceeds the City's General Plan forecasts (GP-1 Forecast – does not reflect regional roadway improvements) – indicating significant impacts at several key locations. Conversely, under the LRDP Final Mitigated Alternative, forecast PM peak hour trips shows significantly less PM peak hour traffic than the City's General Plan (GP-7 Forecast – reflects regional roadway improvements) forecasts. These PM peak hour volume reductions are significant and suggest that the modifications made to the City's model as described above result in significantly less forecasted traffic on key City facilities. Without any information and/or documentation on the LRDP traffic model it appears that the DEIR may be understating the traffic impacts associated with the proposed project.
### Table 4. Segment Volume Comparisons of Key City Roadways

<table>
<thead>
<tr>
<th>Roadway Segment</th>
<th>LRDP No-Project vs. City GP-1 Forecast</th>
<th>LRDP Final vs. City GP-1 Forecast</th>
<th>LRDP Mitigated vs. City GP-7 Forecast</th>
</tr>
</thead>
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Letter R-8
City of Goleta

3/30/2009

A: These introductory comments are elaborated in Attachment A; therefore, please refer to the following responses to the comments in Attachment A.

Introduction and Summary

Response to Comment R-8-1. As explained in responses to comments R-8-21 through R-8-30, below, the assumption in the traffic model discussed in the RDEIR, and therefore its emissions projections, are supported by substantial evidence.

Response to Comment R-8-2. Please see responses to comments R-8-21 through R-8-30, below.

Response to Comment R-8-3. Please see responses to comments R-8-31 through R-8-38, below.

Response to Comment R-8-4. Please see responses to comments R-8-39 through R-8-42, below.

Response to Comment R-8-5. Comment noted.

Air Quality

Response to Comment R-8-6. Please see response to comment R-8-1, above.

Response to Comment R-8-7. LRDP Mitigation AIR-1B (RDEIR, p. 4.2-24) will be revised as follows:

LRDP Mitigation AIR-1B: Area Sources. The LRDP shall support the full and timely implementation of UC Santa Barbara’s Sustainability Plan and the green building policy for higher energy efficiency to ensure that design and construction features which reduce natural gas dependence are incorporated into all new buildings.

Response to Comment R-8-8. The RDEIR provides an inventory of projected greenhouse gas emissions attributable to development under the LRDP, and determines that these emissions will not make a cumulatively considerable contribution to overall climate impacts. (See also RDEIR, pp. 4.2-43 through -63). Regarding the standard of significance, please see response to comment R-26-AQ-2b.

Population and Housing

Response to Comment R-8-9. The LRDP growth summary (Table 4.10-21) focuses on the physical characteristics of the plan; it uses bedspaces and units to identify family housing components. As stated on page 4.10-29, “The LRDP also plans for the addition of 300 additional faculty and 1,400 additional staff over the plan’s lifetime. The LRDP states that 1,874 additional faculty and staff housing units will be provided at buildout. This amount is sufficient to accommodate all additional employees anticipated under the LRDP, including their spouses and children.” Impact POP-1 does not explicitly discuss the increase in population from the families of students, faculty, and staff, since that population would be accommodated by the units provided. For other factors, please see Section 4.10.2.2.
Response to Comment R-8-10. The DEIR and RDEIR incorporated the latest data available at the time of the Notice of Preparation, in accordance with the requirements of CEQA Guidelines section 15126.2(a).

Response to Comment R-8-11. The statement on RDEIR page 4.10-9 does not imply that Goleta’s growth rate is higher than 2.5 percent, or that it equals 2.5 percent. As stated: “Between the years 2007 and 2008, many of the cities in the County saw a growth of between 1.0 and 2.5 percent (including the City of Goleta) [emphasis added].” The LRDP EIR determines the share of cumulative impacts attributable to growth under the LRDP; it does not individually consider the particular contributions of other individual jurisdictions.

Response to Comment R-8-12. South Coast statistics are used throughout RDEIR Section 4.10.1.1, as well as Goleta and Isla Vista-specific data. Please see response to comment A-8-7 for clarification of South Coast statistics in the tables in this EIR section.

Response to Comment R-8-13. Please see response to comment R-8-10. The RDEIR’s analysis of housing impacts used the countywide vacancy rate because University-affiliated residents live throughout the County.

Response to Comment R-8-14. Housing growth data for Goleta is included in Tables 4.10-17 and 4.10-18.

Response to Comment R-8-15. The DEIR and RDEIR incorporated the latest data available at the time of the Notice of Preparation, in accordance with the requirements of CEQA.

Response to Comment R-8-16. The requested information may be calculated from the data provided in RDEIR Table 4.10-21.

Response to Comment R-8-17. The LRDP proposes to house the net growth of student enrollment. As stated in subsection 4.10.2.2 (RDEIR, p. 4.10-26), the proposed housing composition is designed to be flexible so that it can meet the demands of incoming student characteristics. The provision of 239 net new student family units (for a total of 943) is based on the estimated demand for such housing.

Regardless of the composition of new students, the LRDP would allow the University to build up to a maximum facility capacity of 5,000 additional students. A portion of those students (239) would be accommodated by family student units, for a total of 943 family student units provided on campus.

Response to Comment R-8-18. The text will be revised as follows:

The LRDP also plans for the addition of 300 additional faculty and 1,400 additional staff over the plan’s lifetime.

Response to Comment R-8-19. Please see Master Response – Housing and Population.

Response to Comment R-8-20. The text will be changes as follows:

As set forth in Mitigation POP-22A, the campus will monitor its progress towards provision of housing for faculty and staff.

Transportation

Response to Comment R-8-21. RDEIR Appendix 4.13-3 contains the documentation of the model used for the LRDP transportation impact analysis. The results presented below provide further justification as to
the adequacy of the LRDP traffic model. As stated in the model development report, the LRDP model meets applicable calibration and validation requirements:

- **Static Model Validation** – The LRDP traffic model was validated to the same criteria as the City’s model and the results show that the LRDP model meets validation standards.

- **Screenline Validation** – The LRDP traffic model was validated to the nine screenlines established by the City and the results indicate that the LRDP and City model produce nearly identical results at seven out of nine screenline locations and two of the screenlines (Screenlines 8 and 9), which appear to be the most influenced by UC Santa Barbara trips, have a lower percent deviation with the LRDP model than with the City’s model.

- **Traffic Volumes at Campus Gateways** – Existing (2006) traffic volumes at the UC Santa Barbara campus gateways were compared to the City and LRDP model forecasts and the results show that the City’s model produces lower traffic forecasts at the UC Santa Barbara gateways than the LRDP model and the LRDP model’s distribution more closely resembles the distribution from the 2006 counts.

- **UC Santa Barbara Main Campus Trips** – Only trips produced by the main campus were plotted on the model roadway network and the results show that the LRDP traffic model volumes closely resemble the traffic volumes from the 2005 City model but are generally higher around the main campus.

- **Vehicle-Trip Generation** - The number of vehicle-trips generated by the City’s 2005 model was compared to the trip generation of the LRDP model for UC Santa Barbara land uses and other land uses in the immediate vicinity of the campus. The City’s model contains more internal trips and intrazonal trips than the LRDP model, which is expected due to the TAZ refinement implemented in the LRDP model. In addition, intrazonal trips (by definition) do not produce vehicle-trips on the roadway network and do not affect the model forecasts. The LRDP model also contains a higher number of home-base college trip origins and fewer home-base college internal and intrazonal trips.

**Response to Comment R-8-22.** Traffic impacts and mitigation measures have been identified for roadways of concern noted in the City’s comment letter, as shown in RDEIR Table 4.13-39 and summarized as follows: Intersection Impacts of Hollister/Storke, Phelps/Storke, US 101 NB Ramps/Calle Real/Storke, US 101 SB Ramps/Storke, US 101 SB Ramps/Los Carneros, Hollister/Los Carneros, US 101 NB Ramps/Fairview, US 101 SB Ramps/Fairview, Hollister/Fairview, Fairview/Calle; Roadway Impacts of Storke Road and Los Carneros Road. The LRDP TDF (Travel Demand Forecast) model projects traffic volume (or “travel demand”) increases at these facilities, and traffic impacts have been identified based on the City’s significance criteria.

**Response to Comment R-8-23.** Appendix 4.13-3 contains the documentation of the model development for the LRDP transportation impact analysis. As stated in the model development report, the UC Santa Barbara population and housing data was modified from the original City of Goleta model as follows.

- **UCSB Students** - 19,039 students in original model and 16,530 students in LRDP model – the reduction in students is due to the reclassification of students residing in residence halls on the main campus to “on-campus” resident students

- **UCSB Faculty/Staff** - 9,528 employees in original model and 4,685 employees in LRDP model – the LRDP model removed part-time student employees from the faculty/staff count contained in the original model since these students are already on campus and included in the student land use category (EIR footnote: Table 3.0-5 of the UC Santa Barbara Draft EIR and the corresponding discussion on Page 3.0-13 explains the faculty and staff population data applied to the LRDP impact analysis. To avoid double counting the impact of students already on campus who happen to have an on-campus job, the 4,685 employee count was used as the baseline for looking at impacts)
- Housing - 1,916 housing units on main campus and 1,789 units on Storke Campus in original model were revised as follows:
  - 3,470 on-campus student beds (main campus Residence Halls)
  - 1,325 student beds on Storke Campus (Francisco Torres Residence Hall)
  - 904 student beds on Storke Campus (University Owned Apartments)
  - 592 family housing units on Storke Campus (University Owned Apartments)
  - 65 faculty/staff housing units on West Campus

**Response to Comment R-8-24.** RDEIR Appendix 4.13-3 (pages 11-17) contains the documentation of the trip generation for the LRDP. As stated, the trip generation was based on a combination of traffic count data at existing University uses and travel survey data, and was validated to existing conditions as follows:

The trip generation rates based on travel survey data for students and faculty/staff were adjusted (increased) so that the trip generation of existing uses matched actual traffic counts at the campus gateways. Increasing the trip generation rates was necessary to account for visitor trips to/from campus (visitors are included in the trip generation rates for faculty/staff). In addition, although many students and faculty/staff typically commute to campus in a mode other than a SOV, they may occasionally drive to campus, which was not reflected in the travel survey results. The final trip generation rates applied to the LRDP traffic study produced existing forecasts that matched existing traffic counts on campus.

**Response to Comment R-8-25.** RDEIR Appendix 4.13-3 provides data showing that the model trip generation matches existing conditions on campus. As stated in the model development report:

Table 23 shows the PM peak hour traffic volumes collected in 2006 at the UC Santa Barbara campus gateways along with the forecasted traffic volumes from the 2005 City traffic model and LRDP traffic model. As shown, the City model produces lower traffic forecasts at the UC Santa Barbara gateways than the LRDP model and the LRDP model's distribution more closely resembles the distribution from the 2006 counts.

Traffic Volumes at Campus Gateways – Existing (2006) traffic volumes at the UC Santa Barbara campus gateways were compared to the City and LRDP model forecasts and the results show that the City’s model produces lower traffic forecasts at the UC Santa Barbara gateways than the LRDP model and the LRDP model’s distribution more closely resembles the distribution from the 2006 counts.

UC Santa Barbara Main Campus Trips – Only trips produced by the main campus were plotted on the model roadway network and the results show that the LRDP traffic model volumes closely resemble the traffic volumes from the 2005 City model but are generally higher around the main campus.

Vehicle-Trip Generation - The number of vehicle-trips generated by the City’s 2005 model was compared to the trip generation of the LRDP model for UC Santa Barbara land uses and other land uses in the immediate vicinity of the campus. The City’s model contains more internal trips and intrazonal trips than the LRDP model, which is expected due to the TAZ refinement implemented in the LRDP model. In addition, intrazonal trips (by definition) do not produce vehicle-trips on the roadway network and do not affect the model forecasts. The LRDP model also contains a higher number of home-base college trip origins and fewer home-base college internal and intrazonal trips.

**Response to Comment R-8-26.** RDEIR Appendix 4.13-3 provides data on home-based-college (HBC) trips. As stated in the model development report:
The number of vehicle-trips generated by the City’s 2005 model was compared to the trip generation of the LRDP model for UC Santa Barbara land uses and other land uses in the immediate vicinity of the campus. Table 25 presents the City’s 2005 model (TAZs 16, 17, 31-35, and 162) and LRDP (TAZs 16, 17, 31-35, 162, and 350-370) trip generation results. As shown, the City’s model contains more internal trips and intrazonal trips than the LRDP model. The reduction in intrazonal trips is expected due to the TAZ refinement implemented in the LRDP model. In addition, intrazonal trips (by definition) do not produce vehicle-trips on the roadway network and do not affect the model forecasts.

The reduction in internal trips is due to the recategorization of UC Santa Barbara housing uses. For example, the City’s model had a higher percentage of UC Santa Barbara housing trips traveling to/from campus (defined as home-based college (HBC) trips). Based on travel surveys, most students residing in close proximity to the campus and in UC Santa Barbara housing travel by bicycling or walking and do not drive to campus (90% of students bike, walk, or take transit to campus as shown in Table 4.13-23 in the Draft LRDP EIR). Therefore, the trip characteristics of UC Santa Barbara housing uses were adjusted to show a larger percentage of home-based-other trips than HBC trips to reflect students driving to work or shop off campus. Table 26 presents a comparison of HBC trips from the City’s model and the LRDP model. As shown, the LRDP model contains a higher number of HBC trip origins and fewer HBC internal and intrazonal trips.

Traffic Volumes at Campus Gateways – Existing (2006) traffic volumes at the UC Santa Barbara campus gateways were compared to the City and LRDP model forecasts and the results show that the City’s model produces lower traffic forecasts at the UC Santa Barbara gateways than the LRDP model and the LRDP model’s distribution more closely resembles the distribution from the 2006 counts.

UC Santa Barbara Main Campus Trips – Only trips produced by the main campus were plotted on the model roadway network and the results show that the LRDP traffic model volumes closely resemble the traffic volumes from the 2005 City model but are generally higher around the main campus.

Response to Comment R-8-27. As explained in RDEIR Impact TRAFFIC-8, Mitigation TRAFFIC-8A requires the University to work with MTD and local agencies to improve transit service. The University is committed to working with agencies and local jurisdictions to ensure a complete and comprehensive impact study is conducted for the LRDP. Reductions in driving trips achieved through transit improvements will be quantified through mitigation monitoring as outlined under Mitigation TRAFFIC-1A(2). The University will quantify traffic volume changes through the collection of actual traffic counts at campus gateways and nearby intersections. The effectiveness of transit improvements can be measured through changes in vehicle volumes on campus roadways.

Comments regarding LRDP policies, such as prohibiting vehicles for freshman, are noted; please see response to comment I-26-8B.

Response to Comment R-8-28. The LRDP is proposing to construct housing for all new students, faculty, and staff. Therefore, quantitative analysis of the no-housing scenario is not required for the approval of the LRDP. As part of the recirculation of EIR Section 4.13 Transportation and Circulation, the University updated the transportation study to include a Delayed Housing Scenario. The University is committed to working with agencies and local jurisdictions to ensure a complete and comprehensive impact study is conducted for the LRDP. Therefore, several sections of the Draft EIR were revised and released for public review and input as part of the Recirculated Draft EIR. The Delayed Housing Scenario is presented in RDEIR Section 4.13, pages 4.13-76 to -77. Please see response to comments A-10-1 and A-12-1.

The monitoring program that is part of RDEIR Mitigation Measure TRAFFIC-1A(2) is one of several proposed mitigation measures. Increases in traffic volumes on City roadways will be determined through monitoring, and the University will quantify traffic volume changes through the collection of actual traffic
counts at campus gateways and nearby intersections. The monitoring program will be used to identify the appropriate timing for the implementation of required mitigation measures.

**Response to Comment R-8-29.** RDEIR Section 4.13 Transportation and Circulation contains a discussion regarding proportional share of off-campus roadway improvements (RDEIR, p. 4.13-117), which acknowledges the need to monitor traffic conditions to account for changes in University travel characteristics or modeling assumptions as follows:

*To account for changes in traffic patterns, variances in traffic modeling, and other unforeseen circumstances a monitoring program will include at least annual updates of traffic counts and a comprehensive five-year reassessment including new model runs and verification.*

**Response to Comment R-8-30.** Parking for new University Housing is being provided as part of the LRDP. The University has historically monitored parking conditions for campus parking lots to ensure adequate parking is provided. Unlike Isla Vista, which is directly across from the main academic campus, there is unlikely to be spillover parking in Goleta because [HWY?].

**Water Supply**

**Response to Comment R-8-31:** The RDEIR uses the information available at the time it was prepared. The San Ricardo well rehabilitation is a part of the Goleta Water District’s Capital Improvement Program. The RDEIR reasonably assumes that GWD will implement this program as necessary to meet future demands.

**Response to Comment R-8-32:** Please see Master Response - Water Supply, section IV.A.

**Response to Comment R-8-33:** Please see Master Response - Water Supply, section V.B.

**Response to Comment R-8-34:** The water demand factors used to estimate future demand are based on water meter readings for comparable University development, which includes total water demand associated with these sites, including landscape irrigation. No new irrigated open space is proposed as part of the LRDP other than landscaping associated with new development, which will be similar in scale to the landscaping associated with existing development. The water demand associated with such landscaping is thus captured by the water demand factors used.

**Response to Comment R-8-35.** Please see Master Response - Water Supply, section V.B.

**Response to Comment R-8-36.** Cumulative demand associated with buildout of lands within the service area of the Goleta Water District was taken directly from the Water District’s May, 2008 Water Supply Assessment (WSA) prepared and adopted in connection with the City of Goleta’s General Plan. The footnote to RDEIR Table 4.14-36 indicates the sources of the WSA’s growth estimates.

**Response to Comment R-8-37.** Regarding mitigation measure W-3G, please see Master Response - Water Supply, Section VI.A.

The University’s stated intention for buildout of the LRDP is to accommodate an average annual enrollment increase of about 1 percent per year, which translates into roughly 300 additional students per year. See DEIR at p. 3-20. Assuming a total enrollment increase of 5,000 additional students under the LRDP and an increase in water demand from buildout of the LRDP as 856 AFY, each new student will result in a demand increase of 0.171 AFY. If the University adds 300 students per year, the annual increase in water demand will be about: 0.171 AFY per student multiplied by 300, for a total of 51.3 AFY, which is considerably less than
the 154 AFY annual allocation available for new customers under the SAFE ordinance. Based on this and other projections, the RDEIR determined that with the identified mitigation, the LRDP will have a less than significant impact related to water supply. No further mitigation is required. For more information, see Master Response - Water Supply, section II.

Response to Comment R-8-38. The University is not subject to the requirements of Water Code Section 10910. Nonetheless, Appendix 4.14-1 provides the functional equivalent of the analysis required by Section 10910.

Wastewater

Response to Comment R-8-39. The 2007 Goleta West Sanitary District Master Plan is not incorporated by reference into the DEIR. It is, rather, a source of information used to prepare the RDEIR and is a cited source consistent with the requirements of CEQA Guidelines Section 15148.

Response to Comment R-8-40. Mitigation Measure WW-1B (RDEIR, p. 4.15-9) requires the University to seek additional wastewater treatment capacity to accommodate any growth that is above the campus’s share of the plant design capacity.

Response to Comment R-8-41. The methodology for estimating future wastewater generation is identical to that used by the Goleta West Sanitary District in its 2007 Master Plan.

Response to Comment R-8-42. The text on RDEIR page 4.15-11 has been revised as follows:

The City of Goleta’s General Plan is implemented as written adopted in 2006 (revised in 2007).

Memorandum - Attachment B

Response to Comment R-8-43. Appendix 4.13-3 of the RDEIR contains the documentation of the model development for the LRDP transportation impact analysis. The results presented below provide further justification as to the adequacy of the LRDP traffic model. As stated in the model development report, the LRDP model meets applicable calibration and validation requirements:

- Static Model Validation – The LRDP traffic model was validated to the same criteria as the City’s model and the results show that the LRDP model meets validation standards.

- Screenline Validation – The LRDP traffic model was validated to the nine screenlines established by the City and the results indicate that the LRDP and City model produce nearly identical results at seven out of nine screenline locations and two of the screenlines (Screenlines 8 and 9), which appear to be the most influenced by UC Santa Barbara trips, have a lower percent deviation with the LRDP model than with the City’s model.

- Traffic Volumes at Campus Gateways – Existing (2006) traffic volumes at the UC Santa Barbara campus gateways were compared to the City and LRDP model forecasts and the results show that the City’s model produces lower traffic forecasts at the UC Santa Barbara gateways than the LRDP model and the LRDP model’s distribution more closely resembles the distribution from the 2006 counts.

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Vehicle-Trip Generation - The number of vehicle-trips generated by the City's 2005 model was compared to the trip generation of the LRDP model for UC Santa Barbara land uses and other land uses in the immediate vicinity of the campus. The City's model contains more internal trips and intrazonal trips than the LRDP model, which is expected due to the TAZ refinement implemented in the LRDP model. In addition, intrazonal trips (by definition) do not produce vehicle-trips on the roadway network and do not affect the model forecasts. The LRDP model also contains a higher number of home-base college trip origins and fewer home-base college internal and intrazonal trips.

Response to Comment R-8-44. Appendix 4.13-3 contains the documentation of the model development for the LRDP transportation impact analysis. As stated in the model development report, the UC Santa Barbara population and housing data was modified as follows.

UCSB Students - 19,039 students in original model and 16,530 students in LRDP model – the reduction in students is due to the reclassification of students residing in residence halls on the main campus to "on-campus" resident students

UCSB Faculty/Staff - 9,528 employees in original model and 4,685 employees in LRDP model – the LRDP model removed part-time student employees from the faculty/staff count contained in the original model since these students are already on campus and included in the student land use category (EIR footnote: Table 3.0-5 of the UC Santa Barbara Draft EIR and the corresponding discussion on Page 3.0-13 explains the faculty and staff population data applied to the LRDP impact analysis. To avoid double counting the impact of students already on campus who happen to have an on-campus job, the 4,685 employee count was used as the baseline for looking at impacts)

Housing - 1,916 housing units on main campus and 1,789 units on Storke Campus in original model were revised as follows:

3,470 on-campus student beds (main campus Residence Halls)

1,325 student beds on Storke Campus (Francisco Torres Residence Hall)

904 student beds on Storke Campus (University Owned Apartments)

592 family housing units on Storke Campus (University Owned Apartments)

65 faculty/staff housing units on West Campus

Response to Comment R-8-45. Appendix 4.13-3 (pages 11-17) contains the documentation of the trip generation for the LRDP. As stated, the trip generation was based on a combination of traffic count data at existing University uses and travel survey data and validated to existing conditions as follows:

The trip generation rates based on travel survey data for students and faculty/staff were adjusted (increased) so that the trip generation of existing uses matched actual traffic counts at the campus gateways. Increasing the trip generation rates was necessary to account for visitor trips to/from campus (visitors are included in the trip generation rates for faculty/staff). In addition, although many students and faculty/staff typically commute to campus in a mode other than a SOV, they may occasionally drive to campus, which was not reflected in the travel survey results. The final trip generation rates applied to the LRDP traffic study produced existing forecasts that matched existing traffic counts on campus.
Response to Comment R-8-46. Traffic impacts and mitigation measures have been identified for roadways of concern noted in the City’s comment letter as shown in RDEIR Table 4.13-39 and summarized as follows: Intersection Impacts of Hollister/Storke, Phelps/Storke, US 101 NB Ramps/Calle Real/Storke, US 101 SB Ramps/Storke, US 101 SB Ramps/Los Carneros, Hollister/Los Carneros, US 101 NB Ramps/Fairview, US 101 SB Ramps/Fairview, Hollister/Fairview, Fairview/Calle; Roadway Impacts of Storke Road and Los Carneros Road. The LRDP TDF (Travel Demand Forecast) model projects traffic volume (or “travel demand”) increases at these facilities, and traffic impacts have been identified based on the City’s significance criteria. In addition, it should be noted that the LRDP has identified significant traffic impacts and mitigation measures for 14 of the 18 study intersections located in the City of Goleta and on the two major City roadways providing access to the University, Los Carneros Road and Storke Road.
March 30, 2009

University of California
Campus Planning & Design
Facilities Management
c/o UCSB Vision 2025
Santa Barbara, CA 93106-1030

By Email to
info@ucsbvision2025.com

RE: UC Santa Barbara LRDP Revised Draft EIR Comments

Dear UCSB:

This office represents the Storke Ranch Master Owners Association (SRMOA). We have reviewed the Revised Draft Environmental Impact Report (RDEIR) for UC Santa Barbara Long Range Development Plan (LRDP or Project), attempting to focus on the changes to the prior environmental review document.

Unfortunately, it appears that the University has ignored the purpose and requirements of CEQA and melded a partial EIR re-write to address some of the glaring flaws and omissions and to partially respond to selected comments, but without specifically identifying the changed text in the document or justifying why some comments were responded to and others ignored at this stage. The public’s review is compromised by the excessive length of the document, and the difficulty of providing cogent public comment is compounded by the lack of specific explanation of the revisions and changes, making detailed review tedious, resource intensive and challenging.

By this letter, we incorporate by reference all previous comments submitted by this office on behalf of the SRMOA concerning the UCSB LRDP and its environmental review document.

Sincerely,

LAW OFFICE OF MARC CHYTLIO

Marc Chytilo
For Storke Ranch Master Owners Association
Letter R-9

Law Office of Marc Chytilo

3/30/2009

Response to Comment R-9-1: The sections of the RDEIR completely replace the corresponding sections of the DEIR. The reasons for the revision and recirculation of each section are explained in the RDEIR Subsection 1.11 (p. 1.0-12).
-----Original Message-----
From: Susan and Augi Aguilera [mailto:msaguilera@cox.net]
Sent: Monday, March 30, 2009 3:53 PM
To: UCSB LRDP
Subject: Public comment to UCSB LRDP RDEIR

March 30,2009

University of California at Santa Barbara
Office of Campus Planning & Design
c/o Vision2025
Santa Barbara, CA 93106

Thank you for the opportunity to make comments. See our input below.

Sincerely,

Susan and Augi Aguilera
458 Orange Blossom Lane
Goleta, CA 93117

Water and drought

Water, perhaps the single biggest issue with UCSB's proposed LRDP. There is
simple not enough water available on the Central Coast to accommodate the
growth that UCSB plans, along with the proposed and approved growth for the
City of Goleta. With droughts always waiting in the wings, UCSB cannot assume
that it has a "right" to all the water it requires to keep on growing.

Traffic control and adequate flow of traffic

UCSB must complete the expansion of El Colegio rd in conjunction with Santa
Barbara County BEFORE initiating any improvements on adjacent roads in
Goleta. El Colegio connects University traffic to and from Storke Road. El
Colegio is a key artery in the flow of traffic and it is incomplete. It needs
to be completed into a double lane road both directions. Completing El
Colegio is imperative to handling the increased traffic demands of tomorrow. Traffic studies in the EIR did not adequately model the effects of completing El Colegio and the corollary – how leaving it ‘as is’ may impact traffic safety, particularly where it narrows. These effects are understated for both UCSB and the City of Goleta. Completing El Colegio is a mitigation action from a prior EIR that UCSB has not completed. UCSB should be held accountable. The LRDP needs to be revised to clearly indicate the El Colegio will be completed between Los Carneros and Storke Road BEFORE completing additional housing identified in the project. The DEIR needs to be revised and resubmitted for public comment.

The DEIR lacks information crucial to the analysis of impacts along Phelps and Mesa Roads. There are significant impacts associated with the proposed connection of these roads including traffic/circulation, air quality, noise and environmental justice impacts, which must be analyzed in a recirculated environmental review document. Alternatively, the proposed connection should be eliminated from the LRDP. The DEIR needs to be revised and resubmitted for public comment.

There is no Evaluation of Traffic Impacts to the Bayberry Lane/Phelps Road Intersection. The LRDP Project and proposed mitigation will create an unsafe situation at the intersection of Bayberry and Phelps event though Storke Ranch is not the focus of the UCSB LRDP. This impact is potentially significant and must be evaluated in a revised DEIR. The UCSB DEIR included a traffic/circulation analysis that omitted crucial information necessary for evaluating the effect that opening Phelps Road to through traffic will have on Storke Ranch residents and their guests’ ability to safely and easily enter and exit the neighborhood. There are only two roads that lead in and out of the Storke Ranch. One of them is Bayberry Lane, which intersects Phelps. Drivers exiting the Storke Ranch neighborhood must yield to through traffic. Despite these constraints the DEIR does not evaluate intersection operations or other traffic impacts at Bayberry Lane and Phelps. Discussed below, there are several potential impacts to this intersection that cannot be evaluated without this crucial information. I EXPECT EACH OF THE FOLLOWING POINTS to be addressed, as a minimum in a revised DEIR.

· No Data or Evaluation of Peak Morning Traffic Flows through the Phelps/Storke Intersection.

The EIR did not study Morning Peak intersection operations at the Phelps/Storke intersection. Similarly the DEIR did not study Peak AM operations at four other Goleta intersections, and at 8 of the 9 Santa Barbara County intersections studied during the PM Peak period. The DEIR and traffic study do not discuss this serious omission. It is simply not possible to analyze the impacts at these intersections without this vital information.

· Unreliable Counts of Existing Traffic on Phelps. The DEIR reported that 2,030 cars per day currently drive down the segment of Phelps road east of Storke. Further, conclusions regarding traffic, noise and air quality are all compromised because this traffic count forms the baseline from which these impacts are analyzed.

· Inconsistent Traffic Estimates at Phelps and Mesa Intersections. The DEIR projects a 5,600 [vehicle or ADT] increase in traffic volumes along the
easternmost segment of Phelps Road and a 2,600 increase along the westernmost segment of Mesa Road, caused by the proposed roadway improvements including the Phelps/Mesa connection. As noted by traffic engineer Tom Brohard, “(i)f the daily trips increase by 5,600 at the west end with the connection, then a similar increase can also be expected at the east end. Adding 3,000 more daily trips to the east end may result in further significant traffic impacts at Mesa Road/Los Carneros Road that must be disclosed, evaluated, analyzed, and mitigated.

- Underestimation of Future Transit Demand. As reported in newspapers around the country, demand for public transit is at historic highs due to ever increasing gas prices. With gas prices expected to continue rising, coupled with increasing awareness of global climate change, demand for public transit is likely to grow significantly by 2025. The DEIR does not account for this significant change in circumstances and instead bases projections of future transit demand on obsolete statistics.

- Traffic and Circulation Impacts. The DEIR identifies four significant impacts associated with increased traffic volumes on City of Goleta and Santa Barbara County roadways. Pp. 2.0-30. ‘Traffic-1’ and ‘Traffic-2’ relate to intersection operations resulting in unacceptable LOS conditions under cumulative plus project conditions. Pp. 2.0-30 – 2.0-31. ‘Traffic-3’ and ‘Traffic-4’ relate to roadway operations resulting in unacceptable LOS conditions under cumulative plus project conditions. P. 2.0-32. Although the DEIR proposes mitigation measures to address these impacts, all four remain significant after mitigation. Pp. 2.0-30 – 2.0-32. There are additional significant impacts that the DEIR did not identify, including intersection operation and safety-related impacts at the Bayberry Lane/Phelps intersection and impacts to the safety of children using Phelps road.

- Roadway Segment Operations. Phelps Road, just east of Storke Road is a minor arterial with a daily traffic volume of 2,030 (Note: this traffic count is very probably significantly lower, based on observations of area residents). Mesa Road, just west of Los Carneros is also a minor arterial with an existing daily traffic volume of 1,740. The proposed connection of Phelps and Mesa roads is projected to increase traffic along the Phelps Road segment to 7,700 cars per day and to increase traffic along the Mesa Road segment to 6,500 cars per day. Although this increase does not exceed the LOS C threshold, additional factors including the school present on Phelps may result in unacceptable roadway segment operations.

- Intersection Operations. The signalized intersection of Phelps Road and Storke Road currently operates at a LOS A during PM Peak period and projected to 2025 this intersection will still operate at LOS A. /the DEIR fails to include and analyze traffic volumes during the AM peak hour. As discussed above, the impact analysis is incomplete without this information). The LRDP itself will reduce the operations of this intersection to LOS B. /Id. /With the proposed roadway improvements including the connection of Phelps and Mesa Roads, this intersection will operate at LOS D during the PM Peak period. “The degraded LOS is due to the Phelps/Mesa connection and the additional vehicles that would travel through the Phelps Road/Storke Road intersection.”

- The signalized intersection of Mesa Road and Los Carneros currently operates at a LOS B during the AM peak hour and LOS C during the PM peak hour. Projected to 2025, this intersection is projected to operate at LOS C and the addition of the LRDP reduces the LOS to D. /Id. /With the LRDP and
proposed roadway improvements the LOS falls to LOS E. /Id. / The increase in traffic at these intersections is a direct result of the proposed connection between Phelps and Mesa roads. In the absence of the “mitigation measure” of opening Phelps and Mesa roads, Project impacts to these intersections and roadway segments is not significant.

· There are additional impacts directly attributable to the connection of Phelps and Mesa Roads that the DEIR did not identify. For example, the DEIR did not analyze operations at the Bayberry Lane and Phelps Road. Bayberry Lane is one of only two roads providing entry and egress to Storke Ranch, and exiting Storke Ranch vehicles must yield to traffic on Phelps. The substantial increase in traffic along Phelps Road may cause this intersection to operate at an unacceptable LOS, and this must be evaluated in a revised DEIR.

· A further impact that the DEIR did not identify is the unsafe situation at the Bayberry Lane/Phelps intersection caused by the opening of Phelps road to through traffic. Discussed above, the traffic study did not measure or evaluate operations at this intersection and the substantial increase in traffic along Phelps Road may cause this intersection to operate at an unacceptable LOS. Additionally the County’s thresholds of significance include the following: “Project access to a major road or arterial road would require a driveway that would create an unsafe situation or a new traffic signal or major revisions to an existing traffic signal.” Santa Barbara County CEQA Thresholds and Guidelines Manual (“CEQA Thresholds Manual”), p. 171.

Safety of Children and Pedestrians

A major impact the DEIR failed to identify, is that opening Phelps road to through traffic will significantly impact the safety of children that live, go to school, and play in the immediate area. This includes children on Phelps Road as well as Children on Mesa Road. Under the County CEQA thresholds a Project has a significant impact if it “adds traffic to a roadway that has design features...or receives use which would be incompatible with substantial increases in traffic (e.g. Rural roads...or residential roads with heavy pedestrian or recreational use, etc.) that will become potential safety problems with the addition of project or cumulative traffic.” CEQA Thresholds Manual, p. 171. The DEIR must be revised to address the potential safety problems as a result of the project.

The Isla Vista Children’s Center is located immediately adjacent to the proposed road connection and there is no solid fence around its playground. Luanne Miller, the executive director of the Isla Vista Youth Projects who operates the Center in Storke Ranch, testified that many parents walk their children to school along Phelps road. She spoke in opposition to the proposed road connection because of its health and safety impacts to the 100+ kids who use the playground right next to the connection. This is a significant impact that must be identified and mitigated in a revised DEIR. See CEQA Thresholds Manual, p. 171. The LRDP needs to be revised to clearly indicate the Phelps Road to Mesa Road connector will not be opened.

With so many child centered activities on Phelps Road and Mesa Road, another issue for both UCSB and the City of Goleta will be significantly higher liability. Traffic counts taken by Residents of Storke Ranch at the present-day cul-de-sac where Phelps Road terminates indicates traffic volumes of 32-34 vehicles per 24 hour period. Traffic estimates provided by UCSB, based on
erroneously low assumptions, indicate traffic volumes in excess of 7,000 vehicles per 24 hour period. The risk of accidents, including fatal accidents particularly involving children, will likely increase significantly. This was omitted from the LRDP DEIR. This is a serious and negligent omission. Since UCSB is driving the particular change to open Phelps Road - Mesa Road connector, they would be at least 50% liable for turning an otherwise very safe area into a dangerous, accident-prone zone. The DIR needs to be revised and resubmitted for public comment. The LRDP needs to be revised to clearly indicate the Phelps Road to Mesa Road connector will not be opened.

Environmental Impacts

Air Quality Impacts. There are two preschools on Phelps road; the Steps to Learning Preschool is located at 6901 Phelps Road, near the intersection of Phelps and Storke, and the Isla Vista Children’s Center located at 6842 Phelps Road, near the proposed connection of Phelps Road and Mesa Road. There is also a pool and tennis courts on either side of Phelps Road east of Storke Road. Additionally, both on the Phelps Road and Mesa Road segments are developed with residential units. These childcare and recreational facilities, as well as residential neighborhoods are considered sensitive receptor sites under CEQA. /See /DEIR p. 4.2-9 and County CEQA Thresholds Manual, p. 27. The DEIR demonstrates that the proposed connection between Mesa and Storke Roads will substantially increase traffic along the previously dead-end street. This substantial increase in traffic may result in unacceptable increases in both chronic and toxic exposure to air pollutants from vehicle emissions at these sensitive receptor sites. The DEIR must model these emissions and perform a Health Risk Assessment.

Noise Impacts. The noise impact analysis in the DEIR does not disclose the full extent of noise impacts associated with the Project and proposed mitigation. "Traffic on local streets located in the project area substantially contributes to existing ambient noise conditions." Traffic is currently the largest noise source in the LRDP project area, and is anticipated to be the largest noise source in the future." Notwithstanding that fact, the DEIR failed to collect sufficient data to analyze Project specific and cumulative noise impacts from Project area roadways. As discussed above, the noise study only measured traffic noise for 20 minutes at each location on one day this data set is too small to verifiably represent actual noise conditions, and cannot form the basis of any legitimate conclusions regarding baseline conditions against which to quantify the Project’s noise impacts. Further, the noise study did not model anticipated future noise levels along the easternmost portion of Phelps road. DEIR p. 4.9-33. This omission is particularly problematic because of the many noise-sensitive land uses in that area. Before the DEIR can reach any conclusions regarding its traffic noise impacts generally, and noise impacts associated with the proposed Phelps/Mesa connection in particular, more data must be collected and analyzed in a revised DEIR. These omissions are of sufficient magnitude to require recirculation of a revised draft to the Public.

Significant cumulative noise impacts to the Storke Ranch and student family housing neighborhoods are likely because of their close proximity to the airport. The low-income housing complex on the North side of Phelps is within the 60 dB contour for airport noise. The expected increase in traffic noise along Phelps and Mesa roads may push ambient noise levels above the County’s
65 dB threshold. This is a potentially significant impact which must be evaluated in a revised DEIR.

Significant noise impacts are more likely in the Storke Ranch area because of its many sensitive noise receptors. Several distinct types of sensitive noise receptors exist on this roadway segment including a daycare center, child and adult learning center, playground, swimming pool, tennis courts as well as residences. CEQA recognizes all of these land uses as sensitive noise receptors for which lower thresholds of significance must be used. Specifically the County CEQA thresholds provide that “a significant effect may also occur when ambient noise levels affecting sensitive noise receptors increase substantially but remain less than 65 dB(A) CNEL, as determined on a case-by-case level.”

CEQA Thresholds Manual, p. 132. Therefore even if ambient noise levels near the Phelps/Mesa roadway segment are below the 65 dB threshold, significant impacts may occur because of the numerous sensitive receptors in this area. For this reason, it is imperative that the EIR be revised to model noise impacts along the Phelps/Mesa roadway segment.

The Phelps/Mesa road connection will cause significant environmental impacts.

It will cause two intersections and two existing roadway segments to fall below acceptable LOS conditions.

It will significantly increase noise and air pollution levels in sensitive residential neighborhoods.

It will disproportionately affect residents of the affordable rental units located at the proposed connection point, generating environmental justice concerns.

Opening the connection will impact sensitive wetland habitats adjacent to Phelps and Mesa roads.

Failure to Collect Sufficient Data on Existing Noise Conditions. The noise study only measured noise levels on Project area roadways for twenty minutes at each location on one day. DEIR . Considering that traffic volumes fluctuate dramatically throughout the day, one twenty minute measurement of traffic related noise at each location is so woefully inadequate it is nearly meaningless. Inaccuracies in this baseline noise data compromise the impact analysis and the DEIR’s conclusions regarding noise impacts.

Failure to Model and Evaluate Noise Impacts along the Phelps/Mesa Roadway Segment. The noise study conducted by Fehr & Peters did not perform modeling of noise impacts along the proposed Phelps to Mesa roadway connection. This failure deprives the public of the ability understand how the LRDP and this roadway connection in particular will affect the Storke Ranch and student family housing neighborhoods.

Information contained within the DEIR clearly demonstrates the potential for significant noise impact. Specifically, the housing development located on the north side of Phelps is within the 60 Db contour for the airport. This means residents of this development in particular will be impacted by the cumulative noise environment, because the other developments in this immediate area are outside this contour.
The Proposed Connection between Phelps and Mesa Roads Causes Significant Unavoidable Environmental Impacts. The easternmost portion of Phelps Road passes through a quiet residential neighborhood, ending in a cul-de-sac. The westernmost portion of Mesa Road passes through UCSB student family housing. The proposed connection of these road segments will vastly increase traffic volumes through these neighborhoods and increase congestion at the Phelps/Storke intersection as well as at the Mesa/Los Carneros intersection. The DEIR must acknowledge these significant traffic/circulation impacts. Further, the increased traffic volumes in this area may have significant air quality impacts, particularly considering that multiple sensitive receptor sites including child care and recreational facilities are located along Phelps road. On the North side of Phelps immediately West of the proposed connection point is a development comprised of 36 affordable family rental units. The development includes space for after school activities, educational and social services programs, and includes a computer learning center which tutors children and adults to become computer literate. Introducing heavy traffic in the immediate vicinity of this development raises environmental justice concerns which must be addressed during environmental review.

Environmental Justice.

The State of California defines environmental justice as "the fair treatment of people of all races, cultures and incomes with respect to the development, adoption, implementation and enforcement of environmental laws, regulations and policies." Government Code § 65040.12. Impacts that disproportionately affect certain cultural or economic groups must be analyzed from an environmental justice perspective in an DEIR. A low cost rental-housing complex is located on the North side of Phelps road immediately adjacent to the proposed connection point with Mesa Road. Children from this complex currently utilize the cul-de-sac as a play area. Removal of the cul-de-sac and significant increases in through traffic may have unintended consequences on the residents of this housing complex. Discussed above, the traffic increase threatens the safety of children who play near and on the road, many of whom live in the low cost complex. The complex is already disproportionately exposed to higher noise levels because it is located within the 60 dB noise contour for the airport and the proposed road connection will substantially add to the cumulative noise levels. These traffic, noise and air quality impacts must be evaluated from an environmental justice perspective. Because opening Phelps Road to through traffic may disproportionately affect residents of the low income housing complex, and will cause a host of other impacts described herein, we strongly urge UCSB to abandon the Phelps/Mesa roadway connection. Revise the DEIR and resubmit it for public comment.

Bicycle Route

The Phelps/Mesa road connection will sever a heavily used East-West UCSB bicycle route, creating an unsafe area of bicycle/car interaction. Revise the DEIR and resubmit it for public comment.

Fire Access

Opening the connection will slow fire and emergency access along Phelps Road which is currently uninhibited by traffic and has through capability via the automatic gate at the end of Phelps Road. Revise the DEIR and resubmit it for public comment.
Public Transportation

Increasing Goleta’s public transit network in conjunction with UCSB’s LRDP is a viable solution to UCSB’s and the City’s traffic problems. This will generate more benefits and fewer impacts than the proposed Phelps/Mesa connection. Revise the DEIR address UCSB commitments to Public Transportation (in a comprehensive plan that includes actions, outcomes, budget, and timetable) and resubmit it for public comment.

Include in the revised DEIR an analysis of alternative feasible mitigation measures that could lessen environmental impacts including: Substantially increasing public transit opportunities. Enhancing public transit in West Goleta is a feasible alternative that would substantially lessen the Project’s impacts. Implemented as an alternative to the proposed Phelps/Mesa connection, increasing West Goleta’s transit service would eliminate impacts to the Storke/Phelps and Mesa/Los Carneros intersections, as well as eliminate the other traffic-related impacts caused by opening Phelps and Mesa Road to through traffic. The transit alternative will also reduce overall traffic impacts and provide a tangible benefit to a community currently bearing the brunt of UCSB’s traffic impacts.

Prohibiting freshmen and sophomore students from bringing cars to campus.

Widening El Colegio to two lanes along its entire length. Currently, El Colegio Road is one of the main access routes to UCSB and there is a bottleneck where the road narrows from 2 lanes in each direction to one lane in each direction. The university is currently planning to widen the portion of El Colegio between Los Carneros and Stadium Road as mitigation for the new UCSB graduate student housing north of El Colegio. The university should agree to fund Phase II of the widening project, west of Los Carneros, and include this in their traffic analyses in the DEIR.

Revise the EIR address UCSB commitments to Public Transportation (in a comprehensive plan that includes actions, outcomes, budget, and timetable) and resubmit it for public comment.

Rather than degrade existing neighborhoods by introducing campus traffic, UCSB must develop a sustainable solution to its traffic problem. It is likely that economic and environmental concerns prominently featured daily in the news are not of a temporary nature but are here to stay. Accordingly we as a society must develop functioning alternatives to our current one-car-one-driver paradigm. One option, considered before as a solution to traffic impacts introduced by the Camino Real shopping center, is a new bus network servicing West Goleta and UCSB. A functioning bus network in this area would benefit all West Goleta residents and would avert the need for the Phelps-Mesa connection, thereby safeguarding family neighborhoods.

The Camino Real Specific Plan, adopted by the County Board of Supervisors in 1997 included a transit plan to offset the traffic volumes generated by the Camino Real Shopping Center. Caltrans failed to implement the proposed transit plan, however it remains a viable alternative to increasing and improving peripheral streets to accommodate increased auto traffic. With projected demand for public transit much higher today than in 1997 due to increasing gas prices and other factors, improving West Goleta’s transit system may now be much more effective in reducing vehicular traffic than anticipated in the Camino Real Specific Plan.
Project Alternatives

UCSB faces significant geographic constraints to its expansion. The increase in student and faculty populations proposed in the LRDP pushes UCSB far beyond the carrying capacity of the land, as evidenced by the significant unavoidable traffic and other impacts identified in the DEIR. There are various potentially feasible Project alternatives that the DEIR failed to consider, which would help resolve this carrying capacity issue. One example, mentioned at the June 4, 2008 public hearing by Olivia Uribe, the associate director of SBCAN, is that UCSB develop a satellite campus in Santa Maria. Although the DEIR considered relocating new development and growth off campus, it only considered lands in the immediate vicinity of the existing campus. The Santa Maria satellite alternative would simultaneously further project objectives of the LRDP, reduce traffic and other impacts, and provide a much-needed opportunity for North County residents to attend UCSB closer to home.

Revise the EIR address UCSB commitments to Feasible Alternatives (in a comprehensive plan that includes actions, outcomes, budget, and timetable) and resubmit revised DEIR for public comment.

Feasible Alternatives can Substantially Lessen the Project’s Environmental Impacts. Under CEQA, a Project cannot be approved if there are feasible alternatives or mitigation measures that would substantially lessen the Project’s environmental impacts. Public Resources Code § 21002.

There are potentially feasible mitigation measures that would substantially reduce the traffic impacts of UCSB’s LRDP, which the EIR failed to consider. One mitigation measure, is that UCSB prohibit freshman and sophomore students from bringing cars to campus. Another mitigation measure suggested by numerous commenters at an earlier public hearing is substantially increasing public transit opportunities.

Enhancing public transit in West Goleta is a feasible alternative that would substantially lessen the Project’s impacts. Implemented as an alternative to the proposed Phelps/Mesa connection, increasing West Goleta’s transit service would eliminate impacts to the Storke/Phelps and Mesa/Los Carneros intersections, as well as eliminate the other traffic-related impacts caused by opening Phelps and Mesa Road to through traffic. The transit alternative will also reduce overall traffic impacts and provide a tangible benefit to a community currently bearing the brunt of UCSB’s traffic impacts. Revise the DEIR address UCSB commitments to Feasible Alternatives (in a comprehensive plan that includes actions, outcomes, budget, and timetable) and resubmit revised DEIR for public comment.

Limit Growth

Feasible Alternatives can Substantially Lessen the Project’s Environmental Impacts. Under CEQA, a Project cannot be approved if there are feasible alternatives or mitigation measures that would substantially lessen the Project’s environmental impacts. Public Resources Code § 21002. The Project’s size may simply exceed the carrying capacity of the area’s present and proposed future infrastructure. Located near sensitive lands, including wetlands, the UCSB campus can only grow to a certain size. Or can only grow at a measured pace – one synchronized with infrastructure improvements such as widening El Colegio Road, Obtaining Water, so on. Revise the DEIR address UCSB commitments to Feasible Alternatives (in a comprehensive plan that
includes actions, outcomes, budget, and timetable) and resubmit revised DEIR for public comment.

DEIR is Flawed

The revised DEIR remains inadequate!

The UCSB LRDP plan was created without consideration for adjacent, planned development in Goleta, CA, within a 10 mile radius of UCSB campus. Combined impacts of 2 hotels and Bishop Ranch development need to be considered in a revised UCSB LRDP and accompanying revised DEIR.

The DEIR Omits Significant Information, Avoids Essential Analysis, and Presents Inconsistent Data. “The purpose of an environmental impact report is to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment[.]” Public Resources Code § 21061. “[A] paramount consideration is the right of the public to be informed in such a way that it can intelligently weigh the environmental consequences of any contemplated action and have an appropriate voice in formulation of any decision.” Environmental Planning and Information Council v. County of El Dorado (1982) 131 Cal. App. 3d 350, 354. The LRDP DEIR omits crucial information necessary to evaluate the likely effect of the proposed Project on the environment and deprives the public of their right to intelligently weigh and comment upon the environmental consequences of the Project. Many impacted residents adjacent to UCSB cannot read English. The DEIR is not available to these affected individuals. UCSB has not adequately assessed, nor communicated various impacts to affected constituents in the Low Income Housing section of Storke Ranch at Phelps Road. Revise the DEIR address this serious omission and resubmit revised DEIR for public comment.

The DEIR MUST BE REVISED AND RECIRCULATED AGAIN. A lead agency is required to recirculate a DEIR when significant new information comes to light after the agency gives public notice of the draft DEIR’s availability. CEQA Guidelines § 15088.5 (a). “Significant new information” requiring recirculation includes disclosures showing:

A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented, A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance, A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project proponents decline to adopt it.

The draft DEIR is still so fundamentally and basically inadequate in nature that meaningful public review and comment are precluded.
Response to Comment R-10-1. Please see Master Response - Water Supply section II.

Response to Comment R-10-2. Phase 1 of the El Colegio Road widening project is completed, and Phase 2 is under construction; therefore, the EIR reasonably relied on its completion prior to commencement of development under the LRDP.

Response to Comment R-10-3. Please see the Master Response - Phelps/Mesa Connection.

Response to Comment R-10-4. Please see response to comment O-20-4.

Response to Comment R-10-5. Please see the Master Response - Phelps/Mesa Connection.

Response to Comment R-10-6. Please see the Master Response - Phelps/Mesa Connection.

Response to Comment R-10-7. The RDEIR estimates future transit ridership based on the best information available at the time it was prepared. As stated in RDEIR Impact TRAFFIC-8, transit ridership among new students, faculty, and staff is expected to be low, because all net new growth under the 2010 LRDP will be housed on campus. Please see response to comment O-20-8 for more information.

Response to Comment R-10-8. Please see the Master Response - Phelps/Mesa Connection.

Response to Comment R-10-9. A significant impact on the Phelps Road/Storke Road intersection due to an increase in traffic volumes is identified in the RDEIR (Table 4.13-39). Intersection improvements have been identified in RDEIR Mitigation Measure TRAFFIC -1A to reduce the impact to a less than significant level.

Please see response to comment O-20-4 regarding the analysis of AM peak traffic.

Response to Comment R-10-10. The 2010 LRDP will have a significant traffic impact on the intersection of Mesa Road/Los Carneros Road with or without the Phelps/Mesa connection. As shown in RDEIR Tables 4.13-41 and 4.13-46, this intersection would be significantly impacted during the AM and PM peak hours, and intersection widening pursuant to RDEIR Mitigation Measure Traffic-2A with and without the Phelps/Mesa roadway connection.

Response to Comment R-10-11. Please see the Master Response - Phelps/Mesa Connection.

Response to Comment R-10-12. Phelps Road is not in the County, but in the City of Goleta. Please see the Master Response - Phelps/Mesa Connection.

Response to Comment R-10-13. Please see the Master Response - Phelps/Mesa Connection.

Response to Comment R-10-14. The DEIR identifies program-level mitigation for impacts to transit service (see RDEIR, p. 4.13-158). In addition, Mitigation Measure TRAFFIC-1A(1) has been amended. Please see response to comment R-4-19.

Response to Comment R-10-15. Please see response to comment A-12-49.
Response to Comment R-10-16. Please see response to comment R-10-2.

Response to Comment R-10-17. Please see responses to comments A-12-48, A-13-1, and R-4-19 regarding the measures the University will undertake to improve transit service. If future UCSB-related transit demand would require bus routes in West Goleta, the University will work toward that end with the MTD, as noted in the referenced responses.

Response to Comment R-10-18. Please see response to comment A-12-66. Also, please see responses to comments A-17-5.0 for information on CEQA requirements regarding alternatives.

Response to Comment R-10-19. Please refer to response to comment R-10-17.

Response to Comment R-10-20. Please refer to EIR Section 2.0 (Summary) for a summary of the significant impacts identified in the EIR, and to Section 5.0 (Alternatives) for a comparison of the alternatives analyzed in the EIR and how each would alter the impacts of the proposed 2010 LRDP.

Response to Comment R-10-21. Planned development in Goleta, as described by the City in its General Plan, is included in the analysis of cumulative impacts. There currently is no pending proposal for development of Bishop Ranch.
March 26, 2009

University of California
Office of Campus Planning & Design
c/o Vision 2025
Santa Barbara, CA 93106-1030

To Whom It May Concern:

The Isla Vista Youth Projects has been providing programming and services to the community of Isla Vista since 1971. We enjoy a positive relationship with UCSB and appreciate the many ways we work together to better serve Isla Vista residents. We provide programming to student and staff families and serve as a site for student volunteers, pre-professional interns and part-time employment. We receive funding through IVCRC from student fees, appreciate UCSB staff who serve in a leadership capacity on our Board of Directors and are thankful for the many in-kind contributions we receive from the University.

Because of our close working relationship with UCSB, we feel it is both our responsibility and privilege to provide comments to the recently re-released Long Range Development Plan and Environmental Impact Report where there is potential impact on the quality of programs for the children and families who live in Isla Vista. Our primary concerns from the original release are still not addressed in the re-circulated draft plan:

We still do not find discussion or proposed measures to mitigate the impact the proposed growth in students, staff and faculty on schools, child care and other social services in Isla Vista / Goleta. Isla Vista is in an unincorporated section of our county and is extremely underserved. Any new growth in population will strain an already under-funded, over-utilized patchwork of services.

And, specifically, we remain extremely concerned about the proposal to extend Phelps Road as an alternate route to the campus. The projected increased traffic on Phelps Road through this quiet residential neighborhood will greatly impact one of our program sites, the Isla Vista Children’s Center. The Children’s Center is located on the left side of Phelps Road (heading east), and is separated from the road only by a bike path and sidewalk. We are concerned about the health implications on the youngest, most vulnerable population: babies, toddlers and preschoolers. The increase in pollution from vehicles, noise levels and particulate matter from tires will directly impact over 100 children who use the outdoor play space every day. As well, the increased vehicle traffic will have a corresponding increase in the possibility of injury accidents to parents and children as they walk to and from Isla Vista or the bus stop on Storke Rd. We question the need for an alternate route given the recent widening of El Colegio and recommend incentives for the use of alternate forms of transportation to eliminate the need to build more roads. If the extension of Phelps Road is approved, we urge UCSB to, at a minimum, provide mitigating measures such as stop lights, traffic calming devices, vegetative and cement retaining walls / sound barriers to protect children and families at the Isla Vista Children’s Center as well as the residents of Storke Ranch.

Sincerely,

LuAnn Miller
Executive Director
Response to Comment R-11-1. The impact of growth under the proposed 2010 LRDP on schools is addressed in Impact PUB-4. Impacts to other public services are discussed throughout Section 4.11, Public Services. Pursuant to CEQA, the LRDP’s contribution to these impacts is analyzed only to the extent that increased demand attributable to the LRDP would lead to physical effects on the environment, generally through the construction or expansion of facilities.

Response to Comment R-11-2. Please see the Master Response - Phelps/Mesa Connection.
Office of Campus Planning & Design
University of California, Santa Barbara
Santa Barbara, CA 93106

RE: Recirculated Draft EIR for UCSB’s proposed LRDP

The University of California, Santa Barbara has an enviable bicycle commute rate—50% students, and 9% faculty and staff choose to bicycle, using the most energy-efficient means of travel on our planet. It’s quiet, doesn’t pollute, takes 1/12 the infrastructure space of a car for travel and parking, promotes fitness, and costs little for the owner and our community.

We’re pleased that UCSB’s LRDP includes housing for all new students, staff and faculty on University land. This means that most trips to campus destinations can be responsibly made on foot or bike. Yet the Draft EIR Transportation section concentrates on how to accommodate more motor vehicles, not only to the exclusion of consideration of the effect on people who wish to bicycle instead, but also to the financial and environmental degradation of everybody.

We believe that the University can offer further cost-effective mitigations that will reduce motor vehicle trips made by new and current students/staff/faculty plus the non-university people who service their needs. In order to encourage more sustainable transportation, we suggest the following mitigation measures:

• Provide increased “individualized marketing” of transportation alternatives through the existing TAP office. (Since 2000, Australia has used it to effectively decrease car use by 4-15%, while increasing trips by foot, bike and bus.)

• Discourage freshmen and sophomore students from bringing cars to school.

• Include car sharing programs at all faculty/staff/student housing projects.

• Coordinate with the City of Goleta to provide safer bicycle access to the shopping and dining destinations of Calle Real, Old Town Goleta, and Camino Real Marketplace. Bike paths can be installed through Girsh Park, and along San Jose Creek via Goleta Beach.

• Improve and maintain existing bike paths on campus. Consider paving paths with a permeable material. Keep paths separated from motor vehicle roads whenever feasible.

• Provide secure, sheltered bicycle parking for overnight storage at faculty and staff units.

• Carefully consider the safe circulation of people on foot, bike and car on the Ocean Road intersections with the Isla Vista street connections.

• If the Pardall tunnel is removed, keep Pardall Road the major access route to campus from Isla Vista by continuing bicyclist priority across Ocean Road. That will support the Isla Vista Master Plan that emphasizes business development on Pardall. This is especially important before the proposed new bike ways running east from Ocean Road are constructed.
The Santa Barbara Bicycle Coalition is a countywide advocacy and resource organization that promotes bicycling for safe transportation and recreation.

- Construct new housing before more students are admitted, and before new staff/faculty are hired.
- Consider construction of more on-campus housing than the LRDP’s 6700 proposed increase of students/staff/faculty. This would mitigate pressure on housing for those servicing the new University people.
- For new housing, de-couple the cost of rental/purchase of units from car parking costs. Scale the cost of parking rental for units, increasing the price per vehicle for additional vehicles.
- Provide mechanisms to monitor all transportation mitigations for effectiveness, and either alter them or reduce University growth to keep conditions from deteriorating. Make the results available to the public.

The University is in a position to provide a model sustainable community development that others will emulate in the future. We ask you to consider the above measures that will serve to reduce dependence on motor vehicle use that is contributing to traffic congestion, accelerated resource depletion, inactivity, hardscape water runoff, and global climate change.

Respectfully yours,

[Signature]

Ralph Fertig, President
Santa Barbara Bicycle Coalition
Letter R-12
Ralph Fertig
Santa Barbara Bicycle Coalition

3/30/2009

Response to Comment R-12-1. The 2010 LRDP proposes a transportation network that includes all modes of travel. Regarding the effects of the LRDP on bicycle safety, please see response to comment I-44-8A.

Response to Comment R-12-2. Please see response to comment R-4-19 on measures the University will take to expand existing alternative transportation programs. The suggestion to use “individualized marketing” is noted.

Response to Comment R-12-3. Please see response to comment A-12-49.

Response to Comment R-12-4. Please see response to comment R-4-19, amending Mitigation Measure TRAFFIC-1A(I)(A).

Response to Comment R-12-5. Please see responses to comments A-12-48, A-13-1, and I-44-8A.

Response to Comment R-12-6. RDEIR Figures 4.13-4A and 4.13-4B illustrate the proposed 2010 LRDP bicycle and pedestrian facilities P, which include recreational, separated, and shared routes, and routes connecting with the regional bicycle network and with Isla Vista.

Response to Comment R-12-7. The suggested design features will be considered at the time specific projects are proposed under the 2010 LRDP.

Response to Comment R-12-8. Please see response to comment O-7-2.

Response to Comment R-12-9. Please see responses to comments O-7-2 and I-44-8.

Response to Comment R-12-10. Please see response to comment A-12-1.

Response to Comment R-12-11. In compliance with State CEQA Guidelines Section 21081.6, a Mitigation Monitoring Program will be adopted at the time of approval of the 2010 LRDP, which will ensure that the adopted mitigation measures are implemented. This information will be public and available through the UC Santa Barbara Office of Campus Planning and Design.
March 30, 2009

University of California Santa Barbara
Office of Campus Planning and Design
c/o Vision 2025
Santa Barbara, CA 93106-1030

Via e-mail www.UCSBVision2025.com
and hand delivery

RE: Comment Letter to the University of California at Santa Barbara 2008 Long Range Development Plan, Recirculated Draft Environmental Impact Report Sections

The Board of Directors of the Goleta Water District has directed me to submit this letter and attachments which together constitute the Goleta Water District’s formal comments on the University of California at Santa Barbara (the University) 2008 Long Range Development Plan (LRDP) Recirculated Draft Environmental Impact Report (RDEIR). These comments (Attachment A) focus on RDEIR Section 4.14, Water. In addition, the District provides comments on portions of RDEIR Section 4.10, Population and Housing, that discuss topics that affect water demand yet are not considered in the Water section. Attachment B consists of a copy of the 1991 Measure H91, Goleta Water District Ordinance No. 91-01, SAFE Water Supplies Ordinance (SAFE Ordinance) and the 1994 Measure J94, Goleta Water District Amendment to the SAFE Ordinance. Attachment C consists of written comments on LRDP RDEIR Section 4.14 made to Goleta Water District representatives by Mr. Bill Brennan, Executive Director of the Central Coast Water Authority (CCWA). Comments by Mr. Brennan are incorporated herein by reference.

GENERAL COMMENT

The Goleta Water District (the District) is a California Environmental Quality Act (CEQA) Responsible Agency which has discretionary approval power over the project. During the scoping and initial research period of the Draft Environmental Impact Report (DEIR), the District was not asked to participate in the development of the DEIR. Because of this, the District believes the RDEIR presents incomplete data regarding both current and future water supplies and demands. Below is a summary of the problematic issues within the RDEIR.

- The University misinterprets and incorrectly cites District documents as well as current regulations and ordinances. The RDEIR cites data from the District’s 2005 Urban Water Management Plan (UWMP) and May 22, 2008 Water Supply Assessment (WSA) for the City of Goleta. Significant changes have rendered much of the material in those documents obsolete; updates are included in the attached comments. The RDEIR additionally misinterprets regulations and ordinances in place (e.g., the SAFE Ordinance). The comments provided by the District will assist in a better analysis of these issues. The District is in the process of developing a Groundwater Management Plan (GWMP) leading to an updated Water Supply Management Plan (WSMP) and preparation of a 2010 Urban Water Management Plan. The District suggests that the University refer to these plans as well as work with the District in revising the RDEIR and in future planning.
The University states "rights" to specific water amounts, with these amounts used as a baseline for future development scenarios. This is inaccurate; certain water agreements between the University and the District are subject to modification and termination.

The University's water supply figures are overestimates. The University's analysis within the RDEIR demonstrates an incomplete understanding of Santa Barbara County's dynamic water supply system. Water supply figures are not static numbers; water supplies from groundwater, Lake Cachuma and the State Water Project (SWP) are constantly in flux and subject to legal, regulatory, seismic, and climatic constraints which can reduce availability. The RDEIR does not demonstrate a realistic understanding of how these constraints affect water supply.

The University assumes that greater water storage and pumping capacity equates to greater potable water supply, and that the increased use of recycled water will offset portions of future potable water demand. It is the District's opinion that pumping capacity does not equal water supply, and that recycled water cannot offset 100% of future potable water demand. Although improvements are being made to augment both potable and recycled water capacity, current and future water supply conditions warrant more conservative estimates of water supply. In addition, there is no market or funding for the recycled water production and distribution described in the University's document.

The University's water demand figures are underestimates. The University is not using the correct water duty factors (wdf). Usage estimates are based upon limited data periods; calculations should be derived from data that spans a longer period. The University should provide its calculations and support its conclusions with factual data. Absent such data, the District cannot accept the water duty factors as provided in the document.

The University's baseline water use calculations are incorrect and the most current data is not being used to support future demand calculations. Baseline calculations should come from current water usage values or usage at the time of application.

It is the District's opinion that within the RDEIR, the University must address these critical issues and develop more comprehensive mitigation options. In the current document, the RDEIR overestimates water supply and underestimates water demand. The District believes the University's LRDP potable water demand exceeds the District's available potable water supply. In accordance with CEQA, the proposed project will have Significant and Unavoidable Class I Impacts to potable water supply that cannot be feasibly mitigated during the planning period.

The Board of the Goleta Water District encourages the University to work cooperatively with the District in the future to make the most efficient and productive use of the community's limited water supplies.

Please see Attachment A for a detailed list of comments.

Respectfully,

Eric E. Ford
Interim General Manager
Goleta Water District

Att: Attachment A – Specific Comments on the UCSB LRDP Draft Recirculated EIR
Attachment C – Comments by Mr. Bill Brennan, Executive Director of the Central Coast Water Authority
Attachment A

UCSB LONG RANGE DEVELOPMENT PLAN

Recirculated Draft EIR Sections (RDEIR)

Comments on RDEIR Section 4.14 Water

Provided by the Goleta Water District

Section 4.10.2

Comment (1):
In addition to Section 4.14, the Goleta Water District (District) reviewed Section 4.10, Population and Housing, which discusses topics that affect water demand and are not considered in the water section.

Section 4.10.2 concludes that the Long Range Development Plan (LRDP) will directly and indirectly induce growth on and off campus. The section uses a figure of 2,214 non-university jobs that will be generated by the growth in campus jobs and population. Standard population analysis uses a multiplier of 1.2 jobs per household. The average size of a South Coast household is 2.6 persons. From this we calculate an additional 4,797 people not included in the growth in campus population. The LRDP does not offer an analysis of the additional water demand that will result from this increased commercial activity and any associated increase in local population.

Separately, the section discusses the "retiring in place" of up to one half of the University of California, Santa Barbara’s (University) current faculty and staff, and speculates that their replacements will live outside the immediate community. The District feels this is an unrealistic expectation and believes that the increased water demand of the replacement faculty and staff is not adequately addressed in the document.

Section 4.14, P. 4.14-1

Comment (2):
It should be added for clarity that the University’s 2008 LRDP was not included in the District’s 2005 Urban Water Management Plan (UWMP) analysis.

Section 4.14, P. 4.14-1, Paragraph 4

09 RDEIR:
If the District completes its plans to increase the contribution of recycled water to offset potable water demand, there will be sufficient supplies available from the District to meet LRDP demand under cumulative conditions. If not, then the combination of the 2008 LRDP at full development and other growth within the District may require more water than available through the District.

Comment (3):
Currently, the District does not have the plans or funds to increase the contribution of recycled water. The current market for recycled water is saturated. There is not sufficient funding to expand the District’s recycled water system under current market conditions.
Section 4.14, P. 4.14-2, The Cachuma Project

Comment (4):
It should be added that the Cachuma Operations and Maintenance Board (COMB) has no forecasts of what normal allocation will be in future years. The Cachuma Project is currently the subject of a water rights proceeding before the California State Board, which could adversely affect and indefinitely reduce total available water supply.

Section 4.14.1.2, P. 4.14-3 The Cachuma Project, Paragraph 2

Comment (5):
This paragraph makes several incorrect statements. While the District has, in the past, had a carry-over of a portion of its Cachuma allotment from one year to the next, this has resulted in exposure to the risk of Lake spills and the loss of that water. The District, going forward, intends to develop different supply management strategies, using both the Ground Water Management Plan (GWMP) and the Water Supply Management Plan (WSMP). It is not correct to assume the continuing use of this timing strategy.

With regard to the phrase, "banked groundwater (about 41,000AF)," the correct description of this water is the "SAFE Ordinance-mandated Drought Buffer" (Drought Buffer). The paragraph states that this water would be available for pumping in multiple dry years. Per the SAFE Ordinance, the Drought Buffer is available for pumping only if the allocation from Lake Cachuma is reduced, which may or may not occur during a dry year or period of dry years. Furthermore, the SAFE Ordinance specifically states that the Drought Buffer "cannot, under any circumstances, be used by the District as a supplemental water supply to serve new or additional demands for water within the District."

Section 4.14.1.2, P. 4.14-3 The State Water Project, Paragraph 1

09 RDEIR:
Under the District’s agreement with the CCWA, its share of the conveyance facilities that deliver SWP water to Cachuma Lake is limited to 4,500 AFY, which is used as the District’s basic supply.

Comment (6):
While this statement is factually accurate with regard to the District’s share of the conveyance facilities, the SAFE Ordinance states that for long term planning purposes, the District may not use more than 3,800 acre feet per year (AFY) as the State Water Project (SWP) yield. Current water supply availability through the SWP is more limited than in previous years; this year’s allocation is currently at 20% and could be reduced further.

Furthermore, a March 21, 2009 Los Angeles Times news article, “California’s water system at risk from a major Bay Area earthquake,” states that according to a Department of Water Resources report, there is a 40% probability in the next 25 years of an earthquake of magnitude 6.7 or higher causing 27 or more Sacramento-San Joaquin River Delta islands to flood at the same time. An earthquake of this magnitude would cause the earthen levees that help channel water to sink, leading to flooding on the islands and salt water intrusion into the freshwater delivery system. The state’s water system would be crippled and take about three years to repair.

Due to the continuing uncertainty about State water, the SWP figure should be a range from 0 - 3,800 AFY, not 4,500 AFY throughout the document.
Section 4.14.1.2, P. 4.14-3 Groundwater, Paragraph 1

09 RDEIR:
As of April 2008, the District was able to pump its five fully operational wells at a total rate of about 2,900 gallons per minute (gpm), which is equivalent to about 4,200 AFY if the wells are operated 90 percent of the time

Comment (7):
The functional ability of the District to pump its five operational wells at the above rate does not equal available water supply. The District can pump up to 2,350 AFY only if groundwater is above 1972 levels or a different amount limited by pumping capacity in a designated drought as defined by the SAFE Ordinance. See Comment 10, below, for further discussion.

Section 4.14.1.2, P. 4.14-4 Groundwater, Paragraph 1

09 RDEIR:
If the grant is approved, work on the San Ricardo well will begin in 2008

Comment (8):
The grant to rehabilitate the San Ricardo well was approved, however State funding may not be available. If State funding is not available, well rehabilitation plans could cease.

Section 4.14.1.2, P. 4.14-4 Groundwater, Paragraph 1

09 RDEIR:
These projects are intended to bring the District’s total groundwater production capacity up to about 6,700 AFY if all the wells were operated 90 percent of the time

Comment (9):
Similar to Comment 7; production capacity does not equal available water supply. At this time, funding sources for the two additional wells are unknown. If funding cannot be found, these project plans could cease.


09 RDEIR:
As a result of this adjudication, the GWD now has the right to pump 2,350 AFY of naturally occurring groundwater from this basin

Comment (10):
This statement needs clarification. As restricted by the provisions of the SAFE Ordinance, the District has the right to pump 2,350 AFY of groundwater if water is above 1972 levels. Only in a SAFE defined drought can water be pumped from below the 1972 levels.


09 RDEIR:
There is an additional 10,000 to 20,000 acre-feet of available storage remaining for additional banking

Comment (11):
The 10,000 to 20,000 acre-feet of available storage remaining for additional banking is an unverified estimate using a 10-20% porosity factor. While this number may have appeared in the UWMP, the District’s GWMP will assess these numbers; until this plan is completed, these numbers should not be relied on for any purposes.

09 RDEIR:
The District may pump the banked water at a rate of 400 AFY

Comment (12):
This is a misinterpretation of the District’s Water Supply Assessment (WSA). “Banked” water should be referred to as “stored” water throughout the document. Pumping stored water at a rate of 400 AFY is an estimate based on a historical number and is not guaranteed in the future. Therefore it should not be used as the GW/Conjunctive Use figure throughout the water supply analysis. The District’s WSMP will assess an appropriate conjunctive use figure; until this plan is completed, this number should not be relied on.


09 RDEIR:
As long as the basin holds water at a level above the level it held in 1972, then in normal years the District must maintain a 2,000 AF buffer above 1972 levels but otherwise may use the water in the annual amounts described above

Comment (13):
The sentence is incorrect and should be deleted.


09 RDEIR:
If the basin falls below the 1972 level, then in normal years, the District may only use its Wright Judgment entitlement; banked water is available only in dry years

Comment (14):
The statement is incorrect. If the basin falls below the 1972 levels, no water may be pumped in normal years. The Drought Buffer is only available during a SAFE defined drought year.


09 RDEIR:
The Goleta Sanitary District’s WTP currently (2008) has a seasonal treatment capacity of 3,000 AFY for recycled water. Improvements will enable the District to reliably increase the production of recycled water to about 3,300 AFY

Comment (15):
The District does not have the market, distribution, or storage capacity for recycled water at these estimates. Recycled water production capacity at Goleta Sanitary District (GSD) cannot be used as the figure for available recycled water that could be supplied by the District. Production capacity does not equal delivery feasibility or marketability. Therefore the figure 3,300 AFY is unreasonable and should not be used within the water supply analysis; the figure should remain at 1,000 AFY throughout the document.
Table 4.14-1. Water Supply Sources and Amounts Available to the Goleta Water District in Normal Rainfall Years

<table>
<thead>
<tr>
<th>Sources</th>
<th>Available Water Supplies in Future Years in Acre-Feet Per Year (Actual Deliveries Depend On Demand)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2010</td>
</tr>
<tr>
<td>Cachuma Project</td>
<td>9,322</td>
</tr>
<tr>
<td>State Water Project</td>
<td>4,500</td>
</tr>
<tr>
<td>Groundwater</td>
<td>2,350</td>
</tr>
<tr>
<td>GW/Conjunctive Use</td>
<td>400</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>16,572</strong></td>
</tr>
<tr>
<td>Recycled</td>
<td>1,000</td>
</tr>
<tr>
<td><strong>Total Plus Recycled</strong></td>
<td><strong>17,572</strong></td>
</tr>
</tbody>
</table>


Comment (16):

The table is inaccurate based on the following:

- Cachuma Project - Due to siltation and uncertainty about the annual Lake Cachuma recharge, from the years 2015 onward, a baseline of 9,000AF should be used. Refer to Comment 4
- State Water Project – Refer to Comment 6
- GW/Conjunctive Use – Refer to Comment 12
- Recycled Water – Refer to Comment 15

Based upon additional and updated analyses, the District has updated the data and recommends that the University use the following table in analyzing future water supplies:

<table>
<thead>
<tr>
<th>Sources</th>
<th>2010</th>
<th>2015 - 2030</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cachuma Project</td>
<td>9,322</td>
<td>9,000 *</td>
</tr>
<tr>
<td>State Water Project</td>
<td>0 - 3,800</td>
<td>0 - 3,800</td>
</tr>
<tr>
<td><strong>Annual Groundwater Right</strong></td>
<td>2,350**</td>
<td>2,350**</td>
</tr>
<tr>
<td>GW/Conjunctive Use</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>7% System Loss</td>
<td>(817 - 1083)</td>
<td>(795 - 1061)</td>
</tr>
<tr>
<td><strong>Total Potable Supply</strong></td>
<td>10,855 - 14,389</td>
<td>10,555 - 14,089</td>
</tr>
<tr>
<td>Recycled Water</td>
<td>1,000</td>
<td>1,000</td>
</tr>
<tr>
<td><strong>Total Plus Recycled</strong></td>
<td>11,855 - 15,389</td>
<td>11,555 - 15,089</td>
</tr>
</tbody>
</table>

* Based upon siltation and the Department of Water Resources 2008 White Paper
** Assumes levels are maintained at or above 1972 levels
Section 4.14.1.2, P. 4.14-8 Critical Dry Year – Cachuma Project

09 RDEIR:
The District also assumes that an average of 3,584 AFY of the Cachuma Surface Water Buffer is available for use during a critical dry year.

Comment (17):
The statement is incorrect; it is an assumption and needs to be removed. The University is double counting available supplies. The Cachuma Surface Buffer is only a timing strategy, not an additional source of water. Furthermore, to assume the buffer will continue in each critical dry year is incorrect. The District’s GWMP and WSMP will determine if any carryover is available in any given year. Refer to Comment 5.


09 RDEIR:
The District has sufficient banked groundwater (41,000 AF) to meet shortfalls in the other supplies in a critical dry year.

Comment (18):
The statement is incorrect. Stored groundwater below the 1972 levels may only be pumped in a SAFE defined drought. In addition, the SAFE Ordinance states: “The Drought Buffer cannot, under any circumstances, be used by the District as a supplemental water supply to serve new or additional demands for water within the District.” See Attachment B.

Section 4.14.1.2, P. 4.14-8 Critical Dry Year, Last Paragraph

09 RDEIR:
The supply of potable water available to the District in a critical dry year increases over time as the District supplements its other sources of potable water by drawing on its ‘banked’ groundwater drought resources.

Comment (19):
The sentence is unclear. The District may only draw stored groundwater below the 1972 levels in a SAFE defined drought, which may or may not be a critical dry year.

Section 4.14.1.2, P. 4.14-8 Critical Dry Year, Last Paragraph

09 RDEIR:
The SAFE ordinance allows the District to pump up to 3,950 AFY of previously stored groundwater to augment other supplies during critical dry years.

Comment (20):
The statement is incorrect and should be deleted. The 3,950 AFY figure is a number used by the District to address a hypothetical scenario using historical data, which is now unreliable. It is not a figure stated in the SAFE Ordinance. The SAFE Ordinance allows the District to pump its Drought Buffer only in a SAFE defined drought; the amount is limited to the District’s pumping capacity.
09 RDEIR:

| Section 4.14.1.2, P. 4.14-9 Table 4.14-2 |

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<thead>
<tr>
<th>Source</th>
<th>2010</th>
<th>2015</th>
<th>2020</th>
<th>2025</th>
<th>2030</th>
</tr>
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<tbody>
<tr>
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<td>6,898</td>
<td>6,898</td>
<td>6,898</td>
<td>6,898</td>
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<tr>
<td>State Water</td>
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<td>122</td>
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</tr>
<tr>
<td>Annual Groundwater Right</td>
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<td>2,350</td>
<td>2,350</td>
<td>2,350</td>
<td>2,350</td>
</tr>
<tr>
<td>Groundwater/Conjunctive Use</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Groundwater Above 1972</td>
<td>0</td>
<td>0</td>
<td>0</td>
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<td>0</td>
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<tr>
<td>SAFE Groundwater Drought Buffer</td>
<td>3,050</td>
<td>4350*</td>
<td>4350*</td>
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<td>Cachuma Surface Water Supply Buffer</td>
<td>0</td>
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<tr>
<td>7% System Loss</td>
<td>861</td>
<td>861</td>
<td>861</td>
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<tr>
<td>Total Potable Supply</td>
<td>11,437</td>
<td>11,923</td>
<td>12,646</td>
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</tr>
<tr>
<td>Recycled Water</td>
<td>1,000</td>
<td>1,000</td>
<td>1,000</td>
<td>1,000</td>
<td>1,000</td>
</tr>
<tr>
<td>Total Plus Recycled</td>
<td>12,437</td>
<td>12,923</td>
<td>13,646</td>
<td>13,646</td>
<td>13,646</td>
</tr>
</tbody>
</table>

* Assuming construction/development of two additional wells by the District in 2015 for a total pumping capacity of 6,700 AFY

Comment (21):
The table is inaccurate based on the following:

- Cachuma Project – It should be noted that the Cachuma Project figure of 6,898 is not a static number, this number is determined by the COMB participants and may be less in future critical dry years.
- Groundwater/Conjunctive Use – Refer to Comment 12
- SAFE Groundwater Drought Buffer – The SAFE Groundwater Drought Buffer figure depends on pumping capacity and the number of wells in operation. In a critically dry year, this figure is calculated by subtracting the Annual Groundwater Right from the available pumping capacity. In 2010, pumping capacity will remain at approximately 5,400 AFY, producing a SAFE Groundwater Drought Buffer figure of 3,050 AFY. By 2015 – 2030, pumping capacity could increase to 6,700 AFY if two additional wells are added, producing a SAFE Groundwater Drought Buffer figure of 4,350 AFY.
- Lake Cachuma Buffer – Refer to Comment 17
- Recycled Water – Refer to Comment 15

Based upon additional analyses, the District has updated the data and recommends that the University use the following table when analyzing future water supplies:

| Table 4.14-2, Projection of Goleta Water District Available Supply in a Critically Dry Year |
|-----------------------------------------------|--------|--------|--------|--------|--------|
| Sources                                      | 2010   | 2015   | 2020   | 2025   | 2030   |
| Cachuma Project                              | 6,898  | 6,898  | 6,898  | 6,898  | 6,898  |
| State Water Project                          | 122    | 122    | 122    | 122    | 122    |
| Annual Groundwater Right                     | 2,350  | 2,350  | 2,350  | 2,350  | 2,350  |
| Groundwater/Conjunctive Use                  | 0      | 0      | 0      | 0      | 0      |
| Groundwater Above 1972                       | 0      | 0      | 0      | 0      | 0      |
| SAFE Groundwater Drought Buffer              | 3,050  | 4350*  | 4350*  | 4350*  | 4350*  |
| Cachuma Surface Water Supply Buffer          | 0      | 0      | 0      | 0      | 0      |
| 7% System Loss                               | 861    | 861    | 861    | 861    | 861    |
| Total Potable Supply                         | 11,437 | 11,923 | 12,646 | 12,646 | 12,646 |
| Recycled Water                               | 1,000  | 1,000  | 1,000  | 1,000  | 1,000  |
| Total Plus Recycled                          | 12,437 | 12,923 | 13,646 | 13,646 | 13,646 |
Section 4.14.1.2, P. 4.14-9 Multiple Dry Years – Cachuma Project

09 RDEIR:
The District also assumes that an average of 3,584 AFY of the Cachuma Surface water Buffer is available for multiple dry years.

Comment (22):
The statement is incorrect. The District does not assume an average of 3,584 AFY of the Cachuma Surface Water Buffer to be available in multiple dry years, similar to the critical dry year scenario. Refer to Comment 17.

Section 4.14.1.2, P. 4.14-10 Multiple Dry Years – Groundwater

09 RDEIR:
The District may only draw on groundwater to the extent allowed by SAFE’s Drought Buffer requirements.

Comment (23):
The statement needs clarification. The sentence should read: The District may only draw on groundwater to the extent allowed by SAFE’s Drought Buffer requirements and constrained by the pumping capacity of District wells.

Section 4.14.1.2, P. 4.14-10 Multiple Dry Years – Recycled Water

Comment (24):
The District does not have the market, distribution, or storage capacity for recycled water at these estimates. Refer to Comment 15.

Section 4.14.1.2, P. 4.14-10 Table 4.14-3

09 RDEIR:

<table>
<thead>
<tr>
<th>Supply Source</th>
<th>Year 1</th>
<th>Year 2</th>
<th>Year 3</th>
<th>Year 4</th>
<th>Year 5</th>
<th>Year 6</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cachuma Project</td>
<td>9,322</td>
<td>9,322</td>
<td>9,322</td>
<td>6,898</td>
<td>6,898</td>
<td>6,898</td>
</tr>
<tr>
<td>State Water Project</td>
<td>2,533</td>
<td>2,533</td>
<td>2,533</td>
<td>2,533</td>
<td>2,533</td>
<td>2,533</td>
</tr>
<tr>
<td>Annual Groundwater Pumping Rights</td>
<td>2,350</td>
<td>2,350</td>
<td>2,350</td>
<td>2,350</td>
<td>2,350</td>
<td>2,350</td>
</tr>
<tr>
<td>Groundwater Conserving Use</td>
<td>1,450</td>
<td>1,450</td>
<td>1,450</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Groundwater Above 1972 Water Levels</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>SAFE Ordinance Required Groundwater Buffer</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>1,450</td>
<td>1,450</td>
<td>1,450</td>
</tr>
<tr>
<td>Cachuma Surface Water Supply Buffer</td>
<td>1,539</td>
<td>1,539</td>
<td>1,539</td>
<td>1,539</td>
<td>1,539</td>
<td>1,539</td>
</tr>
<tr>
<td>Total</td>
<td>16,638</td>
<td>16,638</td>
<td>16,638</td>
<td>17,215</td>
<td>17,215</td>
<td>17,215</td>
</tr>
<tr>
<td>Recycled Water Production</td>
<td>1,000</td>
<td>1,000</td>
<td>1,000</td>
<td>1,000</td>
<td>1,000</td>
<td>1,000</td>
</tr>
<tr>
<td>Total Plus Recycled</td>
<td>20,639</td>
<td>20,639</td>
<td>20,639</td>
<td>18,215</td>
<td>18,215</td>
<td>18,215</td>
</tr>
</tbody>
</table>

Notes:
1. Represents the average amount of unused Cachuma Project water carried over from prior years since 1994.
2. If the multiple dry year period is assumed to start in 2010, the total available supply of recycled water will increase to 3,300 AFY by 2015 as improvements to the wastewater treatment plant are completed.

Comment (25):
The table is inaccurate based on the following:

- Cachuma Project – It should be noted that these numbers would likely continue to drop in multiple dry years, especially in years 4, 5, and 6. To assume these figures remain constant is incorrect.
- State Water Project – The figure should consist of a range between 0-2,533, as the supply could be less than 34% in multiple dry years.
- Annual Groundwater Pumping Right – In Years 4, 5, and 6 this figure will be zero, because it is factored into the SAFE Ordinance Required Groundwater Drought Buffer.
- Groundwater/Conjunctive Use – Refer to Comment 12.
- Groundwater Above 1972 Water Levels – It should be noted that in years 1, 2, and 3, the stated 1,450 of available water is only an assumption, this water supply may or may not be available in multiple dry years.
- SAFE Ordinance Required Groundwater Buffer - The SAFE Groundwater Drought Buffer figure depends on pumping capacity and the number of wells in operation. For District calculations in Table 4.14-3, the District assumes in Years 4, 5, and 6, pumping capacity will remain at 5,400 AFY. It should be noted that pumping capacity could increase to 6,700 AFY if two additional wells are added.
- Cachuma Surface Water Supply Buffer – In year 1, the Cachuma Surface Water Supply Buffer should be a range of 0–3,584; in all subsequent years, this supply of water will not exist and should be assumed as zero. Refer to Comment 17.
- Recycled Water Production – Refer to Comment 15.
- Unaccounted for Water Losses at 7% should be added into the table.

Based upon additional analyses, the District has updated the data and recommends that the University use the following table in analyzing future water supplies:

<table>
<thead>
<tr>
<th>Supply Source</th>
<th>Year 1</th>
<th>Year 2</th>
<th>Year 3</th>
<th>Year 4</th>
<th>Year 5</th>
<th>Year 6</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cachuma Project</td>
<td>9,322</td>
<td>9,322</td>
<td>9,322</td>
<td>6,898</td>
<td>6,898</td>
<td>6,898</td>
</tr>
<tr>
<td>State Water Project</td>
<td>0 - 2,533</td>
<td>0 - 2,533</td>
<td>0 - 2,533</td>
<td>0 - 2,533</td>
<td>0 - 2,533</td>
<td>0 - 2,533</td>
</tr>
<tr>
<td>Annual Groundwater Right</td>
<td>2,350</td>
<td>2,350</td>
<td>2,350</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>GW/Conjunctive Use</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Groundwater Above 1972 Water</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Levels</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SAFE Groundwater Drought Buffer</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>5400*</td>
<td>5400*</td>
<td>5400*</td>
</tr>
<tr>
<td>Cachuma Surface Water Supply</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Buffer</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7% System Loss</td>
<td>(817 - 1,245)</td>
<td>(817 - 994)</td>
<td>(817 - 994)</td>
<td>(861 - 1,038)</td>
<td>(861 - 1,038)</td>
<td>(861 - 1,038)</td>
</tr>
<tr>
<td>Total Potable Supply</td>
<td>10,855 -</td>
<td>10,855 -</td>
<td>10,855 -</td>
<td>11,437 -</td>
<td>11,437 -</td>
<td>11,437 -</td>
</tr>
<tr>
<td></td>
<td>16,544</td>
<td>13,211</td>
<td>13,211</td>
<td>13,793</td>
<td>13,793</td>
<td>13,793</td>
</tr>
<tr>
<td>Recycled Water</td>
<td>1,000</td>
<td>1,000</td>
<td>1,000</td>
<td>1,000</td>
<td>1,000</td>
<td>1,000</td>
</tr>
<tr>
<td>Total Plus Recycled</td>
<td>11,855 -</td>
<td>11,855 -</td>
<td>11,855 -</td>
<td>12,437 -</td>
<td>12,437 -</td>
<td>12,437 -</td>
</tr>
<tr>
<td></td>
<td>17,544</td>
<td>14,211</td>
<td>14,211</td>
<td>14,793</td>
<td>14,793</td>
<td>14,793</td>
</tr>
</tbody>
</table>

*This figure could be 6,700AFY with the addition of two wells under consideration by the District.


Comment (26):
The University uses the District’s WSA that cites the 2007 draft State Water Project Delivery Reliability Report. This report was prepared prior to recent conditions that severely limit the State’s ability to move water through the California Delta. These limitations are due to endangered species concerns, judicial
constraints and the California Governor’s declared drought in February 2009. Allocation of state water is currently at 20% and could be reduced.

The University’s water supply analysis, including discussion of SWP reliability, should reflect the reality of current water supply conditions rather than conditions as they were in 2007 and earlier. The use of historic water delivery averages to determine future deliveries is inappropriate due to these changed circumstances.

Section 4.14.1.2, P. 4.14-12 Reliability of the Cachuma Project

09 RDEIR:
The approach of analysis of Cachuma deliveries by simulating a 76-year sequence based upon historical weather patterns restricts the subsequent simulation to no more extreme droughts or severe storms than have historically occurred

Comment (27):
To base reliability of the Cachuma Project on historical weather patterns is incorrect. The University needs to consider more extreme scenarios than have historically occurred. According to the Department of Water Resources’ (DWR) October 2008 White Paper entitled Managing an Uncertain Future, Climate Change Adaptation Strategies for California’s Water (pg. 2), “extreme climatic events will become more frequent, necessitating improvements in flood protection, drought preparedness and emergency response...historic hydrologic patterns can no longer be solely relied upon to forecast the water future.”


09 RDEIR:
The District’s conjunctive use program is one such option

Comment (28):
The statement is incorrect; the District’s WSMP will assess a conjunctive use program. Until this plan is adopted, its use cannot be relied upon and should be removed as a water supply source.

Section 4.14.1.2, P. 4.14-3 Siltation

09 RDEIR:
During the summer 2008 COMB will perform a bathymetric study to determine Cachuma’s current capacity

Comment (29):
The Cachuma Lake Bathymetric survey was completed in June 2008, with the final study completed in September 2008. The study revealed that the new lake capacity at the 750 foot elevation is 186,636 AF, resulting in a loss in capacity of 1,395 AF compared to the survey completed in 2000. This loss is due to siltation from storm runoff and a portion of the siltation results from the 2007 Zaca Fire. The next study is scheduled for 2010 to determine the continuing effects of the Zaca fire, which is expected to result in further capacity loss due to siltation. More frequent South Coast wildfires could accelerate the rate of siltation, thus more quickly reducing lake capacity. In addition to siltation, capacity could be affected by the implementation of a pass-through agreement regarding Santa Barbara’s Gibraltar Reservoir.

Overall, for the years 1956 – 2000, Lake Cachuma storage capacity at the 750 foot elevation fell from 203,000AF to 188,600AF, which is approximately 17,000 AF of loss due to siltation. Between the years 2000 – 2008, an additional 1,395 AF of loss has occurred; the rate of capacity loss due to siltation is approximately 358 AFY for the years 1956 - 2008. At this rate, approximately 6,000 AF of loss will occur during the University’s planning period from 2008 – 2025, further reducing lake capacity to 180,600 AF. Reduced storage capacity and changing climatic conditions affecting Lake Cachuma’s annual recharge could lead to reductions in the District’s normal annual allotment.
Section 4.14.1.2, P. 4.14-3 The SAFE Ordinance

09 RDEIR:
First, SAFE limits the water available for new service connections to 1% of the District’s yearly supply

Comment (30):
The statement needs clarification. The sentence should read: First, SAFE limits the water available for new service connections to a maximum of 1% of the District’s yearly potable supply.

The District’s yearly potable supply does not include recycled water and, pending District Board approval, may not include up to 800 AF of water delivered through the Goleta West Conduit.

Section 4.14.1.2, P. 4.14-14 The SAFE Ordinance, Paragraph 1

09 RDEIR:
According to the District, the conditions of paragraph 4 had all been met by 1997. GWD is thus authorized to provide new service connections each year, allocating no more than 1 percent of its total annual supply

Comment (31):
The University has misinterpreted the 1% potable water supply allocation. Although it is true that conditions of paragraph 4 were met in 1997, the conditions must be met annually. There could come a year when not all of the conditions are met. Therefore, authorization to provide new service connections each year is not guaranteed. Furthermore, in times of a SAFE defined drought, no new connections are permitted.


09 RDEIR:
The amount available for new connections each year is therefore 154 AFY (1% of 15,472 AFY)

Comment (32):
The figure of 154 AFY is unreliable. The amount available for new connections is re-calculated yearly, therefore the 1% potable water supply allocation figure of 154 AFY should not be used. Refer to Comments 30 and 31.

Section 4.14.1.2, P. 4.14-16 Table 4.14-4

<table>
<thead>
<tr>
<th>Water Supplies</th>
<th>2010</th>
<th>2015</th>
<th>2020</th>
<th>2025</th>
<th>2030</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cachuma</td>
<td>9,322</td>
<td>9,322</td>
<td>9,322</td>
<td>9,322</td>
<td>9,322</td>
</tr>
<tr>
<td>State Water Project (per SAFE)</td>
<td>3,800</td>
<td>3,800</td>
<td>3,800</td>
<td>3,800</td>
<td>3,800</td>
</tr>
<tr>
<td>Groundwater</td>
<td>3,350</td>
<td>2,350</td>
<td>2,350</td>
<td>2,350</td>
<td>2,350</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>16,472</strong></td>
<td><strong>16,472</strong></td>
<td><strong>16,472</strong></td>
<td><strong>16,472</strong></td>
<td><strong>16,472</strong></td>
</tr>
<tr>
<td>1% Per Year Allocation</td>
<td>154</td>
<td>154</td>
<td>154</td>
<td>154</td>
<td>154</td>
</tr>
</tbody>
</table>

Notes:
1. Does not include Lake Cachuma Surface Water Buffer.
2. SAFE directs that: “Due to the controversy concerning the physical ability of the State Water Project to deliver its contractual commitments, the District shall plan for the delivery of 3,500 acre-feet per year of water at the amount of five average long-term yields.” Therefore, 3,500 acre-feet is used for this calculation.
3. Does not include conjunctive use amounts. surplus water, return water or stored water

Source: Water Supply Assessment City of Goleta General Plan/Coastal Land Use Plan, May 22, 2008. Table 4.3
Comment (33):
The table is inaccurate based on the following:

- Cachuma – It should be noted that the Cachuma figure may be reduced by up to 800 AF of water that may not be considered as a potable water supply. Refer to Comment 30. Due to sitiation and uncertainty about the annual Lake Cachuma recharge, from the years 2015 onward, a baseline of 9,000 AF should be used. Refer to Comment 16
- State Water Project – It should be noted that while the 3,800 is used as the planning figure per SAFE, the figure is subject to judicial and other constraints, reducing supply to a range of 0 – 3,800
- 1% potable water supply allocation - Refer to Comments 30-32
- Notes (1) - This note implies the existence of the Lake Cachuma Surface Water Buffer as an additional source of water, which is incorrect. Refer to Comment 17
- Notes (3) – This note implies the existence of conjunctive use amounts, which is incorrect. Refer to Comment 12

Based upon additional analyses, the District has updated the data and recommends that the University use the following table in analyzing future water supplies:

<table>
<thead>
<tr>
<th>Water Supplies</th>
<th>2010</th>
<th>2015</th>
<th>2020</th>
<th>2025</th>
<th>2030</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cachuma Project</td>
<td>9,322</td>
<td>9,000</td>
<td>9,000</td>
<td>9,000</td>
<td>9,000</td>
</tr>
<tr>
<td>State Water Project (per SAFE)</td>
<td>0 - 3,800</td>
<td>0 - 3,800</td>
<td>0 - 3,800</td>
<td>0 - 3,800</td>
<td>0 - 3,800</td>
</tr>
<tr>
<td>Annual Groundwater Right</td>
<td>2,350</td>
<td>2,350</td>
<td>2,350</td>
<td>2,350</td>
<td>2,350</td>
</tr>
<tr>
<td>1% potable water supply allocation*</td>
<td>117 - 155</td>
<td>114 - 155</td>
<td>114 - 155</td>
<td>114 - 155</td>
<td>114 - 155</td>
</tr>
</tbody>
</table>

*Does not include 7% System Loss

Section 4.14.1.2, P.4.14-16 The SAFE Ordinance, Paragraph 1

09 RDEIR:
At those times, groundwater beyond the District's Wright Judgment entitlement may only be used during dry years, when Cachuma deliveries are restricted. In 2007, the District found that 1972 levels had been reached, and so the District had met its obligation to create the Drought Buffer and was free, pursuant to SAFE, to use banked groundwater during normal years.

Comment (34):
The first sentence is incorrect and should be deleted.

The second sentence should read: “…was free, pursuant to SAFE, to use stored groundwater above the 1972 levels during normal years.”


09 RDEIR:
As of December 2007, there was a total of about 6,000-12,000 AF of water in storage in the Central Basin above 1972 levels. This water is available for District production at a rate of 400 AFY in addition to its annual appropriative groundwater right of 2,350 AF.
Comment (35):
The first sentence needs further clarification. The sentence should read: As of December 2007, it was estimated that there might be a total of about 6,000-12,000 AF of water in storage in the Central Basin above 1972 levels.

The second sentence is incorrect. The production rate figure of 400 AFY is not a hard number. Until the District completes the GWMP, any University analysis using this figure is unreliable and should not be used throughout the document.

Section 4.14.1.2, P.4.14-17 Figure 4.14-2

99 RDEIR:

Comment (36):
The figure is inaccurate based on the following:

- 2,350 AFY Groundwater Entitlement – The description under “SAFE Limitations For Use” is incorrect; the groundwater entitlement may be pumped annually, only when the basin is above the 1972 water levels
- 2,000 AFY “drought buffer” – The figure is incorrect, the University has double counted available supplies; the 2,000 AFY figure should be deleted
- District “Banked” Groundwater (41,000 AF) – The correct term to use is the SAFE Drought Buffer; the SAFE Drought Buffer may only be pumped during a SAFE defined drought


99 RDEIR:
The District’s projection of future demand assumes future potable water demand will be partially offset by the increased use of recycled water

Comment (37):
The statement is incorrect. The University is assuming that recycled water will offset the increased potable water demand in the future, which is a misunderstanding of the District’s WSA. The District’s projection of
future demand does not assume potable water will be partially offset by recycled water. The District does not have the market, distribution, or storage capacity to increase the use of recycled water at these estimates. Refer to Comment 15.


Comment (38):
The Recycled/Potable Water Offset figure is not realistic and should be removed from Tables 4.14-5, 4.14-6, and 4.14-7. The unaccounted for water losses on each table should be 7% and the total demand figures need to be recalculated. Refer to Comments 15, 37, and 40.


Comment (39):
The information used in this RDEIR is outdated since the Best Management Practices (BMP) reporting data used is from 2004. Please refer to the updated information below.

It should be noted that the structure of the California Urban Water Conservation Council (CUWCC) BMPs was revised in December 2008.


Comment (40):
In January of 2005, JBS Associates Inc. completed a Water Distribution System Audit for the District. In the study, the District’s unaccounted for water loss was determined to be between 6% and 8% of total production. It should be noted that the District uses an average of 7% unaccounted for water losses for its calculations in the updated tables provided in this attachment.


09 RDEIR:
The water budgets are expected to be sent to customers by 2006

Comment (41):
The District has partnered with both the City and County of Santa Barbara to implement voluntary water budgets for landscape irrigation meters serving large landscapes through www.landscapebudgets.com. Currently, approximately 120 landscape accounts are signed up. Up until 2009, the program has been paid for through a grant obtained by the Santa Barbara County Water Agency, which has now ended. The District is currently exploring the option of sending information to customers once per month instead of participating in the www.landscapebudgets.com program.


09 RDEIR:
The District currently offers a $100 rebate to Commercial, Industrial and Institutional (CII) customers who purchase a qualifying washing machine

Comment (42):
The District offers High Efficiency Washing Machine (HEW) rebates to residential customers through the Smart Rebates program, administered by the CUWCC and partially funded through a grant from the DWR. The DWR funding is on hold at this time due to State budget constraints; it is estimated that District rebates are expended for this year. There is currently a CII rebate program in effect through the lead agency of Santa Barbara County. Over time, the rebate amounts have increased and the CII rebate program is now $350. The program was partially funded with a grant from DWR, which is also on hold at this time.

09 RDEIR:
District Staff provides conservation materials at several public events throughout the year such as the Sustainable Landscape Fair

Comment (43):
The Sustainable Landscape Fair has been phased out and replaced with other events such as the Santa Barbara Home Improvement Expo.


09 RDEIR:
The District is in the process of re-ranking its customers as Commercial, Industrial, and Institutional according to use

Comment (44):
Currently, all of the District’s customers in the CII sector are classified as Commercial even though some of the customers are Industrial or Institutional as defined by the CUWCC. BMP 9 requires that these classes of customers be separated. There are inherent problems with trying to re-classify (not re-rank) these customers in the District’s billing system. Research is ongoing in determining the classification of commercial customers by CUWCC standards. Since all customers are labeled “Commercial” in the District’s billing system (including Institutional and Industrial), they all qualify for rebates offered to the CII sector under this BMP.


09 RDEIR:
The District is currently conducting a rate study to determine if it would be feasible to implement an increasing block volumetric rate in the future

Comment (45):
This sentence should be removed. The District is no longer conducting a rate study to determine if it would be feasible to implement an increasing block volumetric rate in the future. The rate study was ended in 2005. The District currently implements conservation pricing in that all water is sold at a uniform volumetric rate. In addition, volumetric rates are deemed sufficiently consistent with the definition of conservation pricing because the total annual revenue from the volumetric rates is greater than or equal to 70% of the total revenue for the District.


09 RDEIR:
The District has implemented this BMP by designating a full-time Conservation Coordinator for the District

Comment (46):
Due to budgeting constraints and decreased staffing levels, the Conservation Coordinator is not a full-time position at this time.


Comment (47):
The District currently offers ultra low flow toilet (ULFT) and HEW rebates through the Smart Rebates Program, administered by the CUWCC and partially funded through a grant from DWR. The DWR funding is on hold at this time, and District rebates are estimated to be expended for this year.

09 RDEIR:
Annual potable water use on the Main Campus averaged 558 AFY between 1999 and 2004. When the demand from approved projects is added to existing demand, the total demand is about 872 acre-feet per year.

Comment (48):
The University does not provide a correct baseline figure for current potable water use. According to District records, the University’s most current potable water use was 687 AFY in 2008 and 703 AFY in 2007. For California Environmental Quality Act (CEQA) purposes, the District suggests the University use a figure of 700 AFY, rather than 872 AFY, as a baseline for current potable water use.

Section 4.14.1.5, P.4.14-24 Goleta Water District

09 RDEIR:
Such regulations include water supply treatment system testing and monitoring, as specified in Title 23

Comment (49):
This sentence contains a typographical error. The sentence should read Title 22, rather than Title 23.

Section 4.14.1.5, P.4.14-24 Goleta Water District

Comment (50):
It should be added that the District is the CEQA Responsible Agency for this project.

Section 4.14.1.5, P.4.14-24 Water Supply Assessment, Amended City of Goleta General Plan/Coastal Land Use Plan

Comment (51):
The District is in the process of reviewing the 2008 WSA because water supply conditions have changed. Refer to the General Comment. The District’s upcoming GWMP and WSMP will better reflect the realities of water availability in the future. The 2005 UWMP will be revised and superseded in 2010.

Section 4.14.1.5, P.4.14-25 SENATE BILL610 and SENATE BILL221, Paragraph 4

09 RDEIR:
Appendix 4.14-1 of this EIR is the functional equivalent of a water supply assessment for the 2008 LRDP

Comment (52):
Appendix 4.14-1 of the RDEIR is not the functional equivalent of a water supply assessment for the 2008 LRDP; this document was not prepared or approved by the District, which is the CEQA Responsible Agency.

Section 4.14.2.1, P.4.14-26 Standards of Significance

Comment (53):
The proposed standard reflects the fundamental fallacy in the entire water supply section. A more correct Standard would show:

If the University’s 2008 LRDP potable water demand exceeds the District’s available potable water supply in the planning period, it is a Class I Significant and Unavoidable Impact.

09 RDEIR:
This factor is calculated using a water demand duty factor of 0.152 AFY per dwelling unit.

Comment (54):
The housing water duty factor (wdf) is supported using data from two academic years, 2004/2005 and 2005/2006. This factor should be supported with data from a 5-10 year span to guarantee accuracy.

The District believes the University has calculated the 0.152 wdf using the following assumptions:

- An individual student will use 40 gallons of water per day
- An individual student will be in residence 300 days (from the University’s 2004 Infrastructure Study)
- The remaining 65 days of the year would have 40% campus occupancy (3 quarters of 20,000 students and 1 quarter (summer) of 8,000 students

Therefore:
40 gal. x 300 days = 12,000 gal.
40% x 40 gal. x 65 days = 1,040 gal.
12,000 + 1,040 = 13,040 gal. per student bedspace per year

Using 326,000 gal. = 1 AF,
13,040 gal./326,000 gal. = .04 AF per student bedspace per year

Using the University number of 3.8 bedspaces per housing unit,
0.04 x 3.8 = 0.152 AF per housing unit

The District questions the above calculation as follows:

- An individual student will use 40 gallons of water per day – References to United States college student water use ranges from a low of about 30 gal/day up to 75 gal/day. The University should provide factual data to conclude 40 gal/day. The wdf should also account for an increasing proportion of faculty, staff, graduate students and their families in campus housing; the University must incorporate these groups into the above estimate.

- 40% Campus Occupancy Rate - The assumption that campus housing will have a 40% occupancy rate for the summer months might be unrealistic. In addition to summer school students, the University houses outside organizations for various events over these months. In addition, faculty, staff, graduate students and their families are more likely to remain in University housing year round. The University should reflect these conditions in its calculations.

The University should provide its calculations and support its conclusions with factual data to support an accurate water duty factor. Absent such data, the District cannot accept the wdf as provided by the University.


Comment (55):
The District is concerned with the assumptions in this paragraph. Using a wdf of 0.152 AFY per unit “because residential water use at UC Santa Barbara is generally less than that of comparable multi-family housing in the community” is not a sound argument to support the University’s reasoning. Producing an
average water usage from only two academic years to support the stated wdf is not a realistic scenario. Refer to Comment 54.

Section 4.14.2.3, P.4.14-31 Table 4.14-9

09 RDEIR:

<table>
<thead>
<tr>
<th>Land Use Category</th>
<th>Quantity</th>
<th>Water Duty Factors</th>
<th>Total Potable Water Demand (AFY)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Housing</td>
<td>3,304 units³</td>
<td>0.152 AFY per unit</td>
<td>502</td>
</tr>
<tr>
<td>Instruction, Research and Other</td>
<td>Up to 1,900,000 assignable square feet</td>
<td>0.184 AFY per 1,000 square feet</td>
<td>354</td>
</tr>
</tbody>
</table>

Total Additional Future Demand From 2008 LRDP 856

Notes:
1. New units
2. See Table 4.14-10
3. Average of waste demands for classrooms and laboratories and other from "NO UWMF 7025"
4. See also Appendix A for water demand for individual service areas

Sources: UCSB and CMCA 2008

Comment (56).
The table is inaccurate based on the following:

- Housing – Refer to Comment 54
- Instruction, Research and Other – The University prepared a final Infrastructure Assessment Report in December of 2004. A wdf of 0.19289 can be calculated from the University’s data. The District believes this is a more appropriate wdf using University-specific calculations, rather than using the District’s UWMF figure of 0.184 for “classrooms, labs and other”
- To fully reflect the University’s anticipated overall water usage at the end of the planning period, the District believes the table should state current baseline usage (calculated by the District to be approximately 700 AFY) as well as usage associated with buildings the University describes as recently completed or approved. The University reports this number to be 256 AFY. Adding these two figures to the total in Table 4.14-9 will give total demand at the end of the planning period. Subtracting the baseline usage will total additional demand at the end of the planning period.

Based upon additional and updated analyses, the District has updated the data and recommends that the University re-title and use the following table in analyzing future water supplies:

<table>
<thead>
<tr>
<th>Land Use Category</th>
<th>Quantity</th>
<th>Water Duty Factors</th>
<th>Total Potable Water Demand (AFY)</th>
</tr>
</thead>
<tbody>
<tr>
<td>UWMP estimates from 1990 LRDP</td>
<td>TBD</td>
<td>0.152 AFY per unit</td>
<td>256</td>
</tr>
<tr>
<td>Housing</td>
<td>3,304</td>
<td>0.152 AFY per unit</td>
<td>502</td>
</tr>
<tr>
<td>Instruction, Research and Other</td>
<td>Up to 1,900,000 assignable square feet</td>
<td>0.19289 AFY per 1,000 square feet</td>
<td>367</td>
</tr>
<tr>
<td>Total Additional Demand From the 2008 LRDP and completion of the 1990 LRDP</td>
<td></td>
<td></td>
<td>1,125*</td>
</tr>
</tbody>
</table>

* Current baseline usage is an additional 700 AFY, and is not reflected in this value
Section 4.14.2.3, P.4.14-32 Table 4.14-10

09 RDEIR:

<table>
<thead>
<tr>
<th>Facility</th>
<th>Facility Type</th>
<th>Facility Size</th>
<th>R</th>
<th>RMA</th>
<th>HBO</th>
<th>L</th>
<th>LMA</th>
<th>UIC</th>
<th>UCA</th>
<th>RIC</th>
<th>F</th>
<th>FMA</th>
<th>RMA</th>
<th>LMA</th>
<th>V</th>
<th>VMA</th>
<th>AFY</th>
<th>Per Cent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Santa Barbara</td>
<td>Residential</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
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</tr>
<tr>
<td>1. Santa Barbara</td>
<td>Residential</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
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</tr>
<tr>
<td>2. Santa Barbara</td>
<td>Commercial/Industrial</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
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</tr>
<tr>
<td>3. Santa Barbara</td>
<td>Public Service</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
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</tr>
<tr>
<td>4. Santa Barbara</td>
<td>Other</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
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<tr>
<td>5. Santa Barbara</td>
<td>Total</td>
<td>100%</td>
<td>100%</td>
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<td>100%</td>
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<td>100%</td>
</tr>
</tbody>
</table>

Comment (57):
The table is inaccurate based on the following:

- The table does not provide reliable average use figures because it only gives one year's data rather than several. At least 5-10 year averages should be used
- Information on faculty housing should be incorporated into the table

Section 4.14.2.3, P. 4.14-33 Water Demand Duty Factors for Future Development, Paragraph 1 and 3

09 RDEIR:
Increased groundwater pumping would be limited to GWD's allocation of 2,350 AFY of the adjudicated groundwater basin's supply, plus banked groundwater up to the GWD's pumping capacity of 6,700 AFY which is expected by 2020.

This impact is considered adverse but not significant because, according to GWD's UWMP, GWD has already banked sufficient water to meet projected demands during critical dry and multiple dry years.

Comment (58):
The statement is incorrect; it is in violation of the SAFE Ordinance. To be consistent with the SAFE Ordinance, the ability of the District to meet projected demands during critical dry and multiple dry years is based solely upon maintaining water levels above the 1972 levels. The amount of water stored in prior years is not a consideration for servicing additional development if the water levels are below the 1972 levels.

Section 1, para. 2 of the SAFE Ordinance states that the "Drought Buffer cannot, under any circumstances, be used by the District as a supplemental water supply to serve new or additional demands for water within the district."


Comment (59):
This paragraph is not consistent with the SAFE Ordinance; "critical-dry years" must be replaced with "drought years" throughout the document.
Section 4.14.2.3, P. 4.14-34 LRDP Mitigation W-3A

09 RDEIR:
Recycled water will be used for bathroom fixtures and/or irrigation

Comment (60):
This mitigation measure needs to state that recycled water shall be used for both bathroom fixtures and irrigation. It should be added that for recycled water to be used in bathroom fixtures, health department standards shall be followed.

Section 4.14.2.3, P. 4.14-34 LRDP Mitigation W-3B

Comment (61):
Mitigation should read: Individually meter and/or sub-meter all new and existing University buildings. Maintain monthly meter reading data for all meters and provide data to the District.

Utilization of a graduated fee structure is not a mitigation option available to the University unless the graduated fee structure is revenue-neutral to the University, in line with the District’s fees and charges, pursuant to California State law.

Section 4.14.2.3, P. 4.14-34 LRDP Mitigation W-3C

09 RDEIR:
The water saving devices that will be installed shall include, but will not be limited to, the following: shower heads, toilets, urinals, washing machines and irrigation systems

Comment (62):
It should be added that water saving devices shall also include dishwashers and hot water recirculation systems.

Section 4.14.2.3, P. 4.14-35 LRDP Mitigation W-3G

Comment (63):
Mitigation W-3G is not a lawful CEQA mitigation measure. The California Supreme Court held in 2007 Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova ruling, that:

CEQA's "informational requirements may not be met simply by providing that future development will not proceed if the anticipated water supply for a project fails to materialize."

Section 4.14.2.3, P. 4.14-35 LRDP Mitigation W-3G

09 RDEIR:
1. When potable water demand is projected to be within 50 AF of the available supply for the areas subject to the 1991 Reclamation Agreement

Comment (64):
The amount of water discussed in Circumstance 1 requires modification. The 1991 Reclamation Agreement expires in October 2010, and may be terminated by written notice. Permit 14 can also be modified or terminated by the District at its sole discretion.
Section 4.14.2.3, P. 4.14-35 LRDP Mitigation W-3G

09 RDEIR:
Residual Significance: Less than significant

Comment (65):
The Residual Significance should read: Class I Significant and Unavoidable Impact. Refer to Comment 53.

Section 4.14.2.3, P. 4.14-36 Table 4.14-11
09 RDEIR:

| Table 4.14-11. Estimate of Supply and Demand to the Goleta Water District In 2025 and 2030 for Normal Years Including the 2008 LRDP |
|--------------------------------------------------|-----------------|-----------------|
|                                                   | Normal Year 2025 | Normal Year 2030 |
| Total Supply 1                                    | 16,212           | 15,672          |
|水管需求                                                   |
| Total Future Potable Demand Assumed By Goleta General Plan WSA For All Customers Within the GWD 2 | 15,269           | 15,733          |
| Recycled/Potable Water Offset                     | -750             | -1,000          |
| Additional Potable Demand From 1990 LRDP 1        | 854              | 856             |
| Total Future Potable Demand To GWD With 2008 LRDP | 15,575           | 15,586          |
| Overall Surplus (Potable Water Only)              | 1,197            | 982             |

Notes:
1. Excludes supplies only (See Table 4.14-11)
2. Including unaccounted for losses and future development under the Goleta General Plan and Goleta Water Management Plan
3. See Table 4.14-6


Comment (66):
The table is inaccurate based on the following:
- Total Supply - Refer to Comment 16
- Additional Potable Demand from the 2008 LRDP – Refer to Comment 56
- Recycled/Potable Water Offset – Refer to Comment 38
- Unaccounted for Water Losses at 7% need to be factored into the table. Refer to Comment 40.

Based upon additional and updated analyses, the District has updated the data and recommends that the University use the following table:

| Table 4.14-11. Estimate of Supply and Demand to the Goleta Water District In 2025 and 2030 for Normal Years Including the 2008 LRDP |
|--------------------------------------------------|-----------------|-----------------|
|                                                   | Normal Year 2025 | Normal Year 2030 |
| Total Potable Supply                              | 10,555 - 14,089 | 10,555 - 14,089 |
| 水管需求                                                   |
| Total Future Potable Demand Assumed By Goleta General Plan WSA For All Customers Within the GWD | 15,269           | 15,733          |
| Recycled/Potable Water Offset                     | 0               | 0               |
| Total Additional Demand From the 2008 LRDP and completion of the 1990 LRDP | 1,125            | 1,125           |
| Total Potable Demand                              | 16,394           | 16,876          |

Surplus/(Shortage) (5,839) - (2,305)* (6,321) - (2,787)*

* Including 7% System Losses

09 RDEIR:
The annual increased demand associated with the LRDP would be: 856/16 years = 53.5 AFY, which is slightly more than one-third of the 154 AFY annual limit set by the SAFE ordinance.

Comment (67):
The sentence is inaccurate in several respects. The annual 1% potable water supply allocation is not a static number; it changes yearly and is zero in years when the SAFE Ordinance conditions have not been met. The University has created an average annual demand figure that doesn’t accurately reflect the project-by-project nature of the LRDP, nor does it include the water demands from the remaining construction to be completed from the 1990 LRDP. The total increased demand over the period is 1125 AFY, not 856 AFY. Refer to Comments 30-32.


Comment (68):
The paragraph misinterprets the 1% potable water supply allocation. Refer to Comments 30-32.

Section 4.14.2.3, P. 4.14-37 Table 4.14-12

09 RDEIR:

<table>
<thead>
<tr>
<th>Table 4.14-12, Estimate of Supply, and Demand to the Goleta Water District During a Critical Dry Year, Including the 2008 LRDP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Supply</td>
</tr>
<tr>
<td>Demand</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
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<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>Total Demand</td>
</tr>
</tbody>
</table>

Comment (69): The surplus amounts shown in Table 4.14-12 are unrealistic. The table is inaccurate based on the following:
- Total Supply - Refer to Comment 16
- 2008 LRDP: The 2008 LRDP figure should factor in 1/3 of 256 AF (85 AF) remaining from the 1990 LRDP in Year 2010, 2/3 of 256 AF (170 AF) in Year 2013, and 256 AF in Year 2015. Years 2023 and 2030 would add the full amount of 1,125 AFY. Refer to Comment 56
- Recycled/Potable Water Offset - Refer to Comment 38
- Notes (1) – The comment is a misinterpretation of the SAFE ordinance and should be deleted
- Dry Year Demand Surcharge (7%) and Note (2) should be removed because this table refers to a standalone critical dry year.
Based upon additional and updated analyses, the District has updated the data and recommends that the University use the following table:

<table>
<thead>
<tr>
<th>Table 4.14-12. Estimate of Supply and Demand to the Goleta Water District During a Critically Dry Year, Including the 2008 LRDP</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Total Potable Supply</strong></td>
</tr>
<tr>
<td>12,298 - 12,820</td>
</tr>
<tr>
<td><strong>7% System Loss</strong></td>
</tr>
<tr>
<td><strong>Demand</strong></td>
</tr>
<tr>
<td>Single Family Residential</td>
</tr>
<tr>
<td>Multiple Family Residential</td>
</tr>
<tr>
<td>Commercial</td>
</tr>
<tr>
<td>Landscape</td>
</tr>
<tr>
<td>Agriculture</td>
</tr>
<tr>
<td><strong>2008 LRDP</strong></td>
</tr>
<tr>
<td><strong>Total Customer Demand</strong></td>
</tr>
<tr>
<td><strong>Dry Year Demand Surcharge (7%)</strong></td>
</tr>
<tr>
<td><strong>Recycled/Potable Water Offset</strong></td>
</tr>
<tr>
<td><strong>Total Potable Demand Including the 2008 LRDP</strong></td>
</tr>
<tr>
<td><strong>Total Potable Supply with 7% System Loss</strong></td>
</tr>
<tr>
<td><strong>Surplus/(Shortage)</strong></td>
</tr>
</tbody>
</table>

* Adding proportional amount of 1990 LRDP values until 2025. Refer to Comments 56 and 69


09 RDEIR:
The District has injected over 6,800 AF into the basin that is now available for use

Comment (70):
The statement needs clarification. The 6,800 AF of injected water is not necessarily available for use; the 6,800 AF of injected water was used to rehabilitate the aquifer and to recharge the basin to 1972 water levels. Only in a SAFE defined drought is this water available for use.

The 6,800 AF of injected water is dynamic number that changes and cannot be assumed as constant. For example, water is currently being removed from the basin to blend with treated Lake Cachuma water due to the impacts on water quality resulting from the 2007 Zaca Fire. In addition, the District does not control private pumping that also draws water from the basin.
### Table 4.14-13

<table>
<thead>
<tr>
<th></th>
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<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Supply</td>
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<td>Cachuma Project</td>
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<td>3,372</td>
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<td>Annual Groundwater Right</td>
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<td>Groundwater Above 1972 Water Levels</td>
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<td>SAFE Groundwater Drought Buffer</td>
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<td>Total Supply</td>
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<td>Demand</td>
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<tr>
<td>Multi-Family Residential</td>
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<td>Landscape</td>
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<td>Agriculture</td>
<td>2,908</td>
<td>2,908</td>
<td>2,908</td>
<td>2,908</td>
<td>2,908</td>
<td>2,908</td>
<td>2,908</td>
<td>2,908</td>
<td>2,908</td>
</tr>
<tr>
<td>Total Daily Demand including 2007 LRDP</td>
<td>15,251</td>
<td>15,347</td>
<td>15,434</td>
<td>15,520</td>
<td>15,606</td>
<td>15,692</td>
<td>15,778</td>
<td>15,864</td>
<td>15,950</td>
</tr>
<tr>
<td>Surplus/Deficit</td>
<td>1,421</td>
<td>1,325</td>
<td>1,221</td>
<td>1,117</td>
<td>1,013</td>
<td>909</td>
<td>805</td>
<td>701</td>
<td>601</td>
</tr>
</tbody>
</table>

**Notes:**
1. Total spill capacity is 8,700 AFY.
2. Drought buffer proposed as allowed by SAFE.
3. "Available supply" as required for the first three years because of critical water shortage.
4. Assumes demand in 2028 through 2027 is 100% of annual year demand. Increased demand is assumed to occur in 2028, 2029, and 2030, because the Cachuma would rise in years four to six of an extended drought and all the water is implemented in a demand reduction program.
5. Represents the average amount of Cachuma Project water spilled over in previous year spillage.

**Cachuma Project:** Refer to Comment 25

**State Water:** Refer to Comment 25

**Annual Groundwater Right:** In Years 2028, 2029, and 2030, this figure will be zero because it is factored into the SAFE Groundwater Drought Buffer

**Groundwater/Conjunctive Use:** Refer to Comment 12

**Groundwater Above 1972 Water Levels:** Refer to Comment 25

**SAFE Groundwater Drought Buffer:** In Years 2028, 2029, and 2030, District pumping capacity is estimated at 6,700 AFY, assuming two wells have been added

**Lake Cachuma Surface Water Buffer:** Refer to Comment 25

**2007 LRDP Demand:** Refer to Comments 56 and 69

**Unaccounted Losses (6%)** Refer to Comment 41

**Recycled/Potable Water Offset:** Refer to Comment 38
Based upon additional analyses, the District has updated the data and recommends that the University use the following table:

<table>
<thead>
<tr>
<th>Table 4.14-13. Estimate of Supply and Demand to the Goleta Water District for Multiple Dry Years of 2025 through 2030 Including the 2008 LRDP</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Supply</strong></td>
</tr>
<tr>
<td>Cachuma Project</td>
</tr>
<tr>
<td>State Water Project</td>
</tr>
<tr>
<td>Annual Groundwater Right</td>
</tr>
<tr>
<td>GW/Conjunctive Use</td>
</tr>
<tr>
<td>Groundwater Above 1972 Water Levels</td>
</tr>
<tr>
<td>SAFE Groundwater Drought Buffer</td>
</tr>
<tr>
<td>Lake Cachuma Surface Water Buffer</td>
</tr>
<tr>
<td><strong>Total Potable Supply</strong></td>
</tr>
<tr>
<td><strong>Total Potable Supply with 7% System Loss</strong></td>
</tr>
<tr>
<td><strong>Demand</strong></td>
</tr>
<tr>
<td>Single Family Residential</td>
</tr>
<tr>
<td>Multiple Family Residential</td>
</tr>
<tr>
<td>Commercial</td>
</tr>
<tr>
<td>Landscape</td>
</tr>
<tr>
<td>Agriculture</td>
</tr>
<tr>
<td>2008 LRDP (including completion of the 1990 LRDP, Table 4.14-9)</td>
</tr>
<tr>
<td>Total Customer Demand Inclusive of 2008 LRDP</td>
</tr>
<tr>
<td>Dry Year Demand Surcharge (7%)</td>
</tr>
<tr>
<td>Recycled/Potable Water Offset</td>
</tr>
<tr>
<td><strong>Total Demand Including the 2008 LRDP</strong></td>
</tr>
<tr>
<td><strong>Surplus/(Shortage)</strong></td>
</tr>
<tr>
<td>(6,062) - (373)</td>
</tr>
</tbody>
</table>

* Includes the Total Additional Demand From the 2008 LRDP including completion of the 1990 LRDP


Comment (72):
The University is assuming the use of recycled water will reduce future potable water demand, thus freeing supplies for future development. This assumption is both invalid and infeasible; it should not be used to calculate future potable water supplies.
Section 4.14.2.3, P. 4.14-44 Potential Effects of Limited Recycled Water Capacity, Paragraph 1

09 RDEIR:
The District has adopted a capital improvement program which would provide expanded recycled water capacity. However, the program is not currently funded.

Comment (73):
It should be added that there are no plans to fund this capital improvement program. The market for recycled water is saturated and no funding currently exists.

Section 4.14.2.3, P. 4.14-44 Potential Effects of Limited Recycled Water Capacity, Paragraph 1

09 RDEIR:
Water supply demand...would exceed GWD supplies by approximately 17 AFY.

Comment (74):
The deficit figure of 17 AFY arrived at in the document is unrealistic based on the District's supply and demand comments. The deficit figure of 17 AFY should be higher. The District's calculations indicate the deficit could go as high as 6,247 AFY.

Section 4.14.2.3, P. 4.14-44 Table 4.14-14

09 RDEIR:

<table>
<thead>
<tr>
<th></th>
<th>Normal Year 2025</th>
<th>Normal Year 2030</th>
</tr>
</thead>
<tbody>
<tr>
<td>Potable Supply</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lake Cachuma</td>
<td>9,222</td>
<td>9,122</td>
</tr>
<tr>
<td>State water project</td>
<td>4,500</td>
<td>4,500</td>
</tr>
<tr>
<td>Groundwater</td>
<td>2,380</td>
<td>2,380</td>
</tr>
<tr>
<td>Groundwater/Conjunctive Use</td>
<td>420</td>
<td>420</td>
</tr>
<tr>
<td>Total Supply (potable only)</td>
<td>16,672</td>
<td>16,572</td>
</tr>
<tr>
<td>Potable Demand</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Future Potable Demand Assumed By Goleta General Plan 2025 for All Customers Within the GWPD</td>
<td>16,405</td>
<td>16,842</td>
</tr>
<tr>
<td>Unaccounted for Losses (5%)</td>
<td>994</td>
<td>991</td>
</tr>
<tr>
<td>Recycled/Potable Water Off</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Additional Potable Demand From 2008 LRDP</td>
<td>389</td>
<td>396</td>
</tr>
<tr>
<td>Total Future Potable Demand To GWD With 2008 LRDP</td>
<td>16,813</td>
<td>16,588</td>
</tr>
<tr>
<td>Overall Surplus (Potable Water Only)</td>
<td>447</td>
<td>17</td>
</tr>
</tbody>
</table>

Notes:
1. Including Goleta General Plan and a little Master Plan

Comment (75):
The surplus/deficit amounts shown in Table 4.14-14 are unrealistic. The table is inaccurate based on the following:
- Lake Cachuma Supply - Refer to Comment 33
- State Water Project - Refer to Comment 6
- Groundwater/Conjunctive Use - Refer to Comment 12
- Unaccounted For Losses (5%) - Refer to Comment 40
- Recycled/Potable Water Offset - Refer to Comment 38
- Additional Potable Demand From the 2008 LRDP - Refer to Comment 56
Based upon additional analyses, the District has updated the data and recommends that the University use the following table:

| Table 4.14-14. Estimate of Goleta Water District 2025 and 2030 Supply and Demand for Normal Years Assuming No Offset From The Increased Use of Recycled Water |
|--------------------------------------------------|-----------------|-----------------|
| Potable Supply                                   | Normal Year 2025| Normal Year 2030|
| Cachuma Project                                 | 9,000           | 9,000           |
| State Water Project                             | 0 - 3,800       | 0 - 3,800       |
| Annual Groundwater Right                        | 2,350           | 2,350           |
| GW/Conjunctive Use                              | 0               | 0               |
| Total Potable Supply                             | 11,350 - 15,150 | 11,350 - 15,150 |
| Total Potable Supply with 7% System Loss         | 10,555 - 14,089 | 10,555 - 14,089 |
| Potable Demand                                   |                 |                 |
| Total Future Potable Demand Assumed By Goleta    |                 |                 |
| General Plan WSA For All Customers Within the GWD| 14,405          | 14,842          |
| Recycled/Potable Water Offset                   | 0               | 0               |
| 2008 LRDP (including completion of the 1990 LRDP, Table 4.14-9) | 1,125 | 1,125 |
| Total Demand Including the 2008 LRDP*            | 15,530          | 15,967          |
| Surplus/(Shortage)                               | (4,975) - (1,441) | (5,412) - (1,878) |

* Includes the Total Additional Demand From the 2008 LRDP including completion of the 1990 LRDP

Section 4.14.2.3, P. 4.14-45 Effect and Feasibility of Mitigation, Paragraph 1

Comment (76): Paragraph 1 misinterprets the 1% potable water supply allocation. Refer to Comments 30-32.

Section 4.14.2.3, P. 4.14-46 Surface Water – The State Water Project, Paragraph 1

Comment (77): The University claims that “this source of additional water has a high likelihood of being available”. SWP is a supplemental supply of water; it should not be the primary source of water to support new development because it is subject to various legal, regulatory, and climatic constraints which reduce availability.

To meet the CEQA standard for an adequate water supply, the California Supreme Court held in the 2007 *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* that:

“Future water supplies identified and analyzed in an EIR must be reasonably likely to prove available; speculative sources and unrealistic allocations such as “paper water” do not provide an adequate basis for decision making under CEQA”.

Section 4.14.2.3, P. 4.14-46 Surface Water – The State Water Project (1)

09 RDEIR: The University can purchase an unused allotment of SWP water from the Santa Barbara County Flood Control and Water Conservation District
Comment (78):
This measure is a misinterpretation of the SWP. The University is not able to purchase an unused allotment of SWP water from the Santa Barbara County Flood Control and Water Conservation District (SBCFCWCD). The Central Coast Water Authority (CCWA) is the responsible agency, as known through the 1991 Transfer of Financial Responsibility agreement with the SBCFCWCD and the Water Supply Agreements with the individual project participants. Therefore, all State water purchase agreements must first be approved by the CCWA. Regardless of the responsible agency, all 43,486 AF of State water are spoken for and no more water, treatment plant, or pipeline capacity exists to make this option feasible (see Attachment C).

Section 4.14.2.3, P. 4.14-46 Surface Water – The State Water Project (2)

09 RDEIR:
The University can acquire an unused allotment of SWP water from another CCWA member agency

Comment (79):
This measure needs clarification. Although it is true that the University can acquire an unused allotment of SWP water from another CCWA member agency, and agencies must express interest in selling unused Table A allotments. To date, only the Carpentaria Valley Water District (CVWD) has expressed interest in selling, and is also in negotiations to sell the water to other customers. For planning purposes, the University should not count on option 2 unless current negotiations with the CVWD are already in place (see Attachment C).

Section 4.14.2.3, P. 4.14-46 Table 4.14-15

09 RDEIR:

Table 4.14-15. State Water Entitlements in Santa Barbara County

<table>
<thead>
<tr>
<th>Agency/Participant</th>
<th>Allocation (AFY)</th>
<th>2005 Deliveries</th>
<th>Percentage of Allocation</th>
</tr>
</thead>
<tbody>
<tr>
<td>California Cities Water Company</td>
<td>6,200</td>
<td>3,594</td>
<td>58%</td>
</tr>
<tr>
<td>Carpinteria Valley Water District</td>
<td>2,000</td>
<td>493</td>
<td>25%</td>
</tr>
<tr>
<td>City of Buellton</td>
<td>1,774</td>
<td>1,774</td>
<td>100%</td>
</tr>
<tr>
<td>City of Goleta</td>
<td>1,000</td>
<td>1,000</td>
<td>100%</td>
</tr>
<tr>
<td>City of Santa Barbara</td>
<td>3,200</td>
<td>749</td>
<td>24%</td>
</tr>
<tr>
<td>City of Santa Maria</td>
<td>16,200</td>
<td>15,828</td>
<td>98%</td>
</tr>
<tr>
<td>Goleta Water District</td>
<td>4,500</td>
<td>3,100</td>
<td>69%</td>
</tr>
<tr>
<td>La Cumbre Mutual Water Co</td>
<td>1,000</td>
<td>310</td>
<td>31%</td>
</tr>
<tr>
<td>Montecito Water District</td>
<td>3,000</td>
<td>743</td>
<td>25%</td>
</tr>
<tr>
<td>Moorpark Land Company</td>
<td>200</td>
<td>94</td>
<td>47%</td>
</tr>
<tr>
<td>Santa Barbara Research Center</td>
<td>80</td>
<td>80</td>
<td>100%</td>
</tr>
<tr>
<td>Santa Maria River Water Conservation District</td>
<td>2,000</td>
<td>930</td>
<td>47%</td>
</tr>
<tr>
<td>Vandenberg Air Force Base</td>
<td>5,500</td>
<td>3,404</td>
<td>62%</td>
</tr>
<tr>
<td>Total</td>
<td>39,078</td>
<td>22,149</td>
<td>57%</td>
</tr>
</tbody>
</table>

Notes:
1. Actual deliveries from the State Water Project may be substantially less than the Table A allocation to agencies, as described in the Draft 2007 State Water Project Delivery Reliability Report. For example, the draft Reliability Report estimates that deliveries could be reduced to 84% of the member agency's Table A amount as a result of various elements of uncertainty. For example, the University will need to rely on its current materials management capacity.

Comment (80):
Table 4.14-15 is not an accurate portrayal of State Water Entitlements in Santa Barbara County. The year 2005 was not typical, and to base the table on a single year skews the information greatly. See Attachment C 

09 RDEIR:
The University is currently using approximately 150 AFY (54% of available recycled water)

Comment (81):
The statement needs clarification; sentence should read 54% of contractually available recycled water.


Comment (82):
The limitations to future enrollments are based on inaccurate numbers and need to be recalculated.

Section 4.14.2.3, P. 4.14-49 Conclusion

Comment (83):
The concluding statement misinterprets the UWMP to state that District will have sufficient water supplies to meet demand from the University’s 2008 LRDP. Although sufficient infrastructure exists to convey this water, the dynamic conditions of current and future water supplies warrant more conservative estimates of water availability. It is the District’s opinion that the University must further understand and state these critical issues instead of overestimating supply and underestimating demand. As stated in the General Comment, the District believes that the University’s LRDP proposed project will have Significant and Unavoidable Class I Impacts to potable water supplies that cannot be feasibly mitigated during the planning period.
### List of Abbreviations and Acronyms

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>AF/AFY</td>
<td>Acre Feet/Acre Feet per Year</td>
</tr>
<tr>
<td>BMP</td>
<td>Best Management Practices</td>
</tr>
<tr>
<td>CCWA</td>
<td>Central Coast Water Authority</td>
</tr>
<tr>
<td>CEQA</td>
<td>California Environmental Quality Act</td>
</tr>
<tr>
<td>CII</td>
<td>Commercial, Industrial and Institutional</td>
</tr>
<tr>
<td>COMB</td>
<td>Cachuma Operations and Maintenance Board</td>
</tr>
<tr>
<td>CUWCC</td>
<td>California Urban Water Conservation Council</td>
</tr>
<tr>
<td>CVWD</td>
<td>Carpentaria Valley Water District</td>
</tr>
<tr>
<td>DWR</td>
<td>Department of Water Resources</td>
</tr>
<tr>
<td>GSD</td>
<td>Goleta Sanitary District</td>
</tr>
<tr>
<td>GW</td>
<td>Groundwater</td>
</tr>
<tr>
<td>GWD/District</td>
<td>Goleta Water District</td>
</tr>
<tr>
<td>GWMP</td>
<td>Groundwater Management Plan</td>
</tr>
<tr>
<td>HEW</td>
<td>High Efficiency Washing Machine</td>
</tr>
<tr>
<td>LRDP</td>
<td>Long Range Development Plan</td>
</tr>
<tr>
<td>RDEIR</td>
<td>Recirculated Draft Environmental Impact Report</td>
</tr>
<tr>
<td>SAFE</td>
<td>SAFE Water Supplies Ordinance</td>
</tr>
<tr>
<td>SBCFCWCD</td>
<td>Santa Barbara County Flood Control and Water Conservation District</td>
</tr>
<tr>
<td>SWP</td>
<td>State Water Project</td>
</tr>
<tr>
<td>UCSB/University</td>
<td>University of California, Santa Barbara</td>
</tr>
<tr>
<td>ULFT</td>
<td>Ultra Low Flow Toilet</td>
</tr>
<tr>
<td>UWMP</td>
<td>Urban Water Management Plan</td>
</tr>
<tr>
<td>WDF</td>
<td>Water Duty Factor</td>
</tr>
<tr>
<td>WSA</td>
<td>Water Supply Assessment</td>
</tr>
<tr>
<td>WSMP</td>
<td>Water Supply Management Plan</td>
</tr>
<tr>
<td>WTP</td>
<td>Water Treatment Plant</td>
</tr>
</tbody>
</table>
Attachment B

SAFE WATER SUPPLIES ORDINANCE

FULL TEXT OF MEASURE 911
GOLETA WATER DISTRICT
Ordinance 91-01
SAFE WATER SUPPLIES ORDINANCE

THE PEOPLE OF THE GOLETA WATER DISTRICT,
COUNTY OF SANTA BARBARA, STATE OF
CALIFORNIA, DO ORDAIN AND ENACT THE
FOLLOWING ORDINANCE, WHICH SHALL BE
KNOWN AS THE SAFE WATER SUPPLIES
ORDINANCE

RECEITALS

WHEREAS, the Goleta Water District ("District") faces a
significant shortage of water in meet current long-term
water demands of its customers as determined by the State
Department of Water Resources and the Santa Barbara
County Flood Control and Water Conservation District
in their 1983 Santa Barbara County Water Project
Alternatives study,

WHEREAS, a drought emergency was declared in Santa
Barbara County in 1981 following four years of below-
normal precipitation within Santa Barbara County and, in
the future, the District will continue to be subject to
recurring drought cycles which will threaten the ability of
the District to meet the health and safety needs of its
customers unless new and determined long term water
projects are developed and

WHEREAS, the District relies exclusively on local water
supplies to meet its water needs, obtained which supplies
are unique entirely with Santa Barbara County and which
supplies are subject to the same drought conditions;

WHEREAS, the alternative to a system serving the District's
intended water demand is to provide for the development
of a new and additional water supply connection to the
santa Barbara Channel to obtain water from the ocean;

WHEREAS, the Board of Directors of the
Goleta Water District adopted a Water Supply
Management Plan which includes reliance upon a new water
supply from both a desalination plant and the State Water Project

WHEREAS, the District is a party to an agreement with the
Santa Barbara County Flood Control and Water
Conservation District entitled "Water Supply Reimbursement
Agreement" dated December 1, 1964, which is executed
on June 26, 1984, the "WSRA", entitling the District to
4,500 acre feet per year from the State Water Project, and

NOW, THEREFORE, THE FOLLOWING ORDINANCE IS
ENACTED INTO LAW.

I. Drought Buffer

1. In each year commencing in the first year the
State Water Project makes deliveries to the District, the
District shall, after providing service to its existing
customers, commit at least 2,500 acre feet of its water
supplies (the "Annual Service Limit") in the Central
Basin to direct injection or by reduction in
groundwater pumping. The water as stored in the Central
Basin shall comprise the District's "Drought Buffer.

2. The Drought Buffer may be pumped and
distributed by the District only to existing customers, and
only in the event that a drought in the North Coast causes
a reduction in the District's annual deliveries from the
Northern California Water Project. The drought buffer water
will be used by the District to fill existing water storage,
and to meet the needs of the District's existing customers.

3. The District shall maintain the Central Basin at
a level equal to or above 1992 levels, if the District
is required to make use of the Central Basin's storage.

II. Water Supply Distribution Plan

1. The District shall be responsible for providing
new and additional water supply connections to any
property not previously served by the District until all of
the following conditions are met:

a. The District is receiving 100% of its deliveries
normally allowed from the Cachuma Project.

Goleta Water District Comments on UCSB LRDP RDEIR Page 31 of 38
b. The District has met its legal obligations required by the judgment in Wright v Goleta Water District;

c. Water running by the District is eliminated;

d. The District has met its obligation to make its Annual Storage Commitment to the Drought Buffer.

5. For each year in which the conditions of paragraph 4 have been met, the District shall be authorized to release 1/2 of its total potable water supply in new or additional connection with service connections and if such new releases are authorized, the District shall permanently increase the size of the Annual Storage Commitment made to the Drought Buffer by 2/3 of the amount of any release for new or additional uses so that safe water supplies in times of drought shall not be endangered by new or additional demands.

III State Water Supply

6. Due to controversy concerning the physical ability of the State Water Project to deliver its full contractual commitments, District shall plan for delivery of only 2,300 acre feet per year at the amount of the firm new yield from the State Water Project. Any excess water annually delivered shall be stored in the Goleta Groundwater Basin for use in drought.

7. The District shall immediately either (a) give Notice of its Intention to Request Construction of Described Project Facilities under the State Water Act, as provided for in Section 5(a)(2) of the WSRA or (b) respond to any such notice previously given by any other Contractor as provided for in Section 5(a)(2) of the WSRA that it wishes to participate in the described project.

8. The Project Facilities to be constructed pursuant to the Notice of Intention to Request Construction of Described Project Facilities shall be the Mission Hills and Santa Ynez Extensions of the Coastal Branch of the California Aqueduct and required water treatment facilities and other appurtenant facilities, herein the "Project Facilities".

9. The District agrees, pursuant to Section 5(a)(2) of the WSRA, that the time for determination of participation and siting of the Project Facilities may be any date on or after September 1, 1992 acceptable to the other participants.

10. The District shall, in the shortest time lawfully possible, exercise all of its rights and fulfill all of its obligations under the WSRA, including the payment of any monies required thereunder.

11. The District shall file a Late Request to Amend, pursuant to Section 3(f) of the Design and EIR Agreement, and agree to pay its proportionate share of all costs required by said Section 3(f) and any amounts required under Section 3(g) of said Design and EIR Agreement.

12. The District of the Santa Barbara Water Surveyors Agency, or any other joint powers agency of which the District is a member or may become a member for such purposes, may issue revenue bonds ("bonds") from time to time in an amount not to exceed Forty Two Million Dollars ($42,000,000.00) to provide funds to finance the District's pro rata share of the costs and expenses under the WSRA and the Design and EIR Agreement. Said bonds shall be used for the purposes of constructing the Project Facilities, including all limitations, any and all necessary facilities required for the delivery of State Project Water pursuant to the WSRA to the District through the Coastal Branch of the California Aqueduct, including any and all expenses incidental thereto or connected therewith, and shall include, without limitation, the cost of acquiring rights of way, the cost of constructing and/or acquiring all buildings, equipment and related personal and real property required to complete the Project Facilities and the engineering, environmental review, inspection, legal and legal agent's fees, costs incurred by the District or joint powers agencies in connection with the issuance and sale of such bonds, and reserve fund and bond interest estimated to accrue during the construction period and for a period of not to exceed twelve (12) months after completion, such bonds to be payable from the District's water revenues, to bear interest at a rate or rates not to exceed the legal maximum from time to time, and to mature in not more than forty (40) years from the date of issuance.

13. This Ordinance shall be submitted to a vote of the people of the District in compliance with the requirements of Section 5(a)(4)(f)(i) of the WSRA and pursuant to Elections Code Section 5291.

14. All actions taken pursuant to this Ordinance shall be in compliance with all local, state, and federal environmental protection laws. Nothing in the Ordinance shall be construed to require such compliance prior to the election provided for herein.

15. This Ordinance shall be liberally construed and applied in order to fully promote its underlying purposes. If any word, sentence, paragraph or section of this Ordinance is determined to be unconstitutional by a court, it is the intention of the District that the remainder of the Ordinance shall be enforced.

16. If adopted, this ordinance shall be an amendment to the Responsible Water Policy Ordinance adopted by the people in May, 1973, and may not be modified except pursuant to the vote of the electorate of the District. To the extent that the provisions of this ordinance conflict with any other ordinance or measure previously enacted by the District or the voters of the District, the provisions of this ordinance shall control. To the extent that the provisions of this Ordinance conflict with any other ordinance or measure adopted at the same election, the ordinance or measure receiving the highest number of affirmative votes shall control.

17. Nothing herein is intended to affect the rights of any parties nor the obligations of the District pursuant to the judgment in the action known as Wright v Goleta Water District, Santa Barbara Superior Court Case No. S657969.

18. This ordinance shall take effect immediately upon being approved by the majority vote of the voters cast at the election.

(Revised Water District #7-01)
FULL TEXT OF MEASURE 194
GOLETA WATER DISTRICT

AN AMENDMENT TO THE SAFE WATER
SUPPLIES ORDINANCE

THE PEOPLE OF THE GOLETA WATER DISTRICT,
COUNTY OF SANTA BARBARA, STATE OF
CALIFORNIA, DO ORDAIN AND ENACT THE
FOLLOWING ORDINANCE WHICH SHALL BE AN
AMENDMENT TO THE SAFE WATER SUPPLIES
ORDINANCE:

RECIPIALS:

WHEREAS, the waters of the Goleta Water District
(“District”) enacted the SAFE Water Supplies Ordinance
(“SAFE”) in June 1991 authorizing the participation by
the District in the State Water Project and providing for
the bond financing to develop the Project Facilities
necessary for delivery of water to the District; and

WHEREAS, the District is now a member of the Central
Coast Water Authority, the members of which are
cooperating collectively to develop the Project Facilities
which are now under construction; and

WHEREAS, SAFE provides for the creation of a Drought
Buffer of water stored in the Goleta groundwater basin to
protect against future drought emergencies and a Water
Supply Distribution Plan to protect the District’s water
supplies against new demands until deliveries from the
State Water Project are available; and

WHEREAS, this proposed amendment to SAFE maintains
all the provisions regarding the protection of water
supplies provided by the Drought Buffer and the Water
Supply Distribution Plan; and

WHEREAS, pursuant to provisions of the judgment in the
lawsuit known as Wright v Goleta Water District, the
District is required to develop a Water Plan to provide
the necessary water supplies to achieve a balance between
supply and demand for water within the District.
The District’s Water Plan is based on continuing to use the
maximum amount of water available from the Cachuma
Project; prudent management of the Goleta groundwater
basin; use of the newly constructed wastewater
reclamation project to replace existing use of potable
water for turf irrigation; a continuing water conservation
planning effort; participation in the State Water Project;
and the necessary level of commitment to a desalination
sea water project. As a result of the long-term water
supply deficit in the District, the District has been
operating under a water connection moratorium for over
twenty years. Once fully implemented, the District’s
Water Plan should provide adequate supplies to meet
long-term water demand in the District; and

WHEREAS, the forty year water service contract with the
United States Bureau of Reclamation for delivery of water
from the Cachuma Project will expire in May 1995.
Negotiations are currently under way to renew that
contract. The Bureau of Reclamation has required that the
Cachuma Project be subjected to an environmental review
process which is now being undertaken. It appears likely
that the District’s yield from the Cachuma Project after
contract renewal will be less than the current yield as a
result of the dedication of water for environmental
enhancement purposes on the lower Santa Ynez River; and

WHEREAS, the Southern California Water Company is a
Santa Barbara County water purveyor which currently
holds rights to an entitlement to 3,000 acre feet per year of
water from the State Water Project and has given notice of
its intent to sell 2,500 acre feet of that entitlement. The
Goleta Water District has identified itself as a potential
purchaser of the entitlement. It is the intent of this
Ordinance to authorize the acquisition and use of that
entitlement; and

WHEREAS, the District estimates the annual cost of the
Southern California Water Company entitlement to be
$500 per acre foot of water delivered to the District. The
entitlement acquisition is intended to reduce the long-term
costs of water to the District and its customers in that
alternative supplies that would be available and necessary
to meet the District’s long-term demand would be more
expensive than the water available from Southern
California Water Company. The District’s cost analysis of
the acquisition is available at the District office.

NOW, THEREFORE, THE FOLLOWING ORDINANCE
IS ENACTED INTO LAW:

1. The District is authorized to acquire an additional
entitlement to the State Water Project in an amount of
up to 2,500 acre feet per year, which is currently
available from the Southern California Water
Company. This entitlement will supplement the 4,500
acre feet per year authorized by the voter in originally
adopting the SAFE Water Supplies Ordinance. This
authorization shall provide for the payment of all costs
of the acquisition and use of any additional entitlement
acquired. Due to the controversy concerning the
physical ability of the State Water Project to deliver its
full contractual commitments, the District shall plan
for the delivery of 3,000 acre feet per year of water at
the amount of first average long-term yield. The
District’s total State Water Project entitlement
includes the basic entitlement of 4,500 acre feet per
year, the District’s share of the drought buffer held by
the Central Coast Water Authority, and the entitlement
acquired pursuant to this authorization. Any excess
water actually delivered over 3,000 acre feet per year
shall be stored in the Goleta groundwater Central basin until the basin is replenished to its 1972 level, for use during drought conditions.

2. Enactment of this Ordinance shall comply with all applicable law, including the California Environmental Quality Act.

3. If adopted, this Ordinance shall be an amendment to the SAFE Water Supplies Ordinance adopted by the electorate in June, 1991, which amended and superseded the Responsible Water Policy Ordinance originally adopted by the electorate in 1973. Paragraph 1 of this Ordinance shall amend and fully supersede paragraph 6 of the SAFE Water Supplies Ordinance. All other provisions of the SAFE Ordinance shall remain in full force and effect. If adopted, this Ordinance may not be modified except pursuant to a vote of the electorate of the District.

4. This Ordinance shall be liberally construed and applied in order to fully promote its underlying purposes. If any word, sentence, paragraph or section of this Ordinance is determined to be unenforceable by a court of law, it is the intention of the District that the remainder of the Ordinance shall be enforced.
Attachment C

UCSB Long Range Development Plan

Recirculated Draft EIR Sections (RDEIR)

Comments on RDEIR Section 4.14 Water

Provided to the Goleta Water District

by

Mr. Bill Brennan

Executive Director, Central Coast Water Authority (CCWA)

Overall Impression

Comment (1):
The Recirculated Draft EIR illustrates an incomplete understanding of the current issues regarding state water through the SWP. Currently, allocation of state water is at 15% and could go lower if the drought continues. The State has limited ability to move water through the Delta because of endangered species regulations, and a regulatory drought now exists in addition to the drought of the last three years. As a result, water agencies have been forced to adopt increasingly restrictive water management approaches. Water supplies as listed in this RDEIR are unrealistic, at least within the next 3-5 years, and need to reflect the reality of the current water supply conditions.

Section 4.14.1.2, P. 4.14-3 The State Water Project, Paragraph 1

09 RDEIR:
The 7,450 AFY figure includes a 450 AFY “Drought Buffer” (the District’s share of CCWA’s Drought Buffer), and 2,500 AFY of “additional” Table A allotment.

Comment (2):
Language is incorrect. The 2,500 AFY should be referred to as a “special Drought Buffer” rather than an “additional” Table A allotment. Using “Table A” implies, incorrectly, that treatment plant and pipeline capacity is available for this water.

Section 4.14.1.2, P. 4.14-3 The State Water Project, Paragraph 1

09 RDEIR:
Under the District’s agreement with CCWA, its share of the conveyance facilities that deliver SWP water to Cachuma Lake is limited to 4,5000 AFY, which is used as the District’s basic supply.

Comment (3):
Treatment facilities should be added to the sentence to read: ...its share of the treatment and conveyance facilities that deliver SWP water...
Section 4.14.1.2, P. 4.14-3 The State Water Project, Paragraph 1

Comment (4):
This paragraph needs clarification. It should be added that the Drought Buffer amounts are used for reliability purposes and do not have treatment plant or pipeline delivery capacity associated with them.

Section 4.14.1.2, P. 4.14-3 The State Water Project, Paragraph 2

09 RDEIR:
While GWD will not use its additional allotments (beyond 4,500 AFY) during normal rainfall years, this additional allotment will help offset the effect of curtailments in SWP deliveries projected by DWR for future years.

Comment (5):
The language used in this statement needs refinement; “additional allotments” should be changed to “Drought Buffer amounts” as explained in Comment (2). “Normal rainfall years” should be changed to “wet years” and “projected by DWR” should be deleted. Sentence should read: While GWD will not use its Drought Buffer amounts (beyond 4,500 AFY) during wet years, this additional allotment will help offset the effects of curtailments in SWP deliveries in the future.

Section 4.14.1.2, P. 4.14-7 Normal Years

Comment (6):
It should be added that the Goleta Water District and The Department of Water Resources do not carry the same definitions. DWR does not define “normal year”, only critical, dry, average, above average, and wet. Is the GWD definition of “normal year” consistent with DWR’s definition of “average” and “above average”? Also, it needs to be understood that while high allocations are increasingly possible in above average years, allocation is determined by the evaluation of many other variables.

Section 4.14.1.2, P. 4.14-7 Table 4.14-1

Comment (7):
Title uses poor choice of terms; “normal rainfall years” should be characterized as “normal years” as defined by GWD or in terms defined by the DWR.

Section 4.14.1.2, P. 4.14-7 Table 4.14-1

Comment (8):
The State Water Project figure does not account for the spill risk in Lake Cachuma. On average, the lake spills once every three years; GWD will not take SWP water if there is a risk of this spillage from Lake Cachuma.

Section 4.14.1.2, P. 4.14-8 Critical Dry Year, Cachuma Project

09 RDEIR:
The District also assumes that an average of 3,584 AFY of the Cachuma Surface water Buffer is available for use during a critical dry year.

Comment (9):
GWD needs to clarify if this is true, and is it true in multiple dry years, or only the first of a dry year series? Is it true that the Cachuma Surface Water Buffer of 3,584 AFY is only available once, not every year?
Section 4.14.1.2, P. 4.14-9 Table 4.14-2

Comment (10):
- Lake Cachuma Buffer is only available in the first dry year – Refer to Comment (9)

Table should read:

| Lake Cachuma Buffer | 3,584 | 0 | 0 | 0 | 0 |


Comment (11):
It should be added that the 2007 SWP Delivery Reliability Report includes estimates of the potential future reductions to SWP delivery reliability.


09 RDEIR:
The long-term average SWP delivery is projected to be about 63 percent of “Table A amounts”

Comment (12):
It needs to be understood that the long-term average is only valid if excess water can be stored. Otherwise, excess water must be sold or foregone. Lake Cachuma storage is risky if local groundwater storage is full, therefore other storage is necessary.

Section 4.14.1.2, P. 4.14-12 Dry-Year Water Programs

Comment (13):
It needs to be clarified that the DWR and/or the State Water Contractors have, in some years, operated a dry-year water program for SWP contractors. The availability of water has been very small in relation to demand. DWR has not yet announced how much water is available in the program, when it may be available or the cost.

The last paragraph quoting the WSA needs amendment. It should be stated that a water supply reliability agreement that will be a sale of surplus SLOC State Water Project water to CCWA in 2008 and 2009

The last paragraph of the section should read: as demonstrated in this chapter, development under the 2008 LRDP has not, to date, necessitated any of these backup supply options

Section 4.14.2.3, P. 4.14-44 Table 4.14-14

Comment (14):
The State Water Project figure is again overstated, until Delta isolated facilities are constructed and off-site groundwater storage is available, this figure is not a realistic supply amount for the near future.

Section 4.14.2.3, P. 4.14-46 Surface Water—The State Water Project

Comment (15):
Option 1 is completely untrue; the University may not purchase an unused allotment of SWP water from the SBCFCWCD. The CCWA is the responsible agency, as known through the 1991 Transfer of Financial Responsibility agreement with the SBCFCWCD and the Water Supply Agreements with the individual project participants. Therefore, all state water purchase agreements must first be approved by the CCWA. Regardless of the responsible agency, all 45,486 AF of state water are spoken for and no more water treatment plant or pipeline capacity exists to make this option feasible.
Option 2 needs further clarification. Although it is true that the University can acquire an unused allotment of SWP water from another CCWA member agency, the agencies must express interest in selling unused Table A allotments. To date, only the Carpentaria Valley Water District (CVWD) has expressed interest in selling, and is also in negotiations to sell the water to other customers. For planning purposes, The University should not count on option 2 unless current negotiations with CVWD are already in place.

Section 4.14.2.3, P. 4.14-46 Table 4.14-5

Comment (16):
This table is not an accurate portrayal of State Water Entitlements in Santa Barbara County. 2005 was not a typical year, and to base the table off a single year skews this information greatly.


Comment (17):
The University will only be able to obtain a restrictive amount of surplus water from the SWP if the University acquires the water with capacity rights; there must also be enough water to get through short term SWP reliability issues.
Response to Comment R-13-1. The RDEIR relies on the District’s 2008 Water Supply Assessment (WSA) adopted in connection with the City of Goleta General Plan for its projections of future demand. The WSA’s projections, in turn, are based “proposed maximum build out: of development under the relevant land use plans” (WSA p. 18). Because any population growth within the district—including growth induced by development under the LRDP—would need to be accommodated under the existing plans, the WSA’s demand estimates represent demand from the maximum available growth. Population growth induced by the LRDP would either be accommodated within the development allowed by the plans, or it would locate outside the District. Induced growth is thus already included in the WSA’s, and the RDEIR’s estimates.

Response to Comment R-13-2. Comment noted.

Response to Comment R-13-3. See Master Response - Water Supply, section V.A.

Response to Comment R-13-4. The comments regarding the Cachuma Operations Board and potential allocations in future years are noted. Regarding future available supplies from the Cachuma Project, please see Master Response - Water Supply, section IV.A. The outcome of the pending State Water Resources Control Board proceeding, or the effects of any final order in that proceeding on the amounts of future Cachuma Project deliveries, cannot be predicted at this time.

Response to Comment R-13-5. The analysis in the RDEIR relies on the 2008 WSA for its projections of future water supply from the Cachuma Project and of the District’s management of carryover water. Please see Master Response - Water Supply section IV.A. The 2008 WSA represents the most recent adopted statement of District policy on the subject.

With regard to banked groundwater, the RDEIR states at the bottom of page 4.14-16:

SAFE restricts use of this Drought Buffer to times when Cachuma deliveries are restricted. However, so long as the District maintains the Central Basin at or above 1972 water levels, SAFE allows other banked water that is not part of the Drought Buffer to be accessed by the District at any time. As of December 2007, there was a total of about 6,000 – 12,000 AF of water in storage in the Central Basin above 1972 levels. This water is available for District production at a rate of 400 AFY in addition to its annual appropriative groundwater right of 2,350 AF.

For further discussion of the SAFE Ordinance, see Master Response - Water Supply, section III.

Response to Comment R-13-6. Regarding the RDEIR’s projection of the SWP’s long-term average delivery as 4,500 AFY rather than 3,800 AFY, please see Master Response - Water Supply, section III.B. Regarding State Water Project deliveries, please see Master Response - Water Supply, section IV.B.

Response to Comment R-13-7. The RDEIR discusses the District’s pumping capacity on pages 4.14-3 and -4. This text acknowledges the limitations of the SAFE Ordinance on the District’s ability to pump its groundwater supplies, as does the text on pages 4.14-13 though 15. Please see also Master Response - Water Supply, section III.A and responses to comments R-13-10 and -20, below.

Response to Comment R-13-8. Please see response to comment R-8-31.
Response to Comment R-13-9. The RDEIR uses the information available at the time it was prepared. The two additional wells are part of the Goleta Water District’s Capital Improvement Program. The RDEIR reasonably assumes that GWD will implement this program as necessary to meet future demands.

Response to Comment R-13-10. Page 4.14-4 of the RDEIR has been amended as follows (emphasis added):

The District’s ability to draw this water out of the groundwater basin is limited by the SAFE Ordinance. As explained in more detail below, if the basin’s water storage falls below its 1972 levels, then the District must leave its Wright Judgment entitlement in the basin. As long as the basin holds water at a level above the level it held in 1972, then in normal years the District must maintain a 2,000 AF buffer above 1972 levels but otherwise may use the water in the annual amounts described above. In the WSA, the District estimates that there are 6,000-12,000 AF above the 1972 level available in the basin for normal years; the 2,350 AFY of Wright Judgment water is therefore available to meet District demand. In dry years when deliveries from the Cachuma Project are reduced, the District may draw on the drought buffer. If the basin falls below the 1972 level, then in normal years, the District may use only use its Wright Judgment entitlement; banked water is available only in dry years.

Response to Comment R-13-11. The EIR used the adopted 2005 UWMP for relevant background information, as that document was the official public source of information regarding the District’s water supplies. The recently-adopted Groundwater Management Plan confirms its estimates of available storage at page 4-10.

Response to Comment R-13-12. The commenter’s objection to the term “banked” water is noted.

Regarding the District’s ability to pump stored or banked water at the rate of 400 AFY into the future, please see Master Response - Water Supply, section III.A.

Response to Comment R-13-13. Page 4.14-4 of the RDEIR has been amended as described in response to comment R-13-10, above.

Response to Comment R-13-14. Please see Master Response - Water Supply, section III.D, regarding the District’s right to its Wright Judgment water when the groundwater basin falls below 1972 levels. As discussed in Master Response - Water Supply, section III.A, the RDEIR reasonably concludes that the groundwater basin will remain above 1972 levels.

Response to Comment R-13-15. Please see Master Response - Water Supply, section V.A.

Response to Comment R-13-16. Each of the commenter’s objections and proposed changes is based on a previous comment. Regarding delivery projections for the Cachuma Project, please see Master Response - Water Supply, section IV.A. Regarding delivery projections for the State Water Project, please see Master Response - Water Supply, section IV.B. Regarding production projections for groundwater-conjunctive use, please see Master Response - Water Supply, sections III.A and D. Regarding production projections for recycled water, please see Master Response - Water Supply, section V.A. Regarding the estimation of system losses, please see Master Response - Water Supply, section IV.C.

Response to Comment R-13-17. Please see Master Response - Water Supply, section IV.A.

Response to Comment R-13-18. Please see Master Response - Water Supply, section III.D. The RDEIR relies on the 2008 WSA’s interpretation of SAFE as it applies to the use of “stored” groundwater. See 2008
WSA, p. 11. The reference to 41,000 AF on RDEIR page 4.14-8 is to the total amount of groundwater in storage.

Response to Comment R-13-19. Please see Master Response - Water Supply, section III.D.

Response to Comment R-13-20. Please see Master Response - Water Supply, section III.D concerning the SAFE Ordinance’s limitations on groundwater use.

As discussed on pages 4.14-3 and 4 of the RDEIR, the District’s pumping capacity exceeds the amount of groundwater that SAFE authorizes it to produce. Pumping capacity is this unlikely to limit groundwater availability.

Response to Comment R-13-21. The comment recommends several changes to Table 4.14-2, which lists water supplies available to the Goleta Water District in a critical dry year.

The comment regarding the Cachuma Project is noted.

Regarding Groundwater/Conjunctive Use, please see Master Response - Water Supply, section III.A.

Regarding the SAFE Groundwater Buffer, please see Master Response - Water Supply, section III.D.

Regarding the Cachuma Project Buffer, please see Master Response - Water Supply, section IV.A.

Regarding recycled water, please see Master Response - Water Supply, section V.A.

Response to Comment R-13-22. Please see Master Response - Water Supply, section IV.A.

Response to Comment R-13-23. RDEIR page 4.14-10, 11 has been revised as follows:

In years four through six, when deliveries from the Cachuma Project are reduced, the District would draw on groundwater to extent allowed by SAFE’s Drought Buffer requirements within the constraints of available groundwater pumping capacity.

Response to Comment R-13-24. Please see Master Response - Water Supply, section V.D.

Response to Comment R-13-25. The comment recommends several changes to Table 4.14-3, which lists water supplies available to the Goleta Water District in multiple dry years.

Regarding the Cachuma Project, the RDEIR’s projection of Cachuma Project deliveries is taken directly from Table 3.4 of the 2008 WSA. Please see Master Response - Water Supply, section IV.A.

Regarding, the State Water Project, please see Master Response - Water Supply, section IV.B.

Regarding the annual groundwater pumping right, the RDEIR’s projections are taken directly from Table 3.4 of the 2008 WSA. Please see Master Response - Water Supply, section III.D.

Regarding groundwater /conjunctive use, please see Master Response - Water Supply, sections III.A and D.

Regarding groundwater above 1972 water levels, please see Master Response - Water Supply, section III.D.
Regarding the SAFE Ordinance groundwater buffer, please see Master Response - Water Supply, section III.D. Table 4.14-3 of the RDEIR projects that in multiple dry years groundwater sources (from the District’s annual pumping rights, from conjunctive use, from water stored above 1972 levels, and from the Drought Buffer) together could provide 4,200 AFY, or about 1,200 AFY less than the amount stated for Years 4-6 in the proposed revision to Table 4.14-3 District’s comment letter, and 2,500 AFY less than the amount that would be produced if the two additional wells were brought on line, as noted in the footnote to the District’s proposed table.

Regarding the Cachuma surface water buffer, please see Master Response - Water Supply, section IV.A.

Regarding recycled water production, please see Master Response - Water Supply, section IV.A.

Regarding unaccounted-for losses, please see Master Response - Water Supply, section III.C.

Response to Comment R-13-26. Please see Master Response - Water Supply, section IV.B.

Response to Comment R-13-27. The occurrence, magnitudes and potential effects of future weather events cannot be predicted at this time with the accuracy required to assist in projecting future water supply. It therefore is appropriate to base the EIR’s water supply analysis on the best available information, which is historical hydrology data.

Response to Comment R-13-28. The RDEIR’s reference to the potential use of conjunctive use program in adapting to future hydrological regimes is a direct quotation from pages 5 and 6 of the 2008 WSA. Please see Master Response - Water Supply, section I regarding the RDEIR’s reliance on the 2008 WSA.

Response to Comment R-13-29. Please see Master Response - Water Supply, section IV.A.

Response to Comment #30. The sentence on RDEIR page 4.14-14 has been revised as follows:

First, SAFE limits the water available for new service connections to 1 percent of the District’s yearly supply. First, SAFE limits the water available for new service connections to a maximum of 1% of the District’s potable supply.

Response to Comment R-13-31. See Master Response - Water Supply, section III.C.

Response to Comment R-13-32. See Master Response - Water Supply, section III.C.

Response to Comment R-13-33. Regarding Cachuma Project deliveries, please see Master Response - Water Supply, section IV.A. Regarding the State Water Project, please see Master Response - Water Supply, sections III.B and IV.B. Regarding the 1% allocation for new connections, please see Master Response - Water Supply, section III.C. Regarding the Lake Cachuma Surface Water Buffer, please see Master Response - Water Supply, section IV.A. Regarding conjunctive use, please see Master Response - Water Supply, section III.D.

Response to Comment R-13-34. Please see Master Response - Water Supply, section III.D.

Response to Comment R-13-35. Please see Master Response - Water Supply, sections III.A III.D.

Response to Comment R-13-36. In response to this comment, Figure 4.14-2 has been deleted. Regarding the District’s ability to pump its Wright Judgment entitlement when the groundwater basin is below 1072 levels, please see response to comment Master Response – Water Supply section III.D.
Response to Comment R-13-37. Please see Master Response - Water Supply, section V.A.

Response to Comment R-13-38. Regarding recycled water, please see Master Response - Water Supply, section V.A. Regarding unaccounted-for losses, please see Master Response - Water Supply, section IV.C.

Response to Comment R-13-39. The following text has been added to EIR page 4.14-23:

The above BMPs were reorganized and amended on September 16, 2009 and are available here: http://www.cuwcc.org/bmps.aspx?ekmensel=b86195de_24_0_7794_7

Response to Comment R-13-40. Please see Master Response - Water Supply, section III.C.

Response to Comment R-13-41. The text for BMP 5 will be supplemented with the following:

The District has partnered with both the City and County of Santa Barbara to implement voluntary water budgets for landscape irrigation meters serving large landscapes through www.landscapebudgets.com. Currently, approximately 120 landscape accounts are signed up. Up until 2009, the program has been paid for through a grant obtained by the Santa Barbara County Water Agency, which has now ended. The District is currently exploring the option of sending information to customers once per month instead of participating in the www.landscapebudgets.com program.

Response to Comment R-13-42. The text for BMP 6 will be supplemented with the following:

The District offers High Efficiency Washing Machine (HEW) rebates to residential customers through the Smart Rebates program, administered by the California Urban Water Conservation Council (CUWCC) and partially funded through a grant from the DWR. The DWR funding is on hold at this time due to State budget constraints; it is estimated that District rebates are expended for this year. There is currently a CII rebate program in effect through the lead agency of Santa Barbara County. Over time, the rebate amounts have increased and the CII rebate program is now $350. The program was partially funded with a grant from DWR, which is also on hold at this time.

Response to Comment R-13-43. The text for BMP# 7 will be revised as follows:

The Goleta Water District currently maintains an active public information program to promote and educate customers about water conservation. District staff provides conservation materials at several public events throughout the year such as the Lemon Festival, and Earth Day. and the Sustainable Landscape Fair.

Response to Comment R-13-44. Comment noted.

Response to Comment R-13-45. The text for BMP #11 will be revised as follows:

BMP 11: CONSERVATION PRICING. The District currently implements conservation pricing in that all water is sold at a uniform volumetric rate. The District currently implements conservation pricing in that all water is sold at a uniform volumetric rate. In addition, volumetric rates are deemed sufficiently consistent with the definition of conservation pricing because the total annual revenue from the volumetric rates is greater than 70% of the total revenue for the District. Some members of the District’s Citizen’s Rate Committee have commented that the existing rate structure was water conserving. To improve upon this BMP, the District is currently conducting a rate study to determine if it would be feasible to implement an increasing block volumetric rate in the future.
Response to Comment R-13-46. The text for BMP #12 will be revised as follows:

BMP 12: CONSERVATION COORDINATOR. The District has implemented this BMP by designating a full-time Conservation Coordinator for the District. Due to budgeting constraints and decreased staffing levels, the Conservation Coordinator is not a full-time position at this time.

Response to Comment R-13-47. The text for BMP #14 will be revised as follows:

BMP 14: RESIDENTIAL ULFT REPLACEMENT PROGRAMS. During the drought from 1988 to 1992, the Goleta Water District implemented a $2 million ULFT rebate and distribution program and has completed implementation for this BMP. The District currently offers ultra low flow toilet (ULFT) and HEW rebates through the Smart Rebates Program, administered by the CUWCC and partially funded through a grant from DWR. The DWR funding is on hold at this time, and District rebates are estimated to be expended for this year.


Response to Comment R-13-49. The text will be revised as follows:

Goleta Water District. The Goleta Water District is responsible for meeting federal and state regulations regarding water supply and water quality. Such regulations include water supply treatment system testing and monitoring, as specified in Title 23, Division 4, Chapter 1, Article 4 of the CCR, and federal regulations promulgated by the EPA. GWD also implements the SAFE ordinance discussed above.

Response to Comment R-13-50. GWD is included in the list of responsible agencies on DEIR page 1.0-8.


Response to Comment R-13-52. As explained in the following excerpt from RDEIR Appendix 4.14-1 (page 1), the University is not subject to the requirements of Water Code Section 10910:

“The 2008 LRDP meets the definition of a “project” under a number of the criteria listed above and is subject to review under the California Environmental Quality Act. However, as written, the statute applies only to cities and counties. Nevertheless, this Appendix to the LRDP EIR has been prepared in accordance with the requirements of Section 10910 of the California Water Code, and is intended to serve as the functional equivalent of a water supply assessment for the 2008 LRDP Update.”

For purposes of aiding the analysis in the EIR, however, the University prepared Appendix 4.14-1, which provides the functional equivalent of the analysis required for cities and counties by Section 10910.

Response to Comment R-13-53. The standards of significance used in the EIR are consistent with CEQA Guidelines, Appendix G, §§ VII.b), XVI.b) and XVI.d). Section 4.14.2.2 applies these standards, and identifies mitigation measures that would reduce the impact of the proposed 2008 LRDP on water supplies (LRDP Impact W-3) to a less-than-significant level.

Response to Comment R-13-54. Please see Master Response - Water Supply, section V.B.

Response to Comment R-13-55. Please see Master Response - Water Supply, section V.B.

Response to Comment R-13-56. The comment recommends several changes to Table 4.14-9, which provides a summary of water demand associated with development accommodated by the 2008 LRDP.
Housing. Please see Master Response - Water Supply, section V.B.

Instruction, Research and Other. As explained in Master Response - Water Supply section V.B, the water duty factor for institutional, research, and other uses (0.184 AFY per 1,000 square feet) was based on the future estimated average of water use of different functional areas proposed by the LRDP. The composition of these uses would be different from the existing non-residential uses that were the subject of the 2004 Infrastructure Assessment Report uses. Rather than rely on a water duty factor for existing uses, the RDEIR calculated a new water duty factor that corresponds to the uses that will actually be developed under the LRDP.

Moreover, it should be noted that the RDEIR applies this water duty factor to an overestimate of total assignable square feet (1,900,000 ASF versus 1,775,700 ASF), thereby overestimating the water demand associated with non-residential uses.

Future Water Demand. Please see Master Response - Water Supply, section V.C regarding demand and the appropriate baseline for the RDEIR’s water supply analysis. The additional demand due to the proposed 2008 LRDP (above and beyond the current use and demand due to approved projects of 872 AFY, which is discussed on RDEIR page 4.14-23) is 856 AFY and is shown in RDEIR Table 4.14-9, page 4.14-31. Hence, the total water demand for the Campus at buildout of the 2008 LRDP is projected to be 872 AFY + 856 AFY = 1,728 AFY.

The commenter proposes adding 256 AFY to current use, to represent recently completed or approved buildings. This demand is already accounted for in the 872 AFY figure used for current demand in the RDEIR.

Response to Comment R-13-57. Water Duty Factors. The data used was the most recent available at the time of EIR preparation and reflects the most accurate information available. As noted on RDEIR page 4.14-30, the EIR uses a water duty factor of 0.152 AFY per unit, which is higher than the more recently observed water usage during 2005/2006 (0.148 AFY per unit).

Faculty Housing. Table 4.10-10 represents an average water demand usage across the different residential housing types on campus. It includes student family housing (Storke Apartments and West Campus Apartments), which are largely occupied year-round, and have similar characteristics to faculty/staff housing. The campus water demand factors also take into account the Campus housing’s rate of recycled water usage, which is higher than in other areas of the community.

Response to Comment R-13-58. Please see Master Response - Water Supply, section III.D.

Response to Comment R-13-59. The RDEIR’s treatment of critical dry years is the same as that in the 2008 WSA. Please see Master Response - Water Supply, section III.D.

Response to Comment R-13-60. Please see Master Response - Water Supply, section VI.C.1.

It should be noted that this requested change is consistent with the District’s 2008 WSA and 2005 UWMP, which encourage and contemplate increased use of recycled water.

Response to Comment R-13-61. Mitigation W-3B has been revised as follows:

LRDP Mitigation W-3B: Individually meter and/or sub-meter all new and existing UCSB living units or buildings and institute water charges on a per unit
basis with a graduated fee structure that is revenue neutral to the University.

Response to Comment R-13-62. Mitigation W-3C has been revised as follows:

**LRDP Mitigation W-3C:** The University shall install water saving devices in all buildings and facilities, new or existing that do not currently have them, and shall continue to use existing water saving devices. The water saving devices that will be installed shall include, but will not be limited to, the following: shower heads, toilets, urinals, washing machines, dishwashers, hot water recirculation systems, and irrigation systems.

Response to Comment R-13-63. Please see Master Response - Water Supply, section VI.A.

Response to Comment R-13-64. Mitigation Measure W-3G’s 50 AFY trigger for the available supply for areas subject to the 1991 Water Reclamation Agreement was developed and is appropriate because the analysis in RDEIR section 4.14 calculates the estimated future demands for these areas (the Main Campus, Storke Campus and West Campus) separately from the estimated future demands for other LRDP areas. (See RDEIR Appendix 4.14, pp. 4.14-25 to 4.14-28.) Contrary to the suggestion in this comment, the University’s rights under the 1991 Reclamation Agreement or Permit 14 are not used in the analyses in RDEIR section 4.14; Please see Master Response - Water Supply, section V.D for further discussion of this subject.


Response to Comment R-13-66.

**Total Supply.** Please see response to comment R-13-16.

**Additional Demand from LRDP.** Please see response to comment R-13-56.

**Recycled/Potable Water Offset.** Please see Master Response - Water Supply, section V.A.

**Unaccounted for Losses.** Please see Master Response – Water Supply, section IV.C.

Response to Comment R-13-67. Regarding the annual allocation for new water connections, please see Master Response - Water Supply, section III.C. Regarding the RDEIR’s estimate of existing demand, including demand from approved but not completed construction, please see Master Response - Water Supply, section V.C.

Response to Comment R-13-68. Please see responses to comments R-13-30 through -32.

Response to Comment R-13-69. **Total Supply.** Please see response to comment R-13-16.

2008 LRDP. Please see Master Response - Water Supply, section V.C.

**Recycled Water.** Please see Master Response - Water Supply, section V.A.

**Note (1).** The statement in Note is adapted from Note B to WSA Table 5.2. Please see Master Response - Water Supply, section III.
 Dry Year Surcharge. The RDEIR relies on Table 5.2 of the District’s 2008 WSA, which includes a Dry Year Surcharge row, but states in Note (c) that a demand reduction program would eliminate the surcharge. Please see Master Response - Water Supply, section I. Footnote 2 of Table 4.14-12 has been amended to read as follows:

2. Assumes demand in critical dry years is 107% of normal year demand. Increased demand is assumed not to occur in the years shown because the District in year four of an extended drought will be implementing demand reduction measures. A Dry Year Surcharge accounts for increased water usage in dry years. This table assumes no such surcharge in a critical dry year because the District would implement a demand reduction program.

It should be noted that even if the surcharge were applied in a critical dry year, supply would still meet cumulative demand in each year. Applying a 7% surcharge to the total customer demand for each year in Table 4.14-12 yields additional demand that is still less than that year’s surplus:

<table>
<thead>
<tr>
<th>Year</th>
<th>Total Customer Demand</th>
<th>7% Dry Year Surcharge</th>
<th>Surplus in Table 4.14-12</th>
<th>Surplus with Surcharge Applied</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010</td>
<td>13,237</td>
<td>927</td>
<td>1,223</td>
<td>296</td>
</tr>
<tr>
<td>2015</td>
<td>13,898</td>
<td>973</td>
<td>1,922</td>
<td>949</td>
</tr>
<tr>
<td>2020</td>
<td>14,561</td>
<td>1,019</td>
<td>2,769</td>
<td>1777</td>
</tr>
<tr>
<td>2025</td>
<td>15,261</td>
<td>1,068</td>
<td>2,277</td>
<td>1209</td>
</tr>
<tr>
<td>2030</td>
<td>15,698</td>
<td>1,098</td>
<td>2,064</td>
<td>966</td>
</tr>
</tbody>
</table>

Response to Comment R-13-70. Please see Master Response - Water Supply, section III.D.

Response to Comment R-13-71. Cachuma Project. Please see Master Response - Water Supply, section IV.A.

State Water Project. Please see Master Response - Water Supply, section IV.B.

Annual Groundwater Rights. Please see Master Response - Water Supply, section III.D.

Groundwater Conjunctive Use. Please see Master Response - Water Supply, section III.A.

Groundwater Above 1972 Levels. Please see Master Response - Water Supply, section III.D.

SAFE Groundwater Drought Buffer. Comment noted.

Lake Cachuma Surface Water Buffer. Please see Master Response - Water Supply, section IV.A.

2008 LRDP Demand. Please see Master Response - Water Supply, section V.C.

Unaccounted for Losses. Please see Master Response - Water Supply, section IV.C.

Recycled/Potable Water Offset. Please see Master Response - Water Supply, section V.A.

Response to Comment R-13-72. Please see Master Response - Water Supply, section V.A.

Response to Comment R-13-73. Please see Master Response - Water Supply, section V.A.
Response to Comment R-13-74. This comment appears to rely upon other comments questioning the RDEIR’s supply and demand figures. Please see Master Response – Water Supply, section II, regarding the RDEIR’s conclusions.

Response to Comment R-13-75. The comment recommends a number of changes to Table 4.14-14.

Lake Cachuma Supply. Please see Master Response - Water Supply, section IV.A.

State Water Project. Please see Master Response - Water Supply, section IV.B.

Groundwater Conjunctive Use. Please see Master Response - Water Supply, sections III.A and D.

Unaccounted for Losses. Please see Master Response - Water Supply, section IV.C.

Recycled Water. Please see Master Response - Water Supply, section V.A.

LRDP Demand. Please see Master Response - Water Supply, section V.C.

Response to Comment R-13-76. Please see Master Response - Water Supply, section III.C.

Response to Comment R-13-77. Please see Master Response - Water Supply, section VI.B.

Response to Comment R-13-78. The RDEIR, relying on the 2008 WSA, concludes that the District possesses sufficient supplies to serve buildout of the 2008 LRDP along with other development anticipated within the District. Because the 2008 WSA assumes the expansion of recycled water use to offset potable demand, and because there is uncertainty regarding the timing of that expansion, the RDEIR also conservatively calculates future cumulative supply and demand without any increased contribution of recycled water (see RDEIR Table 4.14-14). This analysis concludes that if recycled water does not offset demand as projected in the 2008 WSA, demand will exceed supply by up to 17 AFY in the five years following 2025, the time horizon of the LRDP, unless further supplies are acquired. Mitigation Measure W-3F, concerning the potential acquisition of additional water, including unused water from the State Water Project, is provided in that context. Please see Master Response - Water Supply, section VI.B regarding the feasibility of this measure.

Response to Comment R-13-79. Please see response to comment R-13-78 regarding the need for additional water supplies. Please see Master Response - Water Supply, section VI.B regarding the feasibility of acquiring such supplies.

Response to Comment R-13-80. RDEIR Table 4.14-15, footnote 1, states:

“Actual deliveries from the State Water Project may be substantially less than the Table ‘A’ allocation to member agencies, as described in the Draft 2007 State Water Project Delivery Reliability Report. For example, the draft Reliability Report estimates that deliveries could be reduced to 34% of the member agency’s Table A amount as a result of various elements of uncertainty.”

Please also see Response R-13C-16.

Response to Comment R-13-81. The sentence has been revised as follows:

Of the 280 AFY of recycled water available, the University is currently using approximately 150 AFY (54% of contractually available recycled water). Using the full contractual amount would provide an
additional 130 AFY. Playfields and landscaping built under the 2008 LRDP would be irrigated with recycled water.

**Response to Comment R-13-82.** The comment states that proposed limits on future enrollment to save water, as necessary, are based on inaccurate numbers, but provides no explanation for why the numbers are inaccurate. The University’s estimated water savings by enrollment are based on estimated future water demand created by the 2008 LRDP divided by the number of new students that could be accommodated by the 2008 LRDP. Please see Master Response - Water Supply, section V.C.

**Response to Comment R-13-83.** The University disagrees that the proposed 2008 LRDP will have a significant and unavoidable impact on water supplies. Please see Master Response - Water Supply, section II.
To Whom It May Concern:

I would like to comment as a parent of a child attending IV School and as a member of the IV PTA on issues related to the "Safe Routes to School" (SR2S) Program. At the present time there are no paved sidewalks from the Storke Family Student-Apartments to IV School, only a bikepath. In addition, the recent four-lane addition to El Colegio Road stops at the entrance to the Santa Ynez apartments. The remaining section yet to be constructed does not contain a sidewalk. At the present time, most students ride from Santa Catalina to the main campus posing a serious safe hazard to children walking to IV School on the northside of El Colegio.

What are the plans for providing "Safe Routes" to IV School?

Larry Parsons
Response to Comment R-14-1. Please see response to comment R-10-2. Isla Vista Elementary School is not within the jurisdiction of the University.
-----Original Message-----
From: parsons319@cox.net [mailto:parsons319@cox.net]
Sent: Monday, March 30, 2009 11:39 AM
To: info@ucsbvision2025.com
Subject: LRDP-Comments

To Whom It May Concern:

As President of the Storke Ranch Home Owners Association, I would like to
comment on the proposed extension of Phelps Road from Storke Road to Los
Carneros. The revised LRDP contained a proposed mitigation that if El
Colegio was completed from Santa Yenz apartment to Storke Road, the extension
of Phelps Road would not be necessary. Since it was stated during the last
LRDP meeting at Santa Catalina that the completion of El Colegio will occur
as a Phase II project in the near future it seems that the extension of
Phelps Road will now not be required. This is very good news for all Storke
Ranch residents!

The Storke Ranch Project includes the low income housing on the northside of
Phelps Road. All residences of the low income housing project have complete
access to the amenities of Storke ranch including three pools, two Jacuzzis,
a workout room and numerous playgrounds. Children are constantly crossing
Phelps road to enjoy the use of the facilities. Traffic from less than
thirty cars per day to in excess of 7,000 vehicles per day would have
presented an extreme safety hazard.

Again, thank you for your plans to eliminate the extension of Phelps Road as
a part of your LRDP.

Larry Parsons
President, Storke Ranch Home Owners Association
Letter R-15
Larry Parsons
Storke Ranch Home Owner's Association
3/30/2009

Response to Comment R-15-1. Please see Master Response - Phelps/Mesa Connection.
A GRATEFUL PART OF THE UCSB COMMUNITY SINCE 1982

I have lived near UCSB ever since arriving for graduate school in the Physics department in 1982. UCSB has offered many opportunities to me over all of these years. Hardly a week goes by without me attending a seminar, a lecture a film or a dance on campus.

GROWTH IS NOT A BENEFIT

In contrast to these substantive benefits, UCSB has seen growth itself as a benefit. When I ran for Goleta City Council in 2001, a member of the University staff was eager to meet with me to let me know that UCSB wanted to grow. As if any local leader would automatically see this as a benefit.

At that time I explained that Goleta and Santa Barbara have a severe jobs-housing imbalance. That more jobs and more students would make this worse, not better. And that more of what was a good thing would not any longer be a good thing.

SUSTAINABILITY: OPPORTUNITY LOST

At this time I was Chair of the Sierra Club – Santa Barbara Group. The Sierra Club is very concerned about local and global impacts of resource consumption. And one of the largest consumers of resources is private automobile use. Not just oil and metal but land.

We noted that while UCSB students are likely to use sustainable transportation, staff were much less likely to do so and faculty almost never did. It soon became clear why: Incentives and disincentives.

In particular, students were given free bus passes as an incentive to use transit instead of driving. Staff and faculty were not.

But a faculty member friend gave a very interesting insight beyond that. She lived in faculty housing and rode her bicycle to campus each day. Until one quarter when she needed to drive on campus twice a week to bring equipment with her. She discovered that it cost less for her to buy an unlimited parking permit than it was to pay for parking twice a week.

And she discovered something else: Once she had the unlimited parking permit, she found herself driving every day. It seemed a waste not to, once she had paid for it.

I brainstormed with the campus sustainable transportation official. We came up with a plan, which I will attach. We were allowed to present it to the Chancellor’s special committee on parking.

It was considered carefully. Policy changes were made. At the time we presented, if a person drove nine days a month, it was cheaper to buy an unlimited permit. After the policy changes, it
was cheaper to buy a parking permit if a person drove on campus four days a month. Yes, the situation was made twice as bad as before.

Here was a case where UCSB could take a leadership role in giving incentives to reduce driving alone to campus. It would be win-win-win: Good for the environment and the community. Good for UCSB not to have to build new parking structures at great expense. And good for those who do drive on campus because it would keep parking demand down, freeing up spaces and keeping costs down.

Yet it was a path not taken.

PAST GROWTH HAS CAUSED HARM – PAST PROMISES HAVE BEEN UNFULFILLED

In the 27 years since I have been here, UCSB has grown. Roads and intersections have been widened. Yet no new bikeways have been developed. Some were even closed since I came here. Some MTD services like the MTD bike shuttle were ended because UCSB did not support their continuation.

UCSB teaches Environmental Studies. And yet the greatest environmental study of all would be to set an example of a better way. While some token measures have been taken, little of substance has been done.

At the recent LRDP workshop, the Transportation consultant offered widened roads and intersections as “mitigation” for planned growth. It never even occurred to this paid consultant who had worked on this for three years that wider roads and intersections are a degradation of service for pedestrians and cyclists. A degradation that itself needs to be mitigated.

It was also explained at the workshop that the State is asking all campuses to grow. Well, a growth of UCLA in a city of millions has a different impact than a growth of UCSB in a city of tens of thousands. We are absolutely up against resource limits here.

KEY POINTS

I would like to offer these key points:

1) That UCSB must first mitigate their past impacts before causing new ones.
2) That UCSB lead the way in environmental sustainability, not use these words as a way to jam growth in first and "mitigate" with talk and no action.
3) That any expansion must be mitigated before the growth occurs. For example, in their current plans, student enrollment would lead housing construction by four years. Housing must be built before enrollment increases.
4) UCSB’s transportation plans are mid-20th century plans centered on accommodating private motor vehicles. UCSB must lead the way with providing incentives. And providing facilities for bicyclists, pedestrians and transit. Starting with bike/ped freeway crossings to bypass the over-widened and hostile crossings that have been created so far.
5) That UCSB cannot use up all remaining resources in the area or else no other development, housing or jobs will ever be possible.
6) At the workshop it was stated that money would be tight for mitigations. That defies basic logic. Money cannot be tight for mitigations. If money is tight, it should be cut from the growth, not from the mitigations. If you can’t handle the growth, don’t create it.
7) The greatest education UCSB could provide the community and the world would be to create a model of true sustainability for the future. That should be the heart of Long Range Development.

Sincerely,

Robert Bernstein
Win-Win Proposal for Campus Parking and Transportation

The Problem:
Current pricing for parking is too high for occasional daily users while the permit price is relatively low. If an employee needs to drive even 1/3 of the time, it is cheaper to buy a permit than to pay for the occasional use.

And, once an employee has an unlimited-use permit, there is no incentive to refrain from driving on other days. One professor told me she used to bicycle every day from Faculty Housing. Then, she needed to drive to campus for just one class to bring equipment. It was cheaper to buy the permit than to pay for just the days she drove. Once she had the permit, she found herself driving every day, “Because I had already paid for it.”

The current Transportation Alternative Program targets people who already use transportation alternatives regularly and gives them free permits to drive. This actually can encourage more driving, not less.

It is the person who usually drives to campus who needs to be targeted with incentives not to drive.

The Solution:
Provide a parking pricing system which is revenue-neutral (no increase in fees for current people who drive) yet which allows every person to save money every single time they refrain from driving. Every day an employee heads out to UCSB, they should have the opportunity to think, “Hey, if I take the bus or ride a bike to campus, I can save money! Save money and help the planet and the community at the same time!”

The Details of the Solution:
Some ideas that have been offered already:

1) A transponder system exactly like that used on many roads already. This allows fees to be charged only for the actual time used, while avoiding the need for stopping at a gate.

2) In-vehicle parking meters. A system in use at other large institutions to accomplish a similar goal.

3) “Bingo Card” type permits that allow a certain number of uses per card.

The details are easy, once there is an understanding of the concept.

The Concept:
Pay for the parking you use. Be rewarded for reducing the need for parking.

If we reduce the need for parking, we can avoid the need to build more expensive lots and that keeps the price down for those who do drive.

One other change is needed: To give the Transportation Alternatives office at UCSB the independent authority to provide transportation alternatives. Currently, this office is underneath Parking Services! Changing this hierarchy will be important to promoting creative win-win alternatives instead of getting stuck in the rut of old habits.

With small changes to the pricing system for parking at UCSB, we have a Win-Win opportunity. We can provide adequate parking for those who drive, we can provide a reward to those who refrain from driving, and we can be kinder to the planet and to the local community by reducing traffic. We also can avoid the need to build lots on open space, perhaps the biggest environmental benefit of all.

Best wishes,
Robert Bernstein
Chair - Sierra Club - Santa Barbara Group
alist@swt.org
805-685-1283
Response to Comment R-16-1. A “significant effect on the environment” (i.e., significant impact) is defined in State CEQA Guidelines Section 15382 as a substantial adverse change in the existing physical conditions within the affected area. Accordingly, feasible mitigation is applied to significant impacts caused by the proposed project when compared to the existing physical conditions (CEQA Guidelines Section 15125), not to past physical conditions.

Response to Comment R-16-2. The LRDP contains many policies that encourage sustainable use of resources as part of accommodating campus activities, growth and development.

Response to Comment R-16-3. Please see response to comment A-12-1 and Master Response - Housing and Population.

Response to Comment R-16-4. RDEIR Mitigation Measures TRAFFIC-7 and TRAFFIC-8 commit the University to working toward improving bicycle and pedestrian circulation and transit services, respectively. Because Impacts TRAFFIC-7 and TRAFFIC-8 are less than significant, no further mitigation is required.

Response to Comment R-16-5. This EIR demonstrates that with mitigation, existing resources and infrastructure can accommodate the growth proposed under the 2010 LRDP.

Response to Comment R-16-6. CEQA requires the University to adopt and implement feasible mitigation measures to reduce or avoid the LRDP’s potentially significant effects on the environment. The DEIR and RDEIR identify all appropriate and feasible mitigation, which is summarized in Section 2.0, Summary.

Response to Comment R-16-7. Please see response to comment R-16-2.

Response to Comment R-16-8. Please see response to comment R-4-19. The University does not provide free parking on campus.
From: Ian Thomson [mailto:ianthomson@cox.net]
Sent: Monday, March 30, 2009 9:29 AM
To: info@UCSBVision2025.com
Cc: jamesn@bartlein.com
Subject: Totally wrong, ill conceived plan.
Importance: High

The whole of UCSB’s Long Range Development Plan is a total nonsense and should be scrapped immediately for one very simple reason........There is no money neither now nor in the future to fund it! The county is bust, the state is bust and the country is bust and all 3 look as though they are going to be bust for the next 25 plus years due to the cash they are burning, have borrowed, are borrowing and the interest they have committed to pay on these borrowings.

UCSB does not pay any property tax because we, the tax payers, would need to give them the money in the 1st place to get it (less no doubt a 10% administration cost) back. So all the infrastructure and running costs thereof (water, sewage, roads, police, fire etc etc) is and will continue to be borne by the tax payer.

Presently ALL schools from kindergarten through to higher education establishments in California are laying off staff and turning away well qualified students because there is no cash to fund them. Why aren’t the funds presently being used on this stupid plan given to existing educational establishments who have the facilities to educate now rather than be wasted on the UCSB’s Long Range Development Plan?

At the end of the day, if this ill laid plan does go ahead, the proceeds (the increased student and support staff numbers) will only feed the egos of a few academics and support a few bars and shops in State Street at the expense of the tax payer.

Regards
John H Thomson
6895 Meadowlance Court,
Goleta
CA93117
805 845 8227
Letter R-17
John Thomson

3/30/2009

Response to Comment R-17-1. Comments noted.
March 30, 2009

Tye Simpson, Director
Campus Planning and Design
Facilities Management e/o Vision 2025
University of California at Santa Barbara
Santa Barbara, CA 93106-1030

Subject: University of California at Santa Barbara Long Range Development Plan 2008 Recirculated Draft Environmental Impact Report -

Dear Mr. Simpson:

Thank you for the opportunity to review the University of California at Santa Barbara long-range Development Plan (LRDP) 2008 recirculated Draft Environmental Impact Report (DEIR). These comments will focus on the Transportation / Traffic section of the re-circulated document. They are intended to complement the Department’s previous correspondence related to the LRDP DEIR.

1. **Study Locations/Segments/Intersections** - The U.S. 101 segment from SR 217 to SR 154. As mentioned in the Department’s previous comments, this freeway segment should be included in the regional analysis of the EIR.

2. **Bicycles and Pedestrians** - As mentioned in the Department’s previous comments, the DEIR discusses the importance of mobility provided by these modes and offers usage percentages by students and faculty/staff. The Department supports efforts designed to improve access and increase usage of these modes. Analytical methods are available which calculate bicycle and pedestrian LOS’ and also their affects on motorized traffic. The recirculated document continues to omit substantive analysis of this topic.

3. **Transit** - The University continues to set forth laudable goals centered on transit use. However, the Santa Barbara Metropolitan Transit District, as late as March 24, 2009, expressed continued concern about impacts to their operations. Within the re-circulated document there does not appear to be specific discussion that explores increasing service capacity. The University should seriously explore and discuss the purchase of additional buses and ongoing operational needs that will accrue and the effects these actions would have on minimizing the project’s roadway and transit impacts. Impact TRAFFIC 8 and Mitigation TRAFFIC-8A should discuss and quantify this type of solution.

"Caltrans improves mobility across California"
4. **Analytical Method. 4.13.22**

   a. *Trip Generation* – UC Affiliate Population. The recirculated document discusses the UC-affiliated population with more clarity. This population is identified as students, student families, faculty and staff, and their families. In the previous document, this population was determined to reach 36,500 at year 2025. In the recirculated document, it appears this aggregate number will be exceeded. At year 2025, the plan anticipates 25,000 students and 6,289 faculty and staff. The recirculated document indicates that the existing family population is 7,159. This aggregates to 38,448. However, with family populations increasing commensurate with student and faculty/staff growth, the total population will be greater. It does not appear that the trip generation captures this in its entirety.

   b. *Trip Generation* - In section 4.10, the recirculated document discusses indirect job creation and estimates that at least 2,200 jobs will be created as the project matures. However, it does not appear that any of these job-related trips are incorporated into the trip generation assumptions.

   c. *Trip Generation* - As mentioned in the Department’s previous comments, the commercial components of LRDP do not appear to be quantified in terms of Trip Generation. These uses typically are trip generators and trip attractors and should be included. This population appears to be separate from UC Affiliates.

   d. *Trip Distribution* - As mentioned in the Department’s previous comments, the EIR should depict a project specific trip distribution onto the transportation network in the same manner as depicted in existing and 2025 conditions but as a separate figure prior to the set of Figures beginning at 4.13-8A and 4.13-12. Separate figures depicting percentage of trip distribution should also be included. This data would be consistent with select zone modeling analysis.

   e. *Level of Service Methodology and Analysis* - With respect to US 101 NB off-ramp intersection with Glen Annie Road, the PM analysis appears to have used incorrect lane utilization inputs. This worksheet appears to analyze operations as though two dedicated left turns exist. This provides an existing LOS of C. Using Synchro© and correct lane utilization, staff obtains LOS E for existing conditions. This interchange should be reevaluated using correct inputs. Use of Highway Capacity Manual methodology would be preferred.

   f. *U.S. 101 Diverge Analysis* – The diverge analysis is incorrect and the variable Vrt is incorrectly obtained. Flow rates should include all volumes upstream of the diverge. Exiting volumes were incorrectly removed from the calculation. This volume reduction reflects a qualitatively better LOS. Reevaluation is required for each diverge calculation.

   "Caltrans improves mobility across California"
5. **Impacts and Mitigation Measures, Impact TRAFFIC-6 and Mitigation TRAFFIC 6A.** CEQA is quite clear about the nature of mitigation and provides four distinct actions for implementation. These four actions include avoidance, minimization, compensation and rectification. Moreover, the burden of a lead agency under CEQA is to not only disclose impacts but to identify feasible mitigation measures for those impacts. It is the Department’s opinion that this EIR does not meet the burden of CEQA with respect to its treatment of traffic and circulation. Additionally, monitoring programs and data collections are not in themselves mitigation measures and should not be relied upon to satisfy CEQA requirements.

a. *U.S. 101 North of Fairview Avenue* - The document relies exclusively upon widening the freeway to 6 lanes in this corridor for mitigation of merge and diverge impacts. While a previous planning document, the 2004 MTP and Goleta’s General Plan did identify freeway widening this improvement is no longer viable and is not likely to occur within the planning horizon of the UCSB LRDP. In fact, current planning or programming documents such as SBCAG’s Regional Transportation Plan (RTP) no longer supports widening this section of freeway. Therefore, this project should not be considered as a valid mitigation measure. However, the current RTP identifies a project “CT-PL-8” which consists of a group of operational improvements within this corridor. The City of Goleta has identified these improvements in the GTIP and is in the nascent stage of project initiation. The mitigation measure in this corridor should be reevaluated for effectiveness. The University can and should coordinate with the City and determine a pro-rata share for both the PSR and construction costs.

b. The recirculated DEIR has removed widening U.S. 101 to eight lanes south of SR 217 to Turnpike. However, the document does not offer substantive re-evaluation of alternative mitigation measures for this segment of U.S. 101, which the Department previously recommended. Transportation System Management (TSM) strategies such as ramp metering are all too briefly mentioned and essentially brushed aside. Table 4.13-52 *Fair Share* identifies a percentage of responsibility but does not identify the what for, which it is responsible. It is the considered opinion and engineering judgment of the Department that given the impracticality of freeway capacity improvements in this region and the results of multiple traffic analyses, TSM could be a practical solution that warrants additional analysis. In fact, the Department conducted a preliminary warrant analysis based on accepted state of the practice methodology and determined that ramp metering is warranted or will be warranted in the effort to minimize the LRDP impacts to the freeway. Of eleven on-ramp locations, existing conditions at 6 merges currently warrant ramp metering, including the SR217 / US 101 freeway-to-freeway merge. The Department believes the University can and should sponsor and fund a Project Study Report (PSR) for a corridor-wide TSM project and be prepared to fund a portion of the construction of this improvement for an LRDP mitigation requirement. This can be accomplished and phased over time and be commensurate with LRDP growth.

"Caltrans improves mobility across California"
Please know that the Department has stated publicly its support of the mission of all higher educational institutions and fully recognizes the positive economic and cultural impacts the University has on Santa Barbara County and the region. Moreover, Caltrans, in concert with other local agencies, would like to help the university achieve its goals in a sustainable and responsible manner. It is our hope that the university will take a leadership role by instituting innovative and substantive measures in implementing the LRDP that will reduce vehicle trips for its students, faculty, and affiliates. It is our understanding that the University has the authority and ability to make significant design and policy decisions that both limit the need and opportunity for vehicle trips. In fact, our research indicates that other institutions such as UC Santa Cruz, Santa Clara University, UC Davis and Stanford University have had some success in this area. As discussed in the Department’s previous correspondence to the DEIR, University policy can provide a systemic framework that supports and advances sustainable practices that could assist in permanently decreasing transportation and air quality impacts, green house gas emissions, and the use of fossil fuels. These actions would not only demonstrate the UC commitment to supporting the spirit and substance of AB 32 (Global Warming Act) and SB 375 but further establish UCSB as a leader in sustainable land use practices.

In closing I want you to know that the Department’s is fully committed to working cooperatively with the University and local agencies to help UCSB meet its objectives and there is no question that this LRDP is an important first step in this direction. Caltrans staff will make itself available to meet and confer with you over any issues regarding transportation and circulation. Please feel free to contact me if you have questions or seek clarification at (805) 549-3103.

Sincerely,

[Signature]

Larry Newland, AICP
Caltrans District 5
Planning Branch Chief South

c: A. Loe, Deputy Director, Planning CT
J. Kemp, Director, SBCAG
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"Caltrans improves mobility across California"
Response to Comment R-18-1. Upon receipt of the commenter's letter regarding the DEIR, several sections of the Draft EIR were revised and released for public review and comment as part of the Recirculated Draft EIR (RDEIR). The additional analysis is presented in the Recirculated Draft EIR, Section 4.13 Transportation and Circulation. The University is committed to working with agencies and local jurisdictions to ensure a complete and comprehensive impact study is conducted for the LRDP. As part of the RDEIR, the University updated the transportation study to include the additional freeway facility analysis requested by Caltrans, as well as information requested in the remainder of the DEIR comments, which is applicable to some of the responses to comments R-18-2 through R-18-11, below.

The US 101 mainline segment south of SR 217 was included in the LRDP analysis. Based on output for the travel demand forecasting model, traffic volume changes beyond this segment were minimal (less than 2 percent) and were therefore not analyzed.

Response to Comment R-18-2. The effects of bicycle and pedestrian travel on study intersections in Isla Vista, which experience the highest level of non-vehicle travel within the study area, were evaluated in the RDEIR. The additional analysis requested in this comment is presented in the RDEIR Section 4.13. Tables 4.13-9 and 4.13-42 present the findings of this analysis.

On-campus intersections were analyzed using the Highway Capacity Manual methodology and considered signal timings and bicycle and pedestrian crossing times in the LOS analysis. The ICU methodology required by the City of Goleta and Santa Barbara County is based on vehicle volumes and intersection geometry and does not consider signal timings nor the effects of bicyclists or pedestrians.

Response to Comment R-18-3. The University does not operate transit services. Therefore, transit planning must take place in collaboration with agencies that provide such services. It is not feasible or desirable for the University to create a transit plan without the cooperation required by RDEIR Mitigation Measure TRAFFIC-8A. Acquisition of buses may be a result of that coordination process. RDEIR Impact TRAFFIC-8 concludes that the 2010 LRDP will have a less-than-significant impact on transit service. Mitigation TRAFFIC-8A, nonetheless, commits the University to work with MTD and local agencies to improve transit service. Please see responses to comments A-12-48 and A-13-1 for more information on alternative transportation strategies and collaboration with MTD.

Response to Comment R-18-4 to R-18-6. RDEIR Appendix 4.13-3 contains the documentation of the model development for the LRDP transportation impact analysis. As stated in the model development report, the UC Santa Barbara population and housing data were modified as follows.

- UCSB Students - 19,039 students in original model and 16,530 students in LRDP model – the reduction in students is due to the reclassification of students residing in residence halls on the main campus to “on-campus” resident students

- UCSB Faculty/Staff - 9,528 employees in original model and 4,685 employees in LRDP model – the LRDP model removed part-time student employees from the faculty/staff count contained in the original model since these students are already on campus and included in the student land use category (EIR footnote: Table 3.0-5 of the UC Santa Barbara Draft EIR and the corresponding discussion on Page 3.0-13 explains the faculty and staff population data applied to
the LRDP impact analysis. To avoid double counting the impact of students already on campus who happen to have an on-campus job, the 4,685 employee count was used as the baseline for looking at impacts.

- Housing - 1,916 housing units on main campus and 1,789 units on Storke Campus in original model were revised as follows:
  - 3,470 on-campus student beds (main campus Residence Halls)
  - 1,325 student beds on Storke Campus (Francisco Torres Residence Hall)
  - 904 student beds on Storke Campus (University Owned Apartments)
  - 592 family housing units on Storke Campus (University Owned Apartments)
  - 65 faculty/staff housing units on West Campus

Appendix 4.13-3 (pages 11-17) contains the documentation of the trip generation for the LRDP. As stated, the trip generation was based on a combination of traffic count data at existing University uses and travel survey data and validated to existing conditions as follows:

The trip generation rates based on travel survey data for students and faculty/staff were adjusted (increased) so that the trip generation of existing uses matched actual traffic counts at the campus gateways. Increasing the trip generation rates was necessary to account for visitor trips to/from campus (visitors are included in the trip generation rates for faculty/staff). In addition, although many students and faculty/staff typically commute to campus in a mode other than a SOV, they may occasionally drive to campus, which was not reflected in the travel survey results. The final trip generation rates applied to the LRDP traffic study produced existing forecasts that matched existing traffic counts on campus.

Response to Comment R-18-7. RDEIR Appendix 4.13-3 contains a select zone model plot reflecting the distribution of project trips for the LRDP. In addition, traffic volume figures are presented in the Transportation Section documenting traffic volumes with and without the LRDP.

Response to Comment R-18-8. The LOS at the NB 101 Ramps/Glen Annie Road intersection (RDEIR, p. 4.13-15) was analyzed based on the Intersection Capacity Utilization methodology that the City of Goleta uses to calculate LOS. The City of Goleta identified this intersection as operating at LOS B during the PM peak hour as part of the City’s General Plan update (see City of Goleta 2006 General Plan Update EIR, p. 3.13-4). Therefore, the results reported with the LRDP appear to be consistent with the City’s General Plan findings based on the required LOS methodology.

Response to Comment R-18-9. The diverge analysis conducted for the LRDP identified significant impacts at each freeway diverge study location. Modifying the Vf variable as suggested in the comment letter would produce unacceptable operational results of LOS E/F as reported in the traffic impact study and the facilities would continue to operate unacceptably as reported in the RDEIR. Because these facilities are already identified as being significantly impacted by the proposed LRDP, the significant impacts reported in the RDEIR would not be changed by this comment.

Response to Comment R-18-10. The RDEIR does not propose monitoring as the sole mitigation measure for any impact. The effectiveness of TDM measures recommended under the LRDP, however, will be quantified through mitigation monitoring as described in RDEIR Mitigation Measure TRAFFIC-1A(2), with a goal of a 10% reduction. The University will quantify the effectiveness of TDM measures through the collection of actual traffic counts at campus gateways. The TDM program is only one of several proposed mitigation measures. Physical roadway improvements have been identified as mitigation measures assuming that there would be no traffic volume reduction due to TDM as a conservative (i.e., worst-case) scenario. The mitigation monitoring program will be used to identify the appropriate timing for the implementation of
required mitigation measures. Whether the stated improvements on RDEIR page 4.13-153 (freeway widening) are viable or not has no bearing on the acknowledgement that such mitigation measures are necessary to alleviate impacts. Furthermore, because the RDEIR determined that the project’s impact on U.S. 101 north of the Fairview Avenue would be significant and unavoidable, the deletion of this measure does not change the ultimate conclusion.

**Response to Comment R-18-11.** As requested by Caltrans, widening of U.S. 101 beyond six lanes was removed from the LRDP analysis as potential mitigation and ramp metering was recommended as a mitigation measures as follows:

*South of the Fairview Avenue interchange, U.S. 101 is six lanes. Widening beyond the existing six-lane facility is not planned at this time. To improve traffic operations at the Fairview Avenue and Patterson Avenue interchanges and along the U.S. 101 mainline, ramp metering could be implemented at the on-ramps providing access to U.S. 101. Ramp metering could be provided at the following interchanges: Storke Road/Glenn Annie Road, Los Carneros Road, Fairview Avenue, Patterson Avenue, and Hwy. 217. Ramp metering improves operations on freeways by controlling the amount and rate of traffic entering the mainline during peak hours resulting in smoother traffic flows. Metering traffic entering U.S. 101 during the afternoon peak travel hours would improve future traffic operations; however, this portion of U.S. 101 would still operate unacceptably based on Caltrans LOS standards (i.e., LOS D or worse).

Caltrans can and should implement the freeway widening identified in the SBCAG 2004 MTP and the City of Goleta General Plan. If the identified improvements are not implemented the study freeway facilities would continue to operate at a degraded level. Because the improvements are within the responsibility and jurisdiction of Caltrans, this impact is considered significant and unavoidable.*
March 30, 2009

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RE: Recirculated dEIR Comments LRDP 2008

Santa Barbara Audubon submitted comments on the draft EIR June 23, 2008, and now submit comments on the recirculated sections of the draft EIR. We want to be sure that our comments from the first round are addressed in the final EIR, as well response to these comments.

The University is a partner in the community, and we wish to see a cooperative effort for sustainable development. Audubon values the contribution of UCSB, and hopes that with community input a stronger University can emerge consistent with constraints such as water, transportation and energy. We appreciate the plan to house the increase in students and faculty as proposed in the LRDP 2008.

POPULATION AND HOUSING

Lag time enrollment increases & new housing construction.

The recirculated dEIR appears to contain a commitment to provide housing for the enrollment increases within four years, for each incremental increase. That is insufficient, and Audubon requests the commitment to provide new housing before added enrollment. We understand that student housing is often in multiples of 400. If that is the case, then build housing for 400 students, then 400 new students can be added to the enrollment, up the maximum that is approved by full build-out of the LRDP. The dEIR is flawed and fails to mitigate for the added population without this provision.

Reduced enrollment alternative.

The dEIR contains an alternative with 3000 students rather than 5000. While the tables show the areas of same or reduced impact compared to the preferred plan, this alternative should be thoroughly evaluated to see if impacts to water, transportation and energy resources can be adequately mitigated at this level of development. The concomitant reductions in faculty, staff, and academic space need to be delineated and impacts evaluated, to see if this level of development can be managed sustainably.
Housing Imbalance.

Note that the current imbalance in housing supply (POP-2) would not be improved if the new housing were reduced proportionate to the reduced student cap. Analysis of new housing in excess of expansion of students, faculty and staff could be evaluated, and see how this might lessen transportation impacts as well.

AIR QUALITY

4.2.2-3 2008 LRDP Impacts and Mitigation Measures

LRDP Impact AIR-1: Campus growth under the 2008 LRDP would result in daily operational emissions above significance thresholds; therefore, the proposed project may contribute to a violation of air quality standards or hinder attainment of the 2007 Clean Air Plan. Significance: Significant.

LRDP Mitigation AIR-1A: Vehicular Sources. UC Santa Barbara shall implement LRDP Mitigation TRAFFIC-1, TRAFFIC-2, TRAFFIC-4, TRAFFIC-5, TRAFFIC-6 to reduce motor vehicle trips by enhancing bicycle, pedestrian, and transit facilities and services.

LRDP Mitigation AIR-1B: Area. Sources. The LRDP shall support the full implementation of UC Santa Barbara’s Sustainability Plan and the green building policy for higher energy efficiency to ensure that designs and construction features that reduce natural gas dependence are incorporated into all new buildings.

Residual Significance: Significant and Unavoidable.

“LRDP Policies would help reduce emissions from University operations, but not to a less-than-significant level....the impacts would remain significant and unavoidable (p4.2-29).”

Given the significant impact of full build out as proposed in the 2008 LRDP, and the significant residual impacts even with full implementation of the proposed mitigations, Santa Barbara Audubon recommends:

1) Reduced Enrollment Alternative, with a cap of 3000 additional students be evaluated. This alternative would reduce impacts to air quality, transportation, water, aesthetics. Services to students could be enhanced with incorporation of aspects of the Virtual University Alternative. Commensurate reductions in academic space, faculty and staff are needed. The analysis could determine if this level of development could be accommodated.

2) Transit Plan. A comprehensive transit plan that encourages public transit, bicycle and pedestrian use, and car-sharing is needed. The current mix of alternative transit use is presented, and the University has done a lot to encourage the use of alternative transportation. Housing the new growth of students, faculty and staff on campus will reduce traffic impacts but not eliminate trips to the surrounding cities and region for grade schools, shopping, job, and recreation. Goals and mechanisms are needed, with adaptive management needed where goals are unmet.

3) Green building policy. Maximum energy efficiency is needed due to the significant residual impacts; the mitigations are stated to be insufficient, thus maximum mitigations are required under CEQA. The LEED certification goals should be Gold and Silver, not the lowest level of “certified.”
Consistency with the 2007 Clean Air Plan (CAP)

According to the Recirculated Air Quality Section of the DEIR, the region currently does not meet the state standards for ozone and PM$_{10}$. “The 2008 LRDP would not be consistent with the 2007 CAP because the projected growth of the campus was not accounted for in the SBCAG forecasts.”

The document states the one of primary objectives of the LRDP Transportation Chapter is a “pedestrian-oriented academic core with increasing opportunities for alternative forms of transportation especially bicycles (p4.2-28).” For the campus, this seems to be effective if the policies are implemented.

“The follow policies from the LRDP will help reduce vehicle emissions and area source emissions:

TRANS-8. Mesa Road may be widened west of Ocean Road to accommodate bike-lanes and pedestrian paths (p4.2-28).

Comment: This is an inadequate mitigation, “may”! This must be a commitment for implementation, given the unmitigated impacts of vehicle emissions. Additional dense campus housing is planned west of Mesa Road, and the bike lanes and pedestrian paths will be needed to improve safety and encourage alternative transportation between housing and the main campus. Note: At the time of widening of Mesa Road, the University sewer lines should be relocated out of Storke Wetland, and coordination with Goleta West Sanitary District for re-location of their sewer lines to Mesa Road. These actions will allow for restoration of tidal circulation of Storke Wetland. See Audubon’s initial comment letter on the DEIR dated June 23, 2008 [Goleta Slough impacts].

TRANS-9. The campus shall continue to maintain and improve bicycle and pedestrian access way to the beach as necessary to protect sensitive habitat areas and public safely.

Comment. No commitment or goals are provided. Suggested are specific benchmarks, such as a new stairway to the beach from West Campus Bluffs when the first campus housing is constructed at the Devereux School site.

ACC-3. The University, in cooperation with Metropolitan Transit District, shall ensure that regular bus and/or shuttle service is provided between all University housing and the Main Campus.

Comment. This is crucial to the reduction in emissions from transportation. This is a significant component of the Transit Plan that the University should develop. Funding mechanism should be explored, and adaptation of measures such as frequency of service to meet benchmarks of shuttle utilization and reduced auto use from campus housing to the main campus.

ACC-4. The University shall work with MTD to provide transit service to campus neighborhoods and shall provide new bus or shuttle stops in each housing development to maximize convenience and increase transit ridership.

Comment. The University must work in partnership with MTD and provide funding for new routes/frequency of service so that the alternative transportation system is convenient and time-efficient, and thus utilized. Construction of bus stops is insufficient to mitigate the impacts of additional people.

Global Comments on Clean Air Plan Consistency. Santa Barbara Audubon recommends two major measures to increase compliance with the Clean Air Plan. These are necessary as already air quality in the region fails to meet state standards.
1) **Reduced Enrollment Alternative**, with a cap of 3000 additional students to be evaluated. This alternative would reduce impacts to **air quality**, **transportation**, water, and aesthetics; no way to evaluated with presented data if the impacts can be reduced to insignificance.

2) **Transit Plan.** A comprehensive transit plan is needed. It must address the needs of the new campus residents not only for transportation on campus but in the community and region. Expanded Car-sharing, with cars available at each housing “pod” and several places on campus, is needed. This should be a paid service, but all faculty and students should be provided with information that shows how this saves money and greenhouse gas emissions to avoid having a private car, or for families, perhaps an alternative to a second car. Bus or shuttle service to the Goleta train station needs to be improved, and publicized. A no cars policy for freshmen or freshmen/sophomores should be evaluated, and enforcement of the existing policy of no parking permits for those who live within one mile of campus. Exemptions could be made where public transit access from the off-campus housing to campus is demonstrated to be unavailable.

**CLIMATE CHANGE.**

The California Global Warming Solutions Act (AB32) was adopted in 2006, in response to the governor’s Executive Order (S-3-05) for targets to reduce greenhouse gas emissions. By 2020, greenhouse gases are to be reduced to 1990 levels; by 2050, to 8% below 1990 levels (p4.2-43). First we will address the specific measures that the document addresses, then provide our “global” response.

**AB 32 Scoping Plan Measures--applicable to the LRDP (Table 4.2-15).**

**SPM-3: Energy efficiency.** Maximize energy efficiency building and appliance standards...green building standards. The LEED “Certified” rating to which the campus will strive is the lowest certification rating. We assert that, given that the University seeks the **maximum** energy efficiency, LEED Gold or Platinum level, should be sought.

**SPM-4: Renewables Portfolio Standard.** Achieve 33 percent renewables... **SPM-12: Million Solar Roots Program.** Install 3,000 MW of solar-electricity capacity.... Given the extensive construction planned, and the delay likely in renewable energy in the utility sector, and the stated University commitment to sustainability, Audubon recommends an intensive renewable energy program within the university--most probable photovoltaic and solar hot water. (See Campus Sustainability Plan comments). This is an opportunity for the University to demonstrate sustainability.

The draft and recirculated EIR lack analysis of increased energy use at build-out, and the percentage of this increase that would met with the 3000 MW of solar-electric capacity. There is no way to evaluate if this is adequate mitigation.

**SPM-8: Water.** Continue efficiency programs and use clearer energy sources to move water...An aggressive water efficiency program and use of recycled water for landscaping in any remote campus sites and calculation of potable water savings possible with recycled water for toilets in new construction is needed. 20% of electricity in CA is used to move water, so use of local water sources, sparingly, can have a great beneficial impact.
SPM-13: Local Government Actions and Regional Targets. ...quantifiable emission reduction targets.... The University can work with local city and county agencies to set regional targets, but can also set its own targets to meet the S-3-05 and AB32 reductions within the University.


Global Comments on Climate Change and Scoping Plan Measures. It seems impossible for UCSB to meet the emission reduction goals, given the expansion plans. Audubon recommends two means of at least addressing the reduction targets in a meaningful way:

1) Reduced Enrollment Alternative, with a cap of maximum cap of 3000 additional students and commensurate reductions in academic space, faculty and staff. This would reduce the increased emissions from campus growth, however “green” the development.

2) Comprehensive Sustainability Plan, including alternative energy and transit plan. This is discussed throughout these comments.

Campus Sustainability Plan.

The Plan goals and objectives are laudable. However, the Energy goals of a Climate Neutral Plan by 2008 (its now 2009), greenhouse gas emissions to 2000 level by 2010, and 1990 levels by 2020 seem unattainable with the implementation of the proposed LRDP development (Short term goals p4.2-50). There is nothing in the document that leads one to believe its possible, as mechanisms to achieve these targets are missing.

Intermediate and long term goals (SP-3; p4.2-50):

Use 33% less electricity than 2010 baseline by 2050. Where is the data? Current use, about needed for full build-out of LRDP, and how this could be reduced by 33%? The analysis is inadequate.

Reduce fossil fuel usage to 20% of total consumption (used in natural gas fired cogeneration). Where is the data of current usage, anticipated fossil fuel usage at full build-out under “business-as-usual” and mechanisms to avoid that increase and in fact reduce use by 20%? What facilities are suitable for cogeneration? No information was found in the document.

Increase photovoltaic production of 7% of total consumption—about 4.2 million kWh per year. Is this planned photovoltaic installations on campus? All new buildings should provide photovoltaic or at a minimum solar hot water. Parking garages can have solar installations on the upper level, with carport-like structures if not covered. How is the 7% calculated? Current use, electrical use at full build-out under “business-as-usual” scenario, “saved” use with photovoltaic installations….

Increase wind energy production to 20% of total consumption—about 12 million kWh per year. Presumably this is a component of purchased electricity from the local utility. Is there any research to see if that is a likely scenario? The first wind power facility in the county has just been approved. When completed, this project will provide 10% of the county’s electricity (at current levels). We don’t see any opportunity for UCSB to have wind power on its own.

Increase new green technology to 6% of total consumption--We don’t know what this means!.....
The university will look into marketing of emission credits as a means to bridge the cost feasibility gap for green power projects. There appear to be numerous mechanisms for funding alternative energy and sustainability projects. See the attached articles (Audubon_attachments.jpg):

“Colleges wean off fossil fuels” Christian Science Monitor, March 5, 2009. The American College and University Presidents’ Climate Commitment now has 614 colleges and universities has committed to becoming carbon neutral. The article states that donors are willing to sponsor campus environmental projects.

“City officials flip switch on rooftop solar panel” Santa Barbara News-Press, March 12, 2009. The City of Santa Barbara has just completed a rooftop solar installation on the city corporate yard garage on Garden Street. The city was able to finance the installation through a power purchasing agreement with Tioga Energy. In exchange for Tioga paying the upfront costs, the city pays for the electricity generated with a 20-year contract. The rate is just less than they have been paying to power the building, and will insulate the city from electricity price increases in the future.

There are probably many other mechanisms that can provide funds for renewable energy, green building efficiency efforts, and alternative transportation transit plans that address climate change. This is an opportunity for the University to be a model of sustainability.

WATER

The recirculated dEIR on water paints a more optimistic picture than the original dEIR, primarily by looking at the proposed expansion of recycled water capability of the Goleta Sanitary District (GWD), and possible customers’ use of recycled water to free up potable water. There are several problems with the evaluation:
1) Need for funding of the expanded recycled water treatment and treatment to a higher quality of water that could be utilized by users such as flower growers.
2) Lack of commitment of growers and other potential users if this water became available.
2) The notion that any “freed up” or offset potable water in GWD would be available for UCSB.

Audubon concurs with the Goleta Water District that the standard of significance should be:
“If the University’s 2008 LRDP potable water demand exceeds the District’s available potable water supply in the planning period, it is a Class I significant and unavoidable impact.”

The comments by the Goleta Water District state that the University underestimates water demand and overestimates the water supply in the community.

There would need to be negotiations with the GWD for expanded water allocations, probably funding for the expanded recycled water capacity and improved water quality, funding for the outreach program for potential users of recycled water, and commitment that UCSB could increase their allocations by the amount of potable water preserved by these measures.
There are clearly other developments that have or have not been considered that are not currently part of the GWD evaluation of future water needs, just as the LRDP expansion is not included. Thus it is inappropriate to assume that any future water not already allocated would be available to UCSB.

Regarding recycled water consumer, the Glen Annie Golf Course currently uses about 20% of the recycled water produced locally. They are considering plans to dismantle the golf course to build housing or other non-golf course uses. This could decrease demand for recycled water and increase demand for potable water.

The projected 856 AFY additional needed at full build out for the LRDP is more than is likely to be available in the GWD. The calculated needs remains about 498 AFY beyond the current allocation. In fact, the GWD states the baseline should be about 700 AFY, as about 150 AFY is for approved but not constructed facilities.

Audubon recommends several strategies for addressing this water deficit:

1) **Reduced alternative** with a student cap of 3000 and commensurate reductions in academic construction, faculty and staff. A calculation of the water demand under this alternative is needed.

2) **Water duty factor reduction**, to be achieved by aggressive water efficiency efforts for all new construction, and retrofit of existing buildings. Examples would be waterless urinals, which have been installed in some locations on campus.

3) **Recycled water use expansion** at all campus sites.
   a) Looping of “dead end” reclaimed water lines to improve reliability. This was mentioned in the original dEIR as a means of improving reliability but was not proposed as part of the LRDP. It should be.
   b) Extend recycled water lines to all campus sites; probably lines are not in place to the Devereux School site, the Storke Family Housing or North Campus housing. The 90% landscaping use of recycled water can be expanded to 100%.
   c) Use of recycled water for toilets should be re-evaluated, and the offset of potable water use calculated.

**Mitigation W-3A.**

*New UCSB development shall make use of recycled water to the maximum extent feasible. Recycled water will be used for bathroom fixtures and/or irrigation.*

Given the GWD’s lack of market for recycled water or funds for expanded distribution, it behooves the University to create market to the maximum extent feasible. This mitigation should state “**Recycled water will be used for bathroom fixtures AND irrigation.**” See 3c above.

Audubon opposed the purchase of State Water Project allotment as an unreliable source of water, especially during drought conditions. We are currently in the third year of drought, and water deliveries are likely to be 15% of demand (this may have been increased recently to 20%). The funds to purchase an allocation of water that may not be available when needed could better be spent on water conservation and plumbing to utilize recycled water. Limitation of growth within sustainable water availability is a must. As climate change worsens, even with successful measures to combat it, California’s climate is forecast to become more variable--more extremes
of wet years and dry years. Thus the State Water Project can be expected to become less reliable than it is currently.

**TRANSPORTATION**

The expanded analysis of impacts of more cars anticipated with build-out of the LRDP, and the poor existing level of service of intersections near campus, are evaluated in the recirculated dEIR. To Audubon, this demonstrates that a comprehensive transit plan that deemphasizes private vehicles is needed to address the transportation needs of the current and future residents/students and employees of the campus, and of the surrounding community.

Granted, the University is not offering to mitigate the impacts of all these additional cars. However, the cost is likely to be lower and transportation improved if alternative transportation is primary and private vehicles secondary. Foundations and private donors may be willing to help fund a model transit program that could be replicated in other campus communities.

Audubon includes all comments by reference on the Transportation Section from our June 23, 2008 letter.

Audubon recommends two general strategies for addressing transportation impacts:
1) **Comprehensive Transportation Plan.** See elements, below.
2) **Reduced enrollment alternative.** Evaluate the transportation impacts with a cap of 3000 students.

**Table 4.13-9 Bicycle, Pedestrian and Vehicle Traffic Signal Warrants--Existing Conditions.** If delay to motor vehicles from pedestrians and bicyclists is a community priority, a traffic signal with pedestrian and bicycle signals may be warranted at these intersections based on volume criteria.

**Comment:** This table evaluated the intersections on Embarcadero del Norte, and demonstrates the high pedestrian and bicycle use in Isla Vista. The comment accompanying the table, unfortunately, demonstrates the car-centric nature of the dEIR analysis. It suggests that if the cyclists and pedestrians delay cars, then signals might be installed. What about safe mobility for cyclists and pedestrians??

**Parking (p4.13-30)**

The LRDP proposed to provide one parking space for every four students residing on the Main Campus (p4.13-43). Audubon recommends that the University explore prohibition of autos for all students living on campus, for all freshmen and sophomores, and all freshman. The documents do not mention the costs to students who have a car on campus. Many campuses prohibit students, at least some, from having cars on campus. Serious analysis is needed to develop the appropriate strategies for UCSB.

Pricing mechanisms for parking a second car should be explored for families living in UCSB housing, and alternatives such as Zip car membership, shuttles to campus and MTD service to the community should be available and sufficiently convenient that second cars are an infrequent choice.
These are not *niceties*, but significant mechanisms for addressing traffic jams, air quality, and global warming.

**TRANS-8.** *Mesa Road may be widened west of Ocean Road to accommodate bike-lanes and pedestrian paths.*

*Comment.* Change to “Mesa Road *shall* be widened...to accommodate bike lanes and pedestrian paths.” As mentioned in the Air Quality section, above.

**New walkway along Devereux Road at West Campus (4.13-27).**

We didn’t find any additional information about this walkway. However, the existing road is very narrow, with wetlands on both sides (constructed on fill in the wetland when a private estate). One-way vehicular traffic, which has been considered, is a must if a walkway is to be provided. This would improve pedestrian and bicycle safety.

As mentioned in the Audubon Comment letter 6/2008, Slough Road Improvements, the circulation improvements should be accompanied with improvements to the hydrology, by replacing the culverts under the road.

**Table 4.13-56 Peak Hour Intersection Operations--Santa Barbara County...**

The EIR states the University will fund a “Proportional share” of intersection improvements, and the County should be responsible for the improvements. However, El Colegio and Los Carneros/Mesa Road are almost exclusively University-related traffic. For these intersections close to campus, the University should assume the majority of funding responsibility.

**Comprehensive Transportation Plan Needed.**

Some elements suggested for a comprehensive transportation system could include:

1) Comprehensive bicycle routes and parking on and between all UCSB campuses. Given the high usage of bicycles now, this is crucial to the program. Ensuring that bicyclists can safely and efficiently cross the modified Ocean Road is a major requirement of the program.

2) An electric shuttle between all housing clusters and academic facilities. This could be operated separately by campus or by MTD, if negotiated and funded.

3) MTD-coordinated service to campus and to middle school, high school, shopping and recreational destinations. High levels of service will encourage usage. This will require long-term operational funding for MTD.

4) Expansion of the Zip Car service, with cars available at all housing clusters and on the main campus.

5) Improved connection to the Goleta train station.

The bus system would benefit from an electronic announcement system, so riders know when the next buses are arriving for various routes. This is common in commuter train and subways, less so for bus systems. Audubon suggests working with MTD, seek grant funding, for a demonstration system for the campus.

A Bren School student project could address some of these issues, such as the incentives, disincentives, and prohibitions that could influence transit choices of students, faculty and staff.
Evaluation of other campuses, and recommendations for a transit program would be an excellent project and could benefit the campus and community.

The traffic impacts need to be “pre-mitigated” due to the already poor level of service of some intersections, and to maintain public safety for bicyclists and pedestrians. Prohibition of cars for freshman and possibly other students living on campus can be implemented for the new class as soon as the LRDP is approved. So can enforcing the no parking permit regulations already in place. Improved bus service, and free bus passes for staff and faculty, could be instituted early on.

Summary.

Santa Barbara Audubon is disappointed that the recirculated EIR does little to reduce the impacts of the proposed LRDP increased enrollment and expansion of academic space. Significant work is still needed to mitigate the impacts, and evaluate in greater detail a reduced-enrollment alternative. The comments received from the Goleta Water District, the City of Goleta, and the County of Santa Barbara should also be considered, to modify the plan and expand mitigations to create a truly sustainable University that is compatible with the community.

Sincerely,

[Signature]

Darlene Chirman, President
Response to Comment R-19-1. Please see responses to comments A-10-1 and A-12-1.

Response to Comment R-19-2. The DEIR analyzes each alternative to the extent required by CEQA, which does not mandate a full, quantitative analysis of each alternative but comparison to the proposed project. See CEQA Guidelines § 15126.6(d). However, the EIR does provide a narrative of how impacts would likely be affected in subsection 5.2.2.1 (EIR, p. 5.0-15). Please see response to comment A-17-5.0 for more information.

Response to Comment R-19-3. See Section 5.0, Table 5.0-1. The table includes an overview of the alternatives and how the level of each impact changes within each area analyzed in the EIR. Within the “reduced enrollment alternative” column (representing the 3,000 student increase) it is noted, as the commenter points out, that the impact level of POP-2 is approximately equivalent to the primary proposal (the 5,000 student increase).

The advantage of the Reduced Enrollment alternative is primarily in conjunction with the reduced campus population and the lessening of associated impacts. Building more campus housing than required by enrollment increases would not necessarily reduce many of the significant impacts addressed in subsection 5.2.2.1.

Response to Comment R-19-4. A. Section 5.0 of the DEIR analyzes a Reduced Enrollment Alternative (DEIR, p. 5.0-15).

B. Please see responses to comments A-12-48 and A-13-1.

C. The significance of Impact AIR-1 would not be reduced to a less-than-significant level, because of the inconsistency with the 2007 Clean Air Plan. Although the LRDP and EIR identify various energy efficiency standards and goals, the 2010 LRDP growth was not accounted for in the SBCAG forecasts. It is the policy of the University that all new campus construction projects programmed after July 1, 2004 shall meet LEED-NC Silver certification and surpass Title 24 requirements by 20%. The March 2007 UC Policy on Sustainable Practices requires that the campus strive to achieve at least a LEED Silver rating. Please note, however, that the air emissions model is not able to calculate all the emissions-reducing strategies to which the University is committed (such as many LEED-based measures), and that this is a “worst-case scenario” of impacts.

Response to Comment R-19-5. A. The comment refers to LRDP Policy TRANS-8, which is not a mitigation measure. As required by Mitigation Measure TRAFFIC-7A (RDEIR, p. 4.13-156), the University will implement the proposed bicycle and pedestrian improvements, which include permanent and formal establishment of bicycle routes along Mesa Road, as well as pedestrian trails and paths.

B. The following mitigation measure has been added to the Biology Section of the EIR:

LRDP Mitigation BIO-1E: The University shall work with the City of Santa Barbara and West Goleta Sanitary District to reintroduce tidal influx to the Storke Wetlands.

Response to Comment R-19-6. The comment refers to LRDP Policy TRANS-9, which is not a mitigation measure. LRDP Mitigation REC-2B commits the University to maintain specific beach access facilities. Specific access points and facilities are presented in LRDP Figure E.3, which includes a proposed stairway from the West Campus bluffs as suggested by the commenter.

Response to Comment R-19-7. RDEIR Mitigation Measure TRAFFIC-8A commits the University to working with other agencies, including Santa Barbara Metropolitan Transit District, to develop appropriate transportation improvements, potentially including a transit plan. Please see response to comments A-12-48 and A-13-1 for more information.

Response to Comment R-19-8. The Reduced Enrollment Alternative is analyzed in the DEIR, which determines that it would reduce the impacts that the commenter mentions (see DEIR Table 5.0-1, p. 5.0-5).

The University will work with other public agencies in the region toward meeting regional transit needs, as required by LRDP Mitigation TRAFFIC-8A on page 4.13-158. Please see response to comment #7, above.

Response to Comment R-19-9. A. Please see response to comment R-19-4c, above

B. The campus has a Campus Sustainability Plan (see RDEIR, p. 4.2-46). Pursuant to RDEIR Mitigation Measure AIR-1B, the campus is required to support the full implementation of this plan. The Plan’s energy-related measures are summarized on RDEIR page 4.2-50. The suggestion to use 3,000 MW of solar-electricity generation capacity is noted. As individual projects under the 2010 LRDP are proposed, these projects will incorporate specific design features to achieve the requirements set forth in both the EIR and other documents such as the Sustainability Plan and UC Policy on Sustainable Practices.

C. As stated on RDEIR pages 4.14-23 to 24, 90% of the landscape irrigation on campus uses recycled water. The University has its own goals for reduced potable water use and increased reclaimed water use, as listed in the Campus Sustainability Plan (SP-9).

D. As stated on page 4.2-63 of the RDEIR, 2010 LRDP GHG emissions impacts are consistent with CARB’s Scoping Plan control measures and the AB 32 emissions goal.

E. The discussion on DEIR page 4.16-3 explains that the campus is compliance with waste diversion goals and requirements. As of the writing of this EIR, the University exceeded the required waste diversion rate, and continued and expanded recycling efforts will contribute to a further lessening this impact. However, the impact of the 2010 LRDP on solid waste (Impact UTIL-1) is considered significant and unavoidable, because these waste diversion measures would require building new or expanded collection and recovery facilities which is outside the control of the University.

F. Please see responses to comments R-19-8 and R-19-9b.

Response to Comment R-19-10. Pursuant to RDEIR Mitigation Measure AIR-1B, the campus is required to support the full implementation of the Campus Sustainability Plan. Because implementation of the Campus Sustainability Plan, as well as implementation of the sustainability policies of the 2010 LRDP and applicable measures in the CARB Scoping Plan, would reduce business-usual more than the 30% necessary to achieve the goal of AB 32, the impact of 2010 LRDP greenhouse gas emission would be less than significant (see RDEIR Table 4.2-21 and pages 4.2-59 to -61). Please see RDEIR pages 4.2-12 to -16 (describing the UC Policy on Sustainable Practices), pages 4.2-46 to -51 (describing the Campus Sustainability Plan), pages 4.2-54 to -55 (describing LRDP policies supporting sustainability), and pages 4.2-59 to -60 (describing applicable CARB Scoping Plan measures and CARB Interim CEQA Significance Thresholds).

Response to Comment R-19-12. A. Please see Master Response - Water Supply section V.A.

B. Please see the response to comment R-13-53.

C. Regarding the GWD comments on the RDEIR’s estimates of water supply and demand, see the responses to comment letter R-13. Please see Master Response - Water Supply section V.D regarding the University’s water permits and agreements, section V.A regarding future recycled water capacity, and section V.E regarding the scope of the cumulative impacts analysis.

D. Please see Master Response - Water Supply section V.A and the response to comment R-21-25.

E. Please see Master Response - Water Supply sections II and VI.D.

F. Please see Master Response - Water Supply section VI.C.1.

G. Please see Master Response - Water Supply sections IV.B regarding the reliability of SWP deliveries.

Response to Comment R-19-13. The traffic impact analysis in the RDEIR uses each adjacent jurisdiction’s significance criteria for impacts within that jurisdiction. Other commenters have stated that pedestrians and bicyclists may add delay to intersections and degrade vehicle traffic operations. The RDEIR also considers impacts on bicycle and pedestrian circulation on campus, in Impact TRAFFIC-7, and concludes that these impacts are less than significant. Please see response to comment I-44-8A for more information on bicycle safety.

Response to Comment R-19-14. Please see response to comment A-12-49 regarding prohibition of cars for freshmen and sophomores. Regarding measures to reduce single-occupancy vehicle trips, please see response to comment R-4-19.

Response to Comment R-19-15. Please see the response to comment R-19-5.

Response to Comment R-19-16. Mitigation Measure BIO-1D (DEIR, p. 4.3-31) requires development within 100 feet of aquatic resources to incorporate project design features that will minimize impacts to adjacent aquatic resources.

Response to Comment R-19-17. Please see Master Response – Traffic Fair Share Mitigation.

Response to Comment R-19-18. A. The LRDP proposes a comprehensive bicycle network, including dedicated and shared lanes, throughout all areas of campus and connections with regional bicycle routes (see RDEIR Figures 4.13-4A and 4.13-4B).

B. The University provides several programs for alternative transportation (see RDEIR page 4.13-46), and would continue to do so in the future. Please see responses to comments A-12-36, A-12-48 and A-13-1.

C. Please see response to comment R-19-18B.

D. Please see response to comment R-19-18B.

E. Please see response to comment R-19-18B.
This is in regards to the February 2009 Revised EIR for the UCSB LRDP.

We request that the widening of El Colegio be completed, which is a preferable alternative to the Phelps/Mesa connection.

The opening and widening of Phelps Rd. would pose significant health and safety concerns to the Storke Ranch residents on both sides of Phelps as well as the IV Youth Project, and the many bicyclists and pedestrians who use Phelps Rd.

**Opening Phelps Rd** would increase the traffic between Bayberry and the fire gate from a current 33 cars to an estimated 7,000 per day which is a phenomenal and unacceptable increase, and the Phelps/Bayberry intersection would be severely impacted by those numbers. The opening and widening of Phelps would divide our Storke Ranch community and increase air pollution, noise and traffic hazards to extremely unhealthy levels for all residents and the vulnerable children attending the IVYP whose play area is within a few feet of Phelps Rd.

We request the University **Storke Family Housing Site** adjacent to Storke Ranch to the east be reviewed and the **proposed density and height limits reduced** to be consistent with the existing community. A **100 ft. green space** with trees and other landscaping should be created between the new buildings and Storke Ranch to provide a buffer and to protect the health of the Storke Ranch residents during demolition and construction. This buffer zone should be created prior to the demolition to protect the residents, due to the mold infestation in the present Storke Family Housing site. We also request that the garages and garbage access be reoriented to minimize noise impacts on the adjacent Storke Ranch residents.

As residents of Storke Ranch we strongly oppose opening Phelps and as residents immediately adjacent to the Storke Family Housing site we are concerned with the density, height and scale of this neighboring project. We have been good neighbors and...
supporters of the University and we ask that the University planners respect and reciprocate with their support for the concerns of their Storke Ranch neighbors.

Sincerely,

Dr. & Mrs. Ernest Kolendrianos
6769 Sweetwater Way
Goleta, CA 93117
Response to Comment R-20-1. Please see Master Response - Phelps/Mesa Connection.

Response to Comment R-20-2. Regarding the transition between Storke Family Housing and Storke Ranch, please see Response to Comment I-1-2 and A-12-51.

Regarding garage orientation, Mitigation Measure NOISE-4B has been amended as follows:

LRDP Mitigation NOISE-4B: Limits on Truck Deliveries and Other Activities. The Campus shall require commercial and industrial uses in close proximity to residential areas to restrict the hours of truck deliveries and trash pickups to minimize disruption to nearby residences, where feasible class times, exam times, traditional sleeping hours, etc., and to nearby residents.

The DEIR concludes that with the application of this and other identified mitigation, the Project will not have significant impacts related to noise; no further mitigation is required.

The fugitive dust control measures contained in Mitigation Measures AIR-3A(1) through 3A(7) will be sufficient to protect Storke Ranch residents from contamination related to Storke housing demolition. No further measures are required.
March 30, 2009

University of California
Office of Campus Planning & Design
c/o Vision2025
Santa Barbara, CA 93106-1030

RE: Comments on the Recirculated Draft Environmental Impact Report for the Proposed 2008 Long Range Development Plan for the University of California at Santa Barbara

*Submitted electronically to info@UCSBVision2025.com, with hard copy to follow

Dear Ms. Hummer:

On behalf of my client, the Sustainable University Now Coalition (“SUN”), I hereby submit these comments regarding the Recirculated Draft Environmental Impact Report (“RDEIR”) for the proposed 2008 Long Range Development Plan (“LRDP”) for the University of California at Santa Barbara (“UCSB”). SUN is a coalition of 12 local community non-profit organizations who are committed to advancing the proposition that UCSB should be the leader in sustainability, not just within its “four walls,” but in the community as a whole. SUN’s members include: Associated Students- Legislative Council (USCB), Citizen’s Planning Association (CPA), Coalition for Sustainable Transportation (COAST), Chilla Vista (UCSB), Community Environmental Council, League of Women Voters of Santa Barbara, Santa Barbara Audubon Society, Santa Barbara County Action Network (SB CAN), Sierra Club Los Padres Chapter - Santa Barbara Group, PUEBLO Education Fund, Santa Barbara Channelkeeper, Santa Barbara Urban Creeks Council and Heal the Ocean.

SUN has committed substantial resources to participating in the public review process of UCSB’s proposed 2008 LRDP. SUN’s Principles, set forth in Attachment A, express its support and appreciation for the contribution UCSB students, faculty, staff and administration make to our community. SUN believes that it is essential that the entire Santa Barbara County community be involved in the LRDP process given UCSB’s development impacts on the future of the region.

As the only coastal campus, UCSB’s development plans have far reaching implications on the public’s access to, and safe use of, the ocean and beaches. Impacts include limitations on access due to traffic and lack of parking, plus increased pollution resulting from both runoff and inadequate wastewater treatment.
The RDEIR identifies **18 significant and unavoidable impacts** that would result from the proposed LRDP in **just five impact areas**. In addition to all of the significant, Class I impacts identified in the RDEIR, however, the LRDP will result in even more – and more severe – impacts to our community and to the Environment, as identified below.

The RDEIR fails to meet the basic requirements of the California Environmental Quality Act ("CEQA"), Public Resources Code, § 21000 et seq., in the following ways:

- Is missing critical information in the Project Description;
- Underestimates impacts to Air Quality, Housing, Traffic, Water and Wastewater;
- Still fails to accurately disclose and address emissions of greenhouse gases;
- Contains ineffective, unenforceable mitigation measures that are not based on substantial evidence in the record;
- Failed to revise the Alternatives analysis despite addition of significant new information in Air Quality, Housing, Traffic, Water and Wastewater impacts;
- Failed to provide and consider meaningful alternatives that would lessen environmental impacts;
- Omitted critical information from the Cumulative Impacts analysis.

Correction of these and other deficiencies that are discussed below will result in “significant new information” that must be added to the RDEIR. Accordingly, as required by section 15088.5 of the CEQA Guidelines, the RDEIR must be revised and re-circulated, again. A failure to do so will result in a legally deficient FEIR that cannot be certified.

I. **Summary of SUN’s Key Comments**

UCSB’s own goals for sustainability on campus appear unattainable, given the growth they project and the mitigations they propose. SUN’s response to the LRDP and RDEIR are based on the following key points:

1. **Traffic and parking impact caused by the LRDP will have a significant, detrimental effect on access to and use of California public beaches in the South Coast of Santa Barbara.**

   As the LRDP and RDEIR currently stand, the Coastal Commission should be concerned that access to oceans and beaches throughout the South Coast would be severely limited by an excess of traffic and a severe shortage of parking for the public.

2. **The proposed LRDP is overly private automobile centric, continuing to use a 20th Century circulation model for a 21st Century world.**

   For example, this plan
   - Provides many new parking spaces but not even one more bus stop on campus through 2025.
   - No specific programs or timetables or funding for “carrots and sticks” to significantly shift transportation to carpooling, mass transit, biking, telecommuting, non-peak commuting, etc. When combined with UCSB’s poor track record of
achieving the reduction of automobile use, there is little reason for optimism that
the mitigations stated in the current LRDP and RDEIR will be effective in reducing
traffic.
• Most of UCSB’s mitigations are about increasing capacity of surrounding roads
and intersections, which history has shown will invite more traffic by private
automobile. In contrast, many of these road expansion mitigations would be
unnecessary in a less car-centric plan.

3. UCSB has a responsibility to mitigate impacts resulting from the traffic it has already created
and not just the incremental effects of the proposed new growth.
One of the RDEIR’s main contentions is that traffic is already bad and if the RDEIR changes are
implemented, traffic will be no worse. This ignores the fact that current local traffic congestion is
significantly due to UCSB’s past growth whose impacts were either underestimated or
unmitigated. Also, UCSB’s past traffic projections and mitigations make current projections
highly suspect.

UCSB must be strongly committed to facilitating pedestrian, bicycle, and public transit while
actively discouraging the use of private cars, and provide resources and incentives to achieving
this shift. This would not only mitigate traffic, parking and air quality concerns but would also
help meet national goals of reducing use of fossil fuels and their effects on climate change.
Accordingly, a final RDEIR should embody a systematic and detailed transportation plan toward
this end.

4. The Housing Plan creates a housing deficit in two ways.
First, it provides less housing than the demand it will create in our community. Second, it has a
built in “lag” of several years between the time additional people arrive and the time incremental
housing is available to them. The plan exacerbates what is already a jobs/housing imbalance that
is at critical levels in our community. UCSB must reverse this trend by building the housing
proposed in the RDEIR while reducing the number of students and concomitant faculty and staff it
proposes adding.

It is imperative that housing built as part of the LRDP is maintained for the use of the UCSB
faculty, student and staff population.

5. There is a lack of congruence between the proposed LRDP and the Isla Vista Master Plan.
The result is to create considerable public uncertainty about the future of the area. Instead,
UCSB’s RDEIR must explicitly integrate IV development with its own plans with respect to
housing, traffic, and services.

6. UCSB underestimates South Coast Santa Barbara County water needs resulting from UCSB
expansion under the LRDP while overestimating the region’s water supply. According to the
Goleta Water District (“GWD”), the RDEIR’s assessment of water supply is inaccurate and an
overestimate of water available to support the LRDP. The GWD also concludes that the
University’s water demand figures are underestimates. As a result, the RDEIR fails to accurately
disclose the impacts to water, the impacts are underestimated and the mitigation measures are not
sufficient to lessen the impact to the maximum extent feasible.
7. While the LRDP and its mitigations depend entirely on a stated cap in the number of student “headcount” by 2025, it lacks clarity and specificity on exactly how that headcount is to be determined, when and by whom.

Nor is there specificity on the limit on the number of students to be added in any given year, or what “penalty” will apply if the cap number is exceeded in any given year or at the end. As long as the RDEIR lacks definitions of and limitations on its key benchmark of growth, the headcount cap, the RDEIR is fundamentally flawed, and so is the RDEIR.

We call on UCSB to demonstrate leadership in creating sustainable communities starting right here, right now in a revised LRDP and RDEIR.

II. The DEIR Omits Critical Information from the Project Description.

An accurate, complete and sufficiently detailed project description sets the stage for the impact analysis and review necessary to properly inform decision-makers – a review that is the cornerstone of CEQA. An accurate project description is the “sine qua non of an informative and legally sufficient EIR.”

One of the primary components of the proposed LRDP is the number of faculty, staff and students it proposes to add – which is identified as 5000 additional students, 336 additional faculty, and 1400 staff. (DEIR 3.0-1.) Yet, the DEIR fails to disclose how the student head count will be determined. For example, there is no statement of when counts are taken, whether part time students count as a full, single headcount or if students studying abroad are included in the headcount for purposes of the cap.

This is a necessary component of the proposed LRDP that should have been disclosed in the Project Description and will significantly affect the RDEIR’s impact analysis. The primary impacts caused by the proposed 2008 LRDP stem from the increased number of students and faculty. Most, if not all, of the significant impacts to air quality, population and housing, transportation and circulation and water identified in the RDEIR are a result of this significant increase in students and faculty. In fact, the only distinguishing component of the environmentally superior alternative identified in the DEIR to lessen impacts, the Reduced Enrollment alternative, is that it has 1/3 fewer students and faculty.

As such, it is critical that the RDEIR disclose how student head count is determined.

Although the University appears to use certain criteria for determining head count, these criteria must be made explicit and public. The RDEIR must be revised to disclose how students will be counted for purposes of calculating the enrollment cap. Moreover, there must be some predetermined way of calculating a “penalty” or way to make up the difference if the cap is exceeded.

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In addition, it appears that UCSB intends to increase its population by a specific percentage, yet the RDEIR does not specify the population that will not be exceeded in each year. The LRDP and the RDEIR must specify the **pace** at which UCSB will add students in order to assure that mitigations will keep pace with the resulting impacts.

The following information must be disclosed in the RDEIR.

**Students who must be counted as part of the cap total:**

- Students who are undergraduates or graduates taking any courses for credit at UCSB’s Santa Barbara Campus.
- Students in the above category, regardless of any additional teaching or staff duties they may have, as Teaching Assistants or Administrative Assistants, for example.
- Students in the above category measured by an average of the 3 non-summer quarter and determined within 6 weeks if the start of each quarter. This is not a “rolling average.” Instead, the average is determined beginning with the fall quarter and continues until the summer quarter. The average of those 3 quarters shall not exceed the cap for the year ending with the start of the summer quarter. For example, if there are 20,000 students in the Fall of 2008, 19,500 in the Winter quarter of 2008, and 20,500 in the Spring quarter of 2009, the average for 2009 will be 20,000 students.
- Students auditing classes.
- Students who are in enrolled in any other school such as high school or SB City College, but taking courses at UCSB’s Santa Barbara Campus.

**Students who should not be counted:**

- Those studying abroad or at another campus.
- Those on leave of absence, as long as they do not live in campus housing.
- Those who are studying in the summer, as long as the total summer enrollment does not exceed the average attendance of the other 3 quarters.
- Those people who are doing research but not for credit or auditing.
- Students living outside of Santa Barbara County doing “remote learning,” meaning they do not attend classes at UCSB’s Santa Barbara Campus or related facilities.

**Penalty for exceeding the cap:**

There must be a penalty that is automatically imposed if UCSB either grows at a pace faster than it committed to or if it exceeds its cap.
III. The RDEIR Fails to Adequately Assess and Mitigate Impacts as Required by CEQA.

An EIR must describe feasible mitigation measures which will avoid or substantially lessen each significant environmental effect to the maximum extent feasible. A lead agency cannot approve a project if there are feasible alternatives or mitigation measures that would avoid or substantially lessen significant impacts.

The lead agency’s decision with regards to the feasibility of mitigation measures must be based on substantial evidence in the record. Decisions regarding whether or not alternatives and mitigation measures substantially lessen or avoid significant impacts must also be based on substantial evidence in the record.

Moreover, mitigation may not be deferred. As a matter of law, an agency cannot defer consideration or adoption of mitigation measures to a later date. Deferral may only be allowed where there is a reasonable expectation of effectiveness and compliance based on a requirement that the measure meet specific performance standards that are identified in the EIR. The impacts of proposed mitigation measures must also be discussed in the RDEIR.

As identified below, the RDEIR fails to comply with the mandates for CEQA with respect to the analysis of the environmental impacts, and proposed mitigation measures.

A. Air Quality

The RDEIR’s proposed mitigation measures are defective because they lack sufficient detail and are not enforceable.

TRANS-8. Mesa Road may be widened west of Ocean Road to accommodate bike-lanes and pedestrian paths.

Comment: This should be a commitment. Additional dense campus housing is planned west of Mesa Road, and the bike lanes and pedestrian paths will be needed to improve safety and encourage alternative transportation between housing and the main campus.

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7 CEQA Guidelines §15126.4(a)(1).
Note: At the time of widening of Mesa Road, the University sewer lines should be relocated out of Storke Wetland, and coordination with Goleta West Sanitary District for re-location of their sewer lines to Mesa Road. These actions will allow for restoration of tidal circulation of Storke Wetland.¹

**TRANS-9.** The campus shall continue to maintain and improve bicycle and pedestrian access way to the beach as necessary to protect sensitive habitat areas and public safety.

*Comment.* No commitment or goals are provided. Suggested are specific benchmarks, such as a new stairway to the beach from West Campus Bluffs when the first campus housing is constructed at the Devereux School site.

**ACC-3.** The University, in cooperation with Metropolitan Transit District, shall ensure that regular bus and/or shuttle service is provided between all University housing and the Main Campus.

*Comment.* This is crucial to the reduction in emissions from transportation. This is a significant component of a Transit Plan that UCSB should develop. A funding mechanism should be explored, and adaptation of measures such as frequency of service to meet benchmarks of shuttle utilization and reduced auto use from campus housing to the main campus.

**ACC-4.** The University shall work with MTD to provide transit service to campus neighborhoods and shall provide new bus or shuttle stops in each housing development to maximize convenience and increase transit ridership.

*Comment.* The University must work in partnership with MTD and provide funding for new routes/frequency of service so that the alternative transportation system is convenient and time-efficient, and thus utilized. Construction of bus stops is insufficient.

**Feasible Mitigation Measures that must be considered in the RDEIR.**

According to the RDEIR, campus growth under the proposed LRDP will cause significant air quality impacts that currently remain unavoidable even with the proposed mitigation. The RDEIR discloses that the LRDP would not be consistent with the 2007 Clean Air Plan, which is in place to prevent further degradation of the state’s ozone and PM10 air quality standards.

Thus, SUN recommends that the following mitigation measures to reduce air quality impacts be explored and developed:

1) **A Reduced Enrollment Alternative**, based on less than the University’s LRDP planned growth rate. This alternative would reduce impacts to air quality, transportation, water, housing and aesthetics. Services to students could be enhanced with incorporation of aspects of the Virtual University Alternative. Some reductions in the expected academic space, faculty and staff would result.

¹See Attachment B, see letter from Santa Barbara Audubon Society, Inc. re DEIR for the LRDP, March 28, 2008.
2) **Transportation Plan** The final RDEIR must embody a systematic and detailed transportation plan. This would not only address air quality concerns, but also mitigate traffic and parking and would also help meet national goals of reducing use of fossil fuels and their effects on climate change.

3) **Green building policy.** Maximum energy efficiency is needed due to the significant residual impacts. The LEED certification goals should be Gold and Silver, not the lowest level of “certified.”

**The RDEIR fails to disclose the proposed LRDP’s GHG Emissions and resulting impacts on climate change.**

It appears that Table 4.2-20 attempts to disclose the GHG emissions from the proposed LRDP; however, the Table is misleading, inaccurate and fatally flawed in several respects.

*First, the RDEIR provides a confusing GHG inventory in Table 4.2-20.* The RDEIR states that the GHG emissions disclosed do not reflect “business as usual emissions” because they “already incorporate reductions associated with transportation demand management measures, water conservation, energy conservation, and solid waste reduction.” (RDEIR 4.2-59.) What “measures” is the RDEIR referring to and how did they quantify the emission offsets from these measures? How were the GHG emissions calculated? The RDEIR fails to provide sufficient detail as to how the values in this Table were derived and calculated, rendering it useless as a tool to inform decision makers and evaluate impacts.

*Second, the RDEIR uses an incorrect and preposterous baseline to assess GHG impacts.* Under CEQA, the baseline against which impacts are to be measured is the physical environmental condition at the time of the Notice of Preparation. Table 4.2-20 compares GHG emissions from the LRDP with housing against the LRDP without housing, and then erroneously concludes that by including housing the LRDP has reduced its potential GHG emissions by 43%, thus “GHG emissions are reduced to levels which are less than the significance thresholds.” RDEIR 4.2-59. This is an unfounded conclusion that is based on a false baseline. The LRDP GHG emissions impacts must be calculated and compared against the current environmental setting that exists today in the air basin – the same way the RDEIR assessed the rest of the impacts in the RDEIR as required by CEQA. It is disingenuous for the RDEIR to attempt to compare the LRDP’s GHG emissions against an “imaginary” project alternative where housing is not provided. Thus, the true impact of GHG emissions on the current environmental setting is still not disclosed in the RDEIR, does not meet the requirements of a sufficient EIR under CEQA and will require revision and recirculation, again.

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9 CEQA Guidelines §15125.
10 CEQA Guidelines §15125.
Third, the RDEIR uses an incorrect significance threshold for GHG emissions. The RDEIR incorrectly uses three thresholds for significance, described on p. 4.2-55, which include: 1) a 30% reduction from BAU which corresponds to the AB-32 goal; 2) Residential Transportation Performance Standard; and, 3) consistency with CARB’s 2008 Scoping Plan.

Recent scientific reports confirm that human activities are a major cause of climate change and that global warming poses a serious threat to the health, natural resources, economic well being and environment of California. In response, Assembly Bill 32 (AB 32), the California Global Warming Solutions Act, was passed in 2006 to require the State to reduce greenhouse gas emissions to 1990 levels by 2020. This mandate is equivalent to a 25% emissions reduction from current levels. Therefore, any new project under CEQA would need to be carefully scrutinized to assess whether or not it would comply with this mandate.

Any new GHG emissions must be considered significant. This is consistent with the “zero emission threshold” identified by CAPCOA (CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, CAPCOA, January 2008). A zero emissions threshold is also used by the California State Lands Commission. Moreover, several recent scientific reports now reveal that the AB-32 targets are already out of date and that we need to reduce our GHG emissions even further, thus providing clear scientific evidence to support a zero emissions significance threshold as necessary.

The RDEIR fails to disclose the proposed LRDP’s impact on climate change.

The RDEIR must disclose specific impacts of adding to global climate change, including rising temperatures, increased droughts, shifting habitats, loss of species and biodiversity, increased severity and frequency of storms and extreme weather events, famine, increases in pests and diseases, sea level rise, flooding, etc.

An EIR must contain a “detailed statement” of all significant effects on the environment of the proposed project. In addition, an EIR must analyze and disclose any irreversible effects

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12 Health and Safety Code § 38500 et seq.
13 Technical Advisory: CEQA and Climate Change, Governor’s Office of Planning and Research (June 17, 2008).
14 See, Draft EIR for the Expansion of Offshore Oil and Gas Development and Onshore Pipeline Development Project) Santa Barbara County (Venoco Inc.); and Venoco Ellwood Marine Terminal Lease Recirculated DEIR.
The emission of greenhouse gases and resulting climate change will cause irreversible harm in California and around the world. The IPCC, Union of Concerned Scientists, and the California Climate Change Center have published several studies that identify how climate change will affect the environment. These impacts include an increase in water temperatures, rise in sea level, reduction of the Sierra snowpack, increase in intensity of storms, changes in ecosystems, and increase in heat waves, ozone formation, and the potential for wildfires. These impacts must be disclosed in the RDEIR.

The RDEIR fails to analyze the LRDP’s cumulative impacts on climate change

The RDEIR must evaluate the cumulative impacts relating to the Project’s greenhouse gas emissions and the resulting contribution to climate change. In a case such as this, where the existing environmental problems are severe, the threshold for determining that a project’s contribution to a cumulative impact is significant is that much lower. Therefore, the RDEIR must fully disclose and analyze the Project’s cumulative impact on global climate change.

The RDEIR failed to evaluate the impacts of global climate change on the LRDP.

The RDEIR must also analyze the potential effects of increased climate change on the Projects, in terms of sea level rise, increased coastal erosion and blufftop retreat, and other potential impacts. Scientific data reveals that sea levels will rise from a fairly modest sea level rise. According to this data, UCSB is part of a vulnerable population to a 100-year coastal flood with a 1.4 meter sea level rise.

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19 Union of Concerned Scientists. 2006. California Global Warming Impacts and Solutions, available at http://www.ucsusa.org/clean/california/ca-global-warming-impacts.html. California Climate Change Center reports include: Baldocchi and Wong, 2006; Battles et al., 2006; Cavagnaro et al., 2006; Cayan et al., 2006a; Cayan et al., 2006b; Cayan et al., 2006c; Drechsler et al., 2006; Franco and Sanstad, 2006; Fried et al., 2006; Gutierrez et al., 2006; Joyce et al., 2006; Lenihan et al., 2006; Luers et al., 2006; Luers and Moser, 2006; Medellin et al., 2006; Miller and Schlegel, 2006; Moritz and Stephens, 2006; Vicuña, 2006; Vicuña et al., 2006; Westerling and Bryant, 2006.
21 Attachment D, California Climate Change Center, The Impacts of Sea-Level Rise on the California Coast, March 2009.
22 Attachment E, Id. maps found at http://www.pacinst.org/reports/sea_level_rise/tmap.html.
B. Population and Housing

The RDEIR underestimates impacts to Population and Housing

Indirect growth resulting from the LRDP is underestimated. Indirect growth in the region is derived from the ripple effects of increased campus population and University expenditures on the job market in the region. Indirect growth resulting from the LRDP will produce housing demand greater than supply. This indirect growth derives from the need to replace retiring faculty and staff with new hires, many of whom will come from outside the region and with families. This effect must be analyzed in the RDEIR.

The RDEIR fails to adequately mitigate impacts to housing

The RDEIR discloses that housing development may not keep pace with enrollment and that this is a significant impact. The mitigation proposed to decrease this impact proposes to provide housing for new students with a “lag” as much as 4 years after the students arrive. Further components of the “mitigations” identified in POP-3A provide for crowding and substandard accommodations for students if there is a significant lag between enrollment increases and provision of new housing for those increases. The proposed LRDP as currently crafted will guarantee that there will be a lag time between enrollment and housing.

Moreover, the language used to bind the University to provide for these mitigation measures is weak and effectively unenforceable, in violation of CEQA. For example, POP-3A states only that the University “shall work toward achieving the following housing development goals” of decreasing the lag time to 4 years. The only binding “mitigation” identified in POP-3A in the certain event of a housing shortfall allows the University to: 1) increase per room occupancy in the existing residential facilities; 2) “seek” off campus housing opportunities in motels and apartment complexes; and/or 3) temporarily convert lounges to bedrooms. Not only do these mitigation measures fail to lessen the impacts to housing, but they promise to cause additional impacts. These mitigation measures have the potential to cause significant environmental impacts to air quality, water, and traffic that have not been disclosed in the RDEIR – as required by CEQA Guideline §15126.4(a)(1).

The RDEIR fails to consider effective measures that will avoid or lessen impacts to housing.

The RDEIR fails to propose and examine the one mitigation measure that will feasibly reduce impacts to housing and population - to pace enrollment growth to follow rather than precede development. UCSB should develop housing prior to growth increases.

A reduced growth plan should have been examined with respect to housing. Indeed, it would appear evident that a reduced enrollment target coupled with fulfillment of the LRDP’s housing projects would make a substantial positive impact on the area’s housing
supply. If UCSB made housing available to its existing and replacement faculty and staff, and a student population that was smaller than that projected in the LRDP, it would be significantly reducing pressure on the regional housing supply, and reducing its impact on transportation and circulation as well.

Another measure that should be explored would be to add no new enrollment but to add housing to meet requirements and mitigation goals of the 1990 LRDP in reducing current impacts such as those on the environment, water use, road capacity and air pollution.

The RDEIR is required by CEQA to propose mitigation measures that lessen impacts and has clearly failed to do so for impacts to housing and population.

C. Transportation and Circulation

The RDEIR’s assessment of impacts to Traffic and Circulation is deficient and inaccurate because it omits critical information.

- There seems to be no discussion about traffic impacts of students, employees and spouses commuting from UCSB Housing to school, work, or play away from UCSB, especially at roads and intersections that were not studied in the RDEIR. The RDEIR states that, “Providing on campus housing for all LRDP enrollees…would greatly reduce if not eliminate “trips to campus” which we feel is grossly inaccurate, especially in light of the fact that a large proportion of the new enrollees will be graduate students, who often have families.

- There seems to be no discussion about assumptions regarding traffic increases due to large number of people added to the community to serve new students, faculty and staff – nurses, plumbers, dry cleaners, etc.. These additional people will be either living in the South Coast or commuting from North and South. What “multiplier effect” – the ratio of people required in the community to serve UCSB incremental students, faculty and other employees – is the RDEIR based on?

The mitigation proposed in the LRDP lacks sufficient detail, is unenforceable and ineffective in lessening impacts to Transportation and Circulation.

- Under mitigation measures, the RDEIR switches to using the passive voice, with no clarity about who would be doing the monitoring, the timetable, the funding, etc. lacking necessary information and rendering it unenforceable.

- Many of the mitigations require funding. Given that California is currently facing current and future budgetary deficits and balancing its budget through massive borrowing from future revenue sources – lottery, bonds, etc. – there seem to be no guarantees that there will be funding for the mitigations.
Without funding the mitigation proposed is merely speculative and will fail to lessen impacts.

- Similarly, some of the mitigations depend on actions of others such as MTD, which also has budget challenges. History suggests that mitigations have not been fulfilled in the past. For example, conditions of approval for the Costco Shopping centers, shuttles to Old Town Goleta and UCSB, never took place.

The following are feasible mitigation measures that can lessen impacts to parking and traffic and must be analyzed in the RDEIR.

a. Parking
   - Create an ongoing program to give cash “rebates” to students and faculty who do NOT request a parking space.
   - Lease/create remote parking space away from Campus, such as near otherwise unbuildable freeway areas or underutilized parking lots, with shuttles to and from campus.
   - Make parking free for faculty and staff willing to share a single space.
   - Make parking free for motorcycles, as it is for bikes.
   - Create an IV Residential parking permit program in a way that does not conflict with the Coastal Act and impede access to coast.

b. Public Transit
   - Use scanners on buses to record who is using them. Give “frequent flier” miles with some rewards for reaching certain levels of use. Same for Van Pools.
   - Create a UCSB Shuttle for campus and outlying UCSB housing.
   - Increase number of bus stops on campus (both Shuttle and MTD).
   - Cover bus stops from sun and rain.
   - Provide MTD passes to faculty/staff (currently discounted) as 59% of faculty/staff living on campus commute by SOV.
   - Expansion of TAP services to include increased car share service both on the main campus and at strategic University housing locations.
   - Provide shuttle service to Calle Real shopping to help reduce trip generation from campus.

c. Actions to Better Manage Peak Hour Traffic
   - Change class schedules away from peak traffic hours.
   - Offer Faculty and staff flex time away from peak traffic hours.
   - Encourage Telecommuting for Faculty and Staff.
   - Create greater incentives for students to attend summer quarter.
   - Offer more classes on weekends, away from peak days.

d. Encourage Biking
   - Cover Bike racks from the rain.
• Implement Bike station on campus to provide facilities like showers, secure locking facilities and tools for those with a longer commute to campus.
• Have locking racks on the racks themselves that better reduce bike theft.
• Provide more bike lockers for those who are interested in having a more secure place to store their bike as faculty and some students may have more valuable bikes
• Lease bikes to students, faculty and staff for nominal charge (with a deposit so they are returned). This reduces the barriers of buying and selling bikes and storing them between terms.
• The 5 new connections to campus through Ocean Road should be implemented for bikes, pedestrians, public transit and emergency vehicles

e. Reduce Use of Private Cars
• Restrict cars for freshmen and sophomores (at a minimum) living on campus; and increase enforcement of existing program. Numerous campuses (including UCSC, UCD, and UCB) have found success in these programs
• Explore pricing mechanisms/regulations to reduce car use. e.g. If one parking space is provided for each faculty/staff housing unit, any second space will be significantly more expensive, and cost alternatives are provided such as Zip car/transit option.

D. Water

The RDEIR’s impact analysis is flawed because it overestimates the amount of water available to support the proposed LRDP, and underestimates the amount of water that will be required by the LRDP.

• According to the GWD, the RDEIR’s assessment of water supply is inaccurate and an overestimate of water available to support the LRDP.23 The RDEIR must accurately describe the environmental setting, which in this case includes the amount of water available to support the project. This provides the baseline for which impacts are assessed. This error will skew the impact analysis and effectiveness of proposed mitigation. The RDEIR must revise its water supply data, and disclose the true impacts of the LRDP on water supply.

• The GWD also concludes that the University’s water demand figures are underestimates.24 As a result, the RDEIR fails to accurately disclose the impacts to water, the impacts are underestimated and the mitigation measures are not sufficient to lessen the impact to the maximum extent feasible. The RDEIR must correct this error, which is significant new information and must trigger recirculation as required by CEQA.

24 Id.
It does not appear that the RDEIR sufficiently takes into account the possibility of a long drought in this area.

The RDEIR does not take into account foreseeable future projects that would require water. For example, projects currently seeking or having received partial approvals include Bacara Expansion, Haskell’s Beach Housing and Shelby Ranch and are not considered in the RDEIR. Also not considered in the RDEIR are Bishop Ranch and the Glen Annie Golf Course, both of which could be rezoned for massive housing by 2025.

The RDEIR fails to disclose impacts caused from mitigation measures.

The RDEIR states in proposed mitigation measure W-3G that if sufficient water supplies cannot be acquired then the University shall halt development. If development is halted before sufficient housing can be built on campus to accommodate the enrollment increases, then significant impacts to Air Quality, GHG emissions, Housing, and Traffic will result from this mitigation measure. CEQA Guidelines § 15126.4(a)(1)(D) require the RDEIR to analyze and disclose significant impacts created from mitigation measures.

The RDEIR must discuss feasible measures to mitigate impacts to water.

These include the following:

- Add fewer students, faculty and staff

- Undertake significant water conservation measures within UCSB, beyond those mentioned in the RDEIR’s Mitigations including Recycled water use expansion at all campus sites. Water conservation can save substantial amounts of water. For example, a report for the Massachusetts Executive Office of Energy and Environmental Affairs calculated that an office with 1,000 men equipped with waterless urinals could save 1.56 million gallons of water annually. One acre-foot of water is 325,850 gallons, thus almost 4.8 AFY. Some calculations are needed for water savings with “state of the art” technology. Certainly this technology can improve during the build-out of the LRDP.

  1) Looping of “dead end reclaimed water lines to improve reliability. This was mentioned in the DEIR as a means of improving reliability but was not proposed as part of the LRDP. It should be.

  2) Extend recycled water lines to all campus sites; probably lines are not in place to the Devereux School site, the Storke Family Housing or North Campus housing. The 90% landscaping use of recycled water can be expanded to 100%.

  3) Use of recycled water for toilets should be re-evaluated, and the offset of potable water use calculated.

- Fund water conservation measures on the south coast, particularly, but not limited to, efforts of the Goleta Water District.
- Fund new water sources such as rain runoff cisterns for use on campus
- Fund a water reclamation/re-use facility that would recycle virtually all water used on campus
- Employ aggressive water efficiency efforts for all new construction, and retrofit of existing buildings. Examples would be waterless urinals, which have been installed in some locations on campus.

**Additional Comments**

- The RDEIR contains an inadequate assessment of the impact of a drought year on surface water supplies. The average surface water supply buffer from 1994 to present is not necessarily the buffer that would actually be available from a not-so-average critical drought year. A more accurate prediction of available water supply is from a table created by Steve Mack, Water Supply Manager, City of Santa Barbara on October 30, 2003, using information provided by the then General Manager of the Goleta water District, Kevin Walsh. Steve Mack’s data shows that only 11,325 AF would be available to the Goleta Water District in a critical drought year, not ~17,000 AF stated in the DEIR.

### Water Supply And Demand – Goleta Water District

<table>
<thead>
<tr>
<th></th>
<th>Normal (acre-feet per year)</th>
<th>Critical Drought Year</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Supplies</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cachuma Project</td>
<td>9,321</td>
<td>3,750</td>
<td>Fixed percentage of Cachuma Project yield; Cachuma represents about 55% of total supply</td>
</tr>
<tr>
<td>State Water Project</td>
<td>4,500</td>
<td>3,725</td>
<td>SWP Table A amount is 7,000 AFY plus 450 AFY of CCWA drought buffer. The District assumes 51-80 percent average annual delivery of Table A amount and drought buffer. The District’s right to CCWA facility capacity is 4,500 AFY.</td>
</tr>
<tr>
<td>Local groundwater</td>
<td>2,350</td>
<td>2,350</td>
<td>District’s portion of the Goleta Basin. Safe yield estimated at 3,410 AFY.</td>
</tr>
<tr>
<td>Recycled water project</td>
<td>1,500</td>
<td>1,500</td>
<td>Approximate capacity of built out project. Current production is approximately 1,000 AFY.</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>17,671</td>
<td>11,325</td>
<td></td>
</tr>
</tbody>
</table>

**Demand**

|                          |                               |                       |                                                              |
| Current (2000)           | 14,000                        |                       | Includes approximately 1,000 AFY of recycled water           |
| Planned Future (2020)    | 17,300                        |                       | Includes approximately 1,500 AFY of recycled water           |

Regarding recycled water consumer, the Glen Annie Golf Course currently uses about 20% of the recycled water produced locally. They are considering plans to dismantle the golf course to build housing or other non-golf course uses. This could decrease demand for recycled water and increase demand for potable water.

The Sustainability Plan for Water (SP-9: Water, page 4.2-51) has goals that include:
1) Creating a water management plan
2) Reducing potable water use from off campus by 15% (1-3 yrs) and 25% (3-5 yrs).
3) Increasing reclaimed water use by 15% (1-3 yrs) and 25% (3-5 yrs)
4) Implementing water efficiency strategies for the campus based on a new water management plan.

These are very ambitious goals, and meeting them would require following the recommendations outlined above.

The Long-term goals depend on “on-site generation” of potable water. The mechanism is not mentioned, but desalination comes to mind as the only likely mechanism. Given environmental and cost issues associated with desalination, SUN opposes desalination.

E. Stormwater

General Comments

UCSB Campus Planning and Design is proposing an immense program of infrastructure upgrades. Campus wastewater is treated at the Goleta Wastewater Treatment Plant, which is operated by the Goleta Sanitary District (“GSD”). Heal the Ocean, a member of SUN, was instrumental in the campaign for the upgrade of the Goleta Sanitary District Wastewater Treatment Plant to full secondary levels, and GSD is in the process of engineering and construction to be completed five years from now, by 2014. We are familiar with GSD’s designed capacity, as well as the relationship of GSD to Goleta West Sanitary District (“GWSD”), which uses GSD’s facility and ocean outfall for wastewater discharge.

The RDEIR cites dramatically increased wastewater flows from both GWSD and GSD, yet maintains that no mitigation is necessary, and further engineering work or Environmental Impact Report (EIR) is not required. SUN strongly disagrees. The RDEIR (4.14-25 Clean Water Act) states, “The University is responsible for compliance with regulations associated with the Clean Water Act and any other applicable federal environmental laws regarding location, type, planning, and funding of facilities.” The Clean Water Act sets forth federal water quality standards that apply to sanitary sewer service, and the expected
population increase at the University is guaranteed to have a profound impact on the sanitary sewer collection system. The LRDP exceeds wastewater treatment requirements of the applicable Regional Water Quality Control Board (“RWQCB”), and is considered significant under CEQA’s Guidelines.

The RDEIR Underestimates Impacts to Wastewater by Relying upon Inadequate Mitigation Measures that are Uncertain, Not Under the Control of the University and Unenforceable.

The RDEIR (4.15-11) states, “The Goleta Sanitary District and Goleta West Sanitary District Land Use Survey/Wastewater Generation Projections Study 2006 Update (Dudek and Associates, Inc., 2006) quantifies future wastewater flow through both the GSD and GWSD systems associated with buildout of land uses within their service areas other than the University.” Based on the Dudek study the RDEIR (4.15-13 and Table 4.15-5) states the following:

- “Cumulative wastewater flows for the GSD will fall within the treatment plant’s design capacity, but will exceed the remaining National Pollutant Discharge Elimination System (NPDES) capacity at buildout of other land as well as buildout of that portion of the 2008 LRDP that falls within the District;
- “Cumulative wastewater flows associated with UCSB will exceed the University’s remaining share of the treatment plant design capacity and remaining share of NPDES permit capacity at buildout of the 2008 LRDP.”

The LRDP Impact WW-1 (4.15.2.3 2008 LRDP Impacts and Mitigation Measures) states that the “implementation of the 2008 LRDP will increase wastewater flows to the Goleta Wastewater Treatment Plan via conveyance systems owned by the University, GSD and GWSD. Buildout of the 2008 LRDP, along with the buildout of projected development within the service areas of the three agencies would result in the following:

- “The total design capacity of the treatment plant would not be exceeded;
- “The portion of the total design capacity of the treatment plant owned by the University would be exceeded;
- “The permitted capacity owned by the University under GSD’s NPDES permit would be exceeded;
- “The portion of the total design capacity of the treatment plant owned by the GSD would not be exceeded;
- “The permitted capacity owned by GSD under GSD’s NPDES permit would be exceeded;
- “Neither the treatment plant design capacity nor the permitted capacity owned by the GWSD under the GSD’s NPDES permit would be exceeded.”

The LRDP Mitigation WW-1A (4.15.2.3 2008 LRDP Impacts and Mitigation Measures) states:

- “The University will request that the GSD and GWSD apply to the RWQCB to modify or re-issue each District’s National Pollution Discharge Elimination Permit for the wastewater treatment plant as necessary to accommodate the average annual enrollment growth rate for the University.”
The LRDP Mitigation WW-1B (4.15.2.3 2008 LRDP Impacts and Mitigation Measures) states:

- “The University will negotiate the acquisition of additional design capacity in the GSD wastewater treatment plant as necessary to accommodate the average annual enrollment growth rate.”

The GSD and GWSD must acquire a re-issued NPDES permit for the wastewater treatment plants to accommodate for the population growth of the University before the LRDP is approved. The RDEIR states that the GSD commented on the Draft EIR which states (4.15-14), “(GSD) does not believe that it is prudent to sell any of its remaining treatment plant capacity based on the projection of future capacity in the January 2006 Dudek and Associates report.” The RDEIR does not state if GWSD intends to sell treatment plant capacity to the University. The University cannot assume GSD and/or GWSD will sell additional treatment plant capacity to the University to accommodate the population growth. It is the responsibility of the University to finalize negotiations with GSD and/or GWSD to buy additional treatment plant capacity before the LRDP is approved and to follow CEQA guidelines as it pertains to the environmental impact the LRDP is initiating.

IV. The Alternatives Analysis is Flawed and Fails to Meet the Criteria Set Forth in CEQA.

The Alternatives analysis is essential to ensure compliance with the substantive requirement of CEQA, which is to avoid or lessen the environmental impacts of a proposed project. “The core of an EIR is the mitigation and alternatives sections”; alternatives should “offer substantial environmental advantages over the project proposal.”

The Alternatives analysis is flawed in two critical respects, discussed below: 1) the RDEIR added significant new information to the DEIR’s impacts yet failed to revise the Alternatives analysis; and, 2) it fails to identify an adequate range of alternatives that would lessen environmental impacts in a meaningful way;

_The RDEIR failed to revise the Alternatives analysis to reflect the significant new information added for five new impact areas._

The RDEIR added significant new information to the DEIR’s impacts in five critical impact areas, yet failed to revise the Alternatives section and disclose the impact of that new information on the comparison of alternatives. Thus, the Alternatives section in the DEIR is inadequate because it is based on incorrect and outdated information for impacts to Air Quality, Population and Housing, Traffic and Circulation, and Water and Wastewater, and the resulting analysis and conclusions are therefore incorrect.

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25 CEQA Guidelines §15126.6, emphasis added.
The RDEIR failed to identify an adequate range of alternatives that could lessen the environmental impacts of the LRDP.

The DEIR offers an inadequate range of alternatives, and fails to have any alternatives that offer “substantial environmental advantages over the project proposal.” For example, although the Reduced Enrollment Alternative was deemed the environmentally superior alternative in the DEIR, it still had significant impacts to air quality, population and housing, and many of the same impacts to water quality, biology, land use, traffic and circulation that rely upon the same inadequate mitigation measures that are attributed to the proposed LRDP.

The RDEIR must consider alternatives that would reduce impacts.

In order to provide a meaningful alternative that would reduce many of the significant impacts identified as a result of increased growth at UCSB, the RDEIR should consider the following suggestions and either include them in an alternative or provide an analysis as to why they are not feasible under CEQA.

1. Any growth planned by UCSB must be conditioned on the following:
   - UCSB must audit and make available its findings as to the mitigations required in the 1990 LRDP and whether they were completed or not, plus whether they achieved the mitigation they were designed to accomplish.
   - UCSB must complete any 1990 mitigations that were not completed. In addition, UCSB must mitigate any impacts that were either underestimated or for which the mitigations were not fully effective in accomplishing what they were designed to do.
   - Mitigations must be made before growth and its impacts occur. Mitigations must not trail the impacts they are designed to mitigate.

2. UCSB’s future mitigations should result in improving the situation and reducing impacts in the community – many of which it is responsible for creating – not just march in place.

Whatever growth alternative is proposed, UCSB must include mitigations greater than the amount that would merely offset the impacts of that growth. If there are insufficient funds for actions required to mitigate the growth UCSB proposes, the only alternatives to be explored are those that reduce growth and not reduce funding for required mitigations.

Three key examples in this regard are:

   a) Housing: UCSB must develop housing that helps reduce its existing as well as future impact on the regional housing supply and to improve the region’s jobs/housing balance.
b) Transportation: UCSB must plan from the outset to reduce private automobile use by students and staff. This goal should be intrinsic to the LRDP.

c) Water: UCSB must take actions to significantly reduce water consumption and increase conservation. Water – a very precious, shared and finite resource - is already in short supply and will not support UCSB’s current proposal. In addition, our water supply is subject to rather severe fluctuations when droughts occur and any alternative must anticipate the eventuality of drought.

3. **RDEIR should examine the alternative that enrollment growth be planned to follow rather than precede development.**

4. A reduced growth plan should have been examined with respect to housing. Indeed, it would appear evident that a reduced enrollment target coupled with fulfillment of the LRDP’s housing projects would make a substantial positive impact on the area’s housing supply. If UCSB made housing available to its existing and replacement faculty and staff, and a student population that was smaller than that projected in the LRDP, it would be significantly reducing pressure on the regional housing supply, and reducing its impact on transportation and circulation as well.

5. Another alternative that should be explored would be to add no new enrollment but to add housing to meet requirements and mitigation goals of the 1990 LRDP in reducing current impacts such as those on the environment, water use, road capacity and air pollution.

6. Another alternative is to increase “remote learning”, requiring fewer people to come to campus.

V. The RDEIR Fails to Consider Cumulative Impacts.

CEQA section 21083 states: “the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probably future projects.”

Section 15355 of the CEQA Guidelines states:
The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

*The RDEIR fails to consider the impacts of the Isla Vista Master Plan.*
Each plan is enormous in its scope. The timing of the construction and phasing of each is critical. The cumulative impacts of the noise, air and water pollution, water use and
traffic during the construction phase varies a great deal depending on whether they proceed in series or in parallel time frames.

There is a very strong inter-relationship between developments in these two areas, as acknowledged, but not fully fleshed out by UCSB. For example, UCSB has repeatedly and publicly stated that it would implement a policy to bar freshman and possibly sophomores from owning a car, but only if IV had a permit parking program. Without such a program, UCSB alleges that people barred from car ownership would simply park their car in IV.

Similarly, if a parking permit program is instituted in IV, UCSB has not taken into account potential impacts in the surrounding areas. For example, people currently living in IV or on campus may park their cars in non-IV and non-campus locations, increasing traffic and parking burden in the surrounding Goleta Valley.

Though UCSB states that their RDEIR takes into account all the development outlined in the IV Master Plan, this is at odds with reality. There are major decisions still to be made on the amount, timing and location of development in IV. Since much IV redevelopment depends on private funding, it is impossible to know at this time when and to what extent IV redevelopment will occur. Similarly UCSB has acknowledged that it is unsure when it will receive funding for the development contained in the LRDP. Without knowing the timing and extent of the build out of each development plan, the cumulative impacts and the required mitigations cannot be adequately addressed.

The LRDP contains at least 50,000 square feet of commercial development on UCSB campus at Ocean Road alone, right on the campus border with Isla Vista. The RDEIR grossly underestimates the effects on current and future businesses in IV and the resulting impacts both from IV residents traveling to campus businesses and vice versa.

The LRDP carries impacts on IV and campus that have not fully been assessed, such as: the elimination of the Pardall Tunnel, the opening of numerous IV roads to car traffic, access points that today carry only bike and pedestrian traffic and end at Ocean Road.

The cumulative of impacts of housing supply, water use, wastewater, traffic, public safety and parking resulting from massive development in these two contiguous, densely populated areas can only be determined if their development plans and schedules are carefully studied and integrated. This information must be fully addressed under cumulative impacts in the RDEIR.

The RDEIR must account for development and its impacts from other jurisdictions.

- Isla Vista (County)
- County of Santa Barbara for its own building or facilities
- The City of Santa Barbara projects for its own building/facilities, such as those related to the airport.
• The City of Santa Barbara owned land (developed by developers) in areas around UCSB or even farther away. For example, some Santa Barbara City development may require water and MTD, resources shared with UCSB.
• The Federal Government facilities – military or post office or other.
• California State Government – National Guard or other
• CalTrans

Several projects in Goleta have not been accounted for in this RDEIR. These include: Bacara expansion, Haskell’s Landing, Glen Annie Housing, and Shelby. Also, when the Goleta General Plan is redone around 2020, there is a good chance that some or all of Bishop Ranch will be re-zoned for significant commercial or residential development.

VI. Conclusion

The RDEIR concludes that the proposed LRDP will result in eighteen significant and unmitigated impacts to air and water quality, housing, transportation and wastewater. These impacts will degrade our environment and negatively impact our coastal economy. In addition, the proposed LRDP will result in unmitigated levels of greenhouse gas emissions that will contribute to global warming and interfere with UCSB’s goals for sustainability.

In summary, the RDEIR fails to meet CEQA’s basic requirements for a legally sufficient EIR. The DEIR and RDEIR must be revised and recirculated again to include new and significant information about the project description, impacts, mitigation measures, and alternatives, as described above, for public review and comment.

Thank you for this opportunity to comment on the RDEIR. Please do not hesitate to contact me at (805) 698-5164 with any questions or for clarifications.

Respectfully submitted.

Alicia Roessler
Attorney
Response to Comment R-21-1. This comment summarizes the commenter’s letter. The detailed comments are responded to individually, below.

Response to Comment R-21-2. The DEIR explains its methodology for determining Campus population on page 3.0-1. As stated in that discussion, enrollment levels are determined by a Fall-Winter-Spring average headcount. Headcount in turn is the number of students enrolled on campus. Students not attending classes on campus, such as study-abroad students, are not included in the headcount. As further explained on DEIR page 3.0-1:

“The 2010 LRDP presents a comprehensive framework for the physical development of the UC Santa Barbara campus to accommodate an enrollment level of up to a Fall-Winter-Spring average of 25,000 headcount (as distinguished from full-time equivalent (FTE) students), and a total of approximately 6,400 faculty and staff using academic year 2025 as the planning time frame. [...] FTE represents the equivalent of one person taking a full load of classes. Thus, two part-time students might equal one FTE. This is distinguished from “head count” which is the total number of students on campus, irrespective of their study load. Knowing headcount is important for determining how many people are on campus, thus informing the estimates of vehicle trips, water use, and other requirements based on population. FTE is important in institutional planning, as it is used to determine the demands for classroom space and instructors. (UCSB Office of Budget and Planning, 2006).” [emphasis added]

Response to Comment R-21-3. Regarding the pace of enrollment and employment growth, please see Master Response – Population and Housing. As explained above, the RDEIR uses on-campus headcount to determine Campus population. This accounts for the categories listed in the comment. The LRDP does not include a “cap” limiting enrollment growth. Several mitigation measures, including POP-3A and W-3G, tie development to enrollment growth in order to minimize environmental impacts.

Response to Comment R-21-4. The LRDP is a development program, and the EIR analyzes its impacts at a programmatic level. The EIR does not inappropriately defer mitigation. It identifies mitigation measures at a program level, and provides performance standards that they must meet in order to reduce or avoid impacts. As specific projects are proposed, they will be subject to environmental review under CEQA and applicable project-specific mitigation measures will be identified, refined, and adopted where appropriate.

Response to Comment R-21-5. The measures identified by the commenter are LRDP policies, not mitigation measures. LRDP policies are general, programmatic guidelines. They are not intended to mitigate specific environmental impacts.

Regarding the Storke Wetland sewer lines, please see response to comment I-36-15.

Regarding bicycle and pedestrian infrastructure, please see responses to comments I-44-8 and I-44-10G.

Regarding transit planning, please see responses to comments A-12-48 and A-13-1.

Response to Comment R-21-6. Regarding the reduced enrollment alternative, please see response to comment I-9-5.
Regarding transportation planning, such a measure is already identified. Please see responses to comments A-12-48 and A-13-1.

Regarding green building, impacts related to energy demand are addressed in Impact UTIL-3 (DEIR at 4.16-19) and would be less than significant. No further mitigation is required.

Response to Comment R-21-7. The measures that are discussed on RDEIR page 4.2-59 are described in the notes to Table 4.2-20. Please see the notes in that table for an explanation of the assumptions and methodology used for calculating LRDP GHG emissions.

Response to Comment R-21-8. RDEIR Table 4.2-18 describes the Campus’s GHG emissions in 2007; this description is the best available estimate of the environmental setting at the time of the preparation of the RDEIR, as required by CEQA Guidelines § 15125(a). In determining whether the LRDP will make a cumulatively considerable contribution to global climate change, the RDEIR compares the GHG emissions attributable to development under the LRDP to the emissions that would result from a business as usual scenario in which LRDP development proceeds without the provision of on-campus housing for additional students and employees. AB 32, which mandates California’s emissions reduction program and is the source of the RDEIR’s standards of significance, defines its goals in comparison to a “business as usual” scenario, and not in comparison to emission levels at the time of its enactment. The RDEIR’s calculation of the LRDP’s incremental impact is thus appropriate and recirculation is not warranted.

Response to Comment R-21-9. The standards used in the RDEIR are consistent with and derived from the standards and goals adopted by the California Legislature, by the California Air Resources Board (the agency charged with administering the state’s GHG emissions reduction program), and the California Air Pollution Control Officers Association, and are therefore appropriate for determining the significance of the LRDP’s contribution to global climate change.

Response to Comment R-21-10. The RDEIR summarizes the impacts of global climate change on page 4.2-43, and analyzes the projected GHG emissions attributable to the LRDP through section 4.2.3. A detailed discussion of the wide-reaching consequences of this worldwide phenomenon, and of the RDEIR’s specific contribution to those impacts, is outside the scope of this EIR.

The DEIR considers the risk of flooding beginning at page 4.7-12, and coastal bluff erosion beginning at page 4.5-6. Sea level rise and other effects of global warming may increase the magnitude of such risks, but it will not change them in kind. Thus, mitigation measures and LRDP policies will be sufficient to protect Campus development regardless of sea level rise.

For example, LRDP policies protect new development from bluff erosion: Policy GEO-7 requires that new development take place far enough from bluff faces that it can be maintained for at least 100 years without shoreline protection. In implementing this policy, project-level planning and environmental review will need to take into account up-to-date information about erosion rates in order to determine the appropriate siting for proposed new development.

Similarly, with respect to flooding, existing and new policy, as described in the discussion of Impact HYD-5, DEIR at 4.7-41, prevents the Campus from siting structures within a 100-year flood hazard zone. If climate change expands the area at risk from a 100-year flood, these policies will continue to protect new development.

Response to Comment R-21-11. A. Please see response to comment A-10-6.

B. Regarding indirect growth and LRDP Mitigation POP-3A, please see Master Response – Housing and Population. Mitigation POP-3A does not guarantee a lag time between housing and enrollment growth; it sets
a limit on that lag time and includes measures to close the gap should one develop. It is, moreover, binding,
and commits the University to provide housing through means that will minimize physical impacts to the
environment, such as those caused when demand leads to housing construction.

Student housed off-campus during the interim between enrollment increases and housing construction, will
not have impacts related to air quality, traffic, or water supplies beyond those evaluated in the EIR. As
explained in Mitigation Measure POP-3A, students housed off-campus would be housed in existing buildings,
which are already included in the EIR’s calculations. Each of these analyses begins with a baseline based on
existing land uses designations—they determine how much traffic an area will generate, or how much water it
will use, based on that area’s present land uses. The buildings that would be used to house students are thus
already included, because they are part of the existing baseline.

C. Please see response to comment I-44-17C.

Response to Comment R-21-12. The RDEIR’s traffic analysis accounts for all trips generated by the
campus population (to and from campus), including non-commute trips. RDEIR, pages 4.13-55 through -57.

Response to Comment R-21-13. As explained on RDEIR page 4.13-68, the traffic model projections for
cumulative impacts were based on full buildout of the LRDP and the general plans of nearby jurisdictions,
including the City of Goleta and the County. Any population growth related to the LRDP would have to be
accommodated within these jurisdiction’s current land use constraints and, therefore, is captured by the
model’s projections.

Response to Comment R-21-14. Throughout the RDEIR, where mitigations, such as traffic improvements,
are within the responsibility and jurisdiction of another jurisdiction, the relevant impact is considered
significant and unavoidable, even if the mitigation would, if implemented, reduce the impact to a less than
significant level. This is because such measures would, ultimately, be outside the control of the University to
implement. However, such mitigation measures commit the University to work with the relevant jurisdictions
on implementing the improvements and to contribute its fair share of the cost of improvements or any other
form of support mentioned. For example, see Mitigation Measure TRAFFIC-2A. RDEIR, pages 4.13-133
through -134.

Response to Comment R-21-15. Regarding the proposal to create a residential parking program for Isla
Vista, please see Mitigation Measure TRAFFIC-10, which commits the University to assist with such a
program.

Regarding other parking proposals, the Campus does not have a parking shortage, as explained on page 4.13-
162 of the RDEIR. Campus affiliate’ decisions to park in Isla Vista is therefore not driven by a lack of space
on Campus, and programs, such as those suggested, to discourage on-campus parking will not have the
desired effect of reducing off-campus parking. In fact, these programs will likely increase parking pressure on
Isla Vista. Please also see response to comment I-8-4.

Regarding public transit, please see responses to comments A-12-48, A-13-1, and R-4-19.

Regarding bicycle planning and infrastructure, please see response to comment I-44-8A.

Regarding proposed restrictions on certain students’ use of cars, please see response to comment I-26-8B.

Response to Comment R-21-16. A. Please see  Master Response – Water Supply sections II, IV, and V and
the responses to comment letter R-13.
The RDEIR analyzes the water supply in both critical dry years and multiple dry years (see RDEIR at 4.14-36 through -38).

Please see Master Response – Water Supply section V.E.

Please see response to comment R-21-11B.

Please see Master Response – Water Supply sections II and VI.D.

The RDEIR's projections of the amounts of water available from the Goleta Water District’s various sources are drawn from GWD’s 2008 Water Supply Assessment, as recommended by GWD. Please see Master Response – Water Supply sections I and IV.

Please see Master Response – Water Supply sections V.A and the response to comment and R-21-25.

The University is actively implementing the Campus Sustainability Plan as described on pages 4.2-46 to -48 of the RDEIR.

Response to Comment R-21-17. The RDEIR concludes that the LRDP will have a significant and unavoidable impact related to the exceedence of the Goleta Sanitary District’s permitted capacity in the Goleta Waste Water Treatment Plant (see RDEIR page 4.15-9).

Response to Comment R-21-18. The RDEIR concludes that impacts to wastewater facilities would be significant and unavoidable, in part because the increase in permitted treatment plant capacity to the University needed to serve buildout of the LRDP is not within the University’s direct control. Based on discussions with the GWSD, however, there is adequate pipeline/pump station capacity to serve buildout of the University in accordance with the 2010 LRDP. Minor infrastructure up-sizing may be required (see Impact WW-2), but the backbone is sufficient. According to Ryan Lodge of the Regional Water Quality Control Board, there do not appear to be any restrictions or impediments to increasing the permitted capacity of the treatment plant in an amount sufficient to serve full buildout of the 2010 LRDP and projected cumulative growth (pers. comm. October 2008).

While the University’s wastewater flow at LRDP buildout is projected to exceed the University’s ownership share of the capacity in the treatment plant, because the treatment plant will still have excess capacity in 2025, the plant will not need to be increased in size. The University will negotiate with GSD and/or GWSD to purchase additional treatment plant capacity. In any event, the treatment plant’s NPDES permitted capacity will need to be expanded to serve new development within the GSD with or without the 2010 LRDP, but increasing the NPDES permit capacity will not involve any physical changes that could have a significant effect on the environment. Any changes would consist of replacing equipment within the existing facility. The University, like any discharger, is otherwise prohibited by law from exceeding the capacity of the treatment plant that is available to it.

Response to Comment R-21-19. CEQA does not require a predetermined length of discussion for alternatives. According to CEQA Guidelines Section 15126.6(a), “there is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.” In addition, the recirculated portions of the EIR do not significantly affect the comparison of alternatives. For example, the Reduced Enrollment Alternative would be the environmentally superior alternative (after No Project) regardless of the technical changes made in the air, traffic, water, and wastewater sections of the EIR. The table on RDEIR page 1.0-4 lists the impacts analyzed in the DEIR and shows those which were revised in the RDEIR.

Response to Comment R-21-20:
CEQA does not require a predetermined number of alternatives. Each alternative has advantages and disadvantages over the main proposal. The reduced enrollment alternative—while reducing much of the severity of impacts from the LRDP as proposed—still involves some significant impacts; however, it would not increase the severity of any impact above that of the primary proposal. The reduced enrollment and virtual university alternatives provide reduced, or the same, levels of impacts. Please see DEIR Table 5.0-1 for more information.

Response to Comment R-21-21. A. As CEQA requires, the RDEIR analyzes and identifies mitigation for the impacts of the proposed project. The impacts of past projects are a part of the existing conditions, against which the LRDP's impacts are compared.

Regarding the Campus’ future water use, please Master Response - Water Supply, section V.B.

B. The LRDP proposes to house all new faculty, staff, and students on campus.

C. See response to comment R-21-15, above.

D. See response to comment R-21-16, above.

E. Please see Master Response – Population and Housing.

F. See response to comment I-44-17C.

G. See response to comment I-44-17C.

H. The EIR analyzes a Virtual University Alternative beginning on page 5.0-28, and concludes that the alternative would fail to meet the Project’s objectives of providing collaborative learning and fostering interaction between students and faculty.

Response to Comment R-21-22. The EIR refers to the Isla Vista Master Plan throughout the document and includes it in the cumulative scenario for applicable impact topics. See Sections 4.3, 4.8, 4.10, 4.12, 4.13, 4.15, and 6.0.

Response to Comment R-21-23. The suggested consequence of an Isla Vista residential parking permit program is unlikely. No other residential area is convenient to the Main Campus, and the Campus lies between Isla Vista and other potential parking areas. Thus, there are no effective alternatives to parking in Isla Vista. Restricting parking there would lead to two outcomes: more use of available on-Campus parking and less use of cars generally. This is why the University, through Mitigation Measure TRAFFIC-10, strongly supports such a program.

Response to Comment R-21-24. The EIR analyses assume that each surrounding jurisdiction, including Isla Vista, jurisdiction built-out to the maximum extent allowable by the applicable land use plans. Moreover, these analyses consider the LRDP’s impacts on the region, including Isla Vista, in all of the impact areas the commenter lists.

Response to Comment R-21-25. All the projects listed by the commenter, except the Glen Annie housing project and Bishop Ranch, were not included in the 2006 Goleta General Plan and therefore were factored into the DEIR and RDEIR’s analyses of water usage, traffic, and other relevant factors in order to provide a complete cumulative scenario appropriate to the time the EIR was prepared.

Subsequent to the notice of preparation for the LRDP EIR, the City of Goleta initiated a series of amendments to its General Plan. Environmental review of these amendments included consideration of the
Glen Annie housing project, but was not complete at the time of the preparation of the RDEIR. This project, therefore, was not factored into the cumulative scenario for the 2010 LRDP EIR, as it was not reasonably foreseeable at the time the DEIR and RDEIR were prepared.

At this time, current land use plans do not include development of Bishop Ranch. The DEIR and RDEIR therefore do not include any such development in their calculations.
Thank you for your comments/questions regarding the UCSB Long Range Development Plan. Your correspondence will be entered into the record and addressed within the formal response that will follow after the public comment period closes on 3/31/2009. If you would like to receive notice of future meetings and/or report releases and are not currently on our mailing list, please register on the project Web site, http://www.ucsbvision2025.com/contact.html. We appreciate your interest in UCSB.

-----Original Message-----
From: ruizsblaw@cox.net [mailto:ruizsblaw@cox.net]
Sent: Saturday, March 28, 2009 6:57 PM
To: info@UCSBVision2025.com
Cc: LaurenHanson@cox.net; ffarina@cox.net; ruizsblaw@cox.net; eford@goletawater.com
Subject: UCSB LRDP Re-Circulated DEIR Formal Comment

I submitted a Comment Letter to the DEIR dated May 21, 2008. I understand from your Notice that you will thoroughly respond to all my points made in that Letter, in your Final EIR. Clearly the Re-Circulated document did not effectively or adequately respond to many or most of the comments made in my Letter. I look forward to your responses.

I have reviewed the Comment Letter submitted by the Goleta Water District to the Re-Circulated document. The District has done a fine job of responding to the document. As a matter of law you could choose to disregard my comments although I clearly qualify as an expert on local water and land use and I am an expert in CEQA, and CEQA does require that you give extra consideration to the opinion of experts. You cannot as a matter of law ignore the opinion of a Responsible Agency. Staff should understand that you ignore the Goleta Water District comments at the Regents' legal peril. You have written an EIR that is clearly legally flawed in the Water Supply Section and any competent lawyer would be able to successfully prosecute a CEQA lawsuit to demonstrate that fact to the Courts.

You must once again re-write your Water Supply section and do so in cooperation and consultation with the Water District. If you do not I will actively advocate that the Goleta Board of Directors authorize a CEQA lawsuit challenging the EIR. I believe they could do so, of course successfully, but also cost effectively as the document in its current form could be shown to be legally defective with just a basic bares bones effort using District staff and the consultant who assisted the District in writing their Comment Letter. I sincerely hope that does not become necessary. Our time could be much better utilized.

I formally join with the Water District's comments to the Re-Circulated DEIR. We look forward to your response.

Russell R. Ruiz
108 Mesa Lane
S.B., CA 93109
Letter R-22
Russell Ruiz

3/28/2009

Response to Comment R-22-1. This Final EIR contains the responses to comments on both the DEIR and RDEIR. Please see the response to comment letter I-5.

Response to Comment R-22-2. The University consulted with GWD throughout the environmental review process, as described in the response to comment R-13-G1. The water supply analysis in the RDEIR relies on GWD’s 2008 WSA, as recommended by GWD. Please see Master Response – Water Supply section I. The University has reviewed and responded to the comments provided by GWD (see responses to comment letter R-13). Please see Master Response – Water Supply for more information.
March 25, 2009

To Whom It May Concern:

I am writing in regards to the latest LRDP proposed by UCSB, and would like to voice my concerns. I strongly object to the widening of Phelps road.

I feel that by enhancing the public transit system servicing West Goleta to include more routes and more frequent service to UCSB it is a more effective and sustainable long-term solution to UCSB’s traffic impacts. Additionally, completing the widening of El Colegio is a preferable alternative to the Phelps/Mesa connection. One way of limiting increased traffic would be by preventing freshmen and sophomores from bringing cars to campus.

The proposed widening of Phelps Road at the Phelps/Storke intersection is not adequately studied and would not be feasible because there are wetlands adjacent to the road. Wetlands in general are an endangered part of our ecosystem, and as a respected university with a strong environmental/marine/science track record, I cannot understand why UCSB would risk the wetlands at your back door.

The university has not properly analyzed the impacts involved with opening Phelps Road, including the impact to the Phelps/Bayberry intersection. I would like to request that the university refrain from creating the Phelps/Mesa vehicle connection in order to protect pedestrian and bicycle safety.

Phelps road is a dead end in my neighborhood. It is bracketed by tennis courts, a day care, a playground in addition to low income apartments on one side, and a pool, barbecue areas, and fitness center on the other. There is less than 15 feet between the street and the pool. There is less than 8 feet between the street and the pool deck. There is less than 8 feet between the street and the tennis courts. The mentioned at least have a metal fence. There is less than 15 feet between the playground and the street. There is NO barrier whatsoever between the play structure and the street. Children cross that intersection both ways in the morning and in the evening on the way to and from school in addition to using the facilities on either side. I am VERY CONCERNED about the SAFETY of those CHILDREN and parents who access these areas in light of the increased speed and number of vehicles. Statistically (according to CHP), 25% of accidents are caused by or involve people between the ages of 17-25. Which is precisely the age group who would be using this road? I hope that the university would eliminate the creation of the Phelps/Mesa vehicle connection to protect the integrity of our community from division, air pollution, noise, and traffic hazards, and the very real potential of serious harm to pedestrians and recreational users.

There is a finite amount of space sandwiched between the mountains and the ocean here. I propose that UCSB cap enrollment at a lower number to limit the impacts on this already stretched community. The cumulative effects of additional people, cars, and buildings on the traffic, noise, sensitive wetlands, air quality, water, wastewater facilities,
recreational facilities, public education, police, and fire are staggering. Where do increased tax revenues come from to pay for increased student populations at the elementary and secondary school levels? Where are the funds for police and fire outside of the UC area? What happens to the county tax base once land is purchased by the UC system? There are other areas where the UC System could expand its satellite classes that need to be explored. How many current employees commute more than 30 miles? How many of them would be able to do their jobs at a satellite campus in their hometown?

In regards to the proposed Storke Family Housing site, I would like to ask the university to decrease the density of the proposed housing. It’s currently planned for greater than 5 times that of Storke Ranch which is clearly incompatible with the community that already exists. The proposed heights would block currently existing views, and I ask that the university decrease the height of the proposed housing to be consistent with the existing community.

As the project stands now, there is an insufficient buffer between the Storke Family Housing, and the homeowners on that end of Storke Ranch. I would like to see a MINIMUM of 100 feet of green space with trees and other landscaping between the new buildings and Storke Ranch. This would also enhance the bike path safety as well.

If the orientation of the Storke Family Housing garages and garbage access were changed to face away from Storke Ranch that would further minimize noise impacts to your Storke Ranch neighbors.

Regarding the Santa Catalina dorms (formerly Francisco Torres), I would like to see that planning be eliminated completely, but if not, at least create some buffer space and reduce the height of new building to match the scale of the Storke Ranch community.

I feel there are many areas of the LRDP that need to be revisited, and welcome this opportunity to comment. Please consider some of my concerns.

Regards,

James H. Davis
Dawn M. Heimendinger

James H. Davis
Dawn M. Heimendinger
6862 Shadowbrook Drive
Goleta, CA 93117
805-685-9951
Response to Comment R-23-1. Regarding potential wetland impacts, please see response to comment O-18-3.

Regarding other issues, please see Master Response - Phelps/Mesa Connection.

Response to Comment R-23-2. Regarding a reduced enrollment cap alternative, please see responses to comments I-44-10B and I-44-15B

CEQA requires the EIR to address the physical environmental effects of the LRDP. Fiscal issues are not within the document’s scope. For more information, please see Master Response – Fiscal Issues.

Regarding the proposal for a satellite campus please see response to comment I-42-12.

Response to Comment R-23-3. Please see response to comment A-12-51.

Figures 4.13-4A and 4.13-4B illustrate the proposed bicycle and pedestrian facilities with the LRDP, which includes recreational, separated, and shared routes for both modes of travel. Safety issues were a part of the analysis of bicycle and pedestrian impacts in the Traffic section, and these are reduced to a less than significant level by mitigation and appropriate design as various components of the LRDP are developed. No further mitigation is required.

Regarding garage orientation, please see response to comment R-20-1.

Response to Comment R-23-4. Please see response to comment R-6-3 and A-12-51.
From: Cyril Humphris [mailto:ch@cyrilhumphris.com]
Sent: Saturday, March 28, 2009 9:57 AM
To: info@UCSBVision2025.com
Subject: LRDP and EIR

Dear Sir,
At the recent Goleta City Council meeting to consider the revised LRDP and EIR Councillor Bennet made a very significant point that has not been sufficiently emphasized. That is the size of UCSB in proportion to the size of the relatively small surrounding community of Goleta is entirely disproportionate in comparison with other California universities that are comfortably embedded in large population centers. This question of scale means that the growth planned by UCSB threatens the fragile balance that at present exists between the quality of life of the Goleta community and the proper functioning of the university. At the present time most Goletans look favorably on their big brother (no Orwellian reference intended) and the many benefits they enjoy through their proximity. The proposed increase in traffic, numbers of car parking spaces up to 14,000 from 11,000, and the change in height and density of the building on campus will alter dramatically the impact of the University on the surrounding community. It is surely in the interest of the University to continue to be a welcome guest in Goleta. The dynamics of the UCSB plan could change in a very positive manner for all concerned if UCSB would reconsider their long term transport policy. At present the UCSB plan is designed to cater for extra traffic in the orbital roads and for more cars on campus. Having repeatedly questioned the UCSB assumptions on this pivotal issue of cars on campus the response has been 'Yes, we are on the same page as you, but we must always prepare for the worst case scenario'. This is a verbatim quote from a member of your planning staff. If UCSB is only ready to commit itself to a worst case scenario how will it be possible to arrive at an enlightened solution that takes account of the sea change in energy policy and the tectonic movements in our economy and financial system? UCSB is aware of my proposal for a solar powered electric integrated transport system on the wider campus that is integrated with the Goleta transport system. I will not rehearse its potential benefits. Professor Walter Kohn has said the idea merits consideration and there is a department on campus that could determine its feasibility. What can be lost in exploring what appears to be a win win solution.

As a resident of Storke Ranch I support the criticisms that of have been made of the revised UCSB EIR that include unacceptable traffic levels on a very sensitive neighborhood. Consequent loss of air quality. Less safety for a child friendly neighborhood. High density construction and increased heights of buildings.

Yours

Cyril Humphris
**Letter R-24**  
Cyril Humphris  

3/27/2009

**Response to Comment R-24-1.** Regarding the Phelps-Mesa connection, please see Master Response – Phelps/Mesa Connection.

Regarding density in development areas bordering Storke Ranch, please see response to comment A-12-51.

Regarding alternative transportation planning, please see responses to comments R- 4-19, A-12-48 and A-13-1.
March 27, 2009

Via email info@ucsbvision2025

and by USPS

Office of Campus Planning and Design

C/o Vision 2025

University of California, Santa Barbara

Santa Barbara, CA  93106-1030

Subject:  Draft Long Range Development Plan - Environmental Impact Report

Dear Sir or Madam:

The following are our comments to supplement those provided on June 23, 2008:

Assumptions

Based on the current global economic downturns and the State of California’s budget deficits, growth rates do not correlate with current economic conditions or future funding of the project build out.

Flooding/Grading

Storke Pattern Book provides an inventory of architectural styles and details of size, bulk and mass with the St orke complex. Storke housing is discussed in the E.I.R. as a demolish and construction project associated with existing flooding constraints.

The architectural concept work with respect to size, bulk and mass is vague since there is no impact discussion as to the relationship of existing finished surfaces compared to adjacent finished floor surfaces (i.e., what is the base flood elevation, datum and how much fill will need required to raise the Storke Housing pads to establish the finished floor elevations to insure development is outside the 100-year flood event elevation.

Based on the present economic climate, budget of the State of California and concept only available information, the clear course of action is support for reduced density and the analysis of a reduced project with clear disclosure to adjacent property owners and decision makers.

Thank you for the opportunity to comment.

Sincerely,

Joseph Patrick Yochum                                            Eliane Yochum

6789 Sweetwater Way                                             6789 Sweetwater Way

Goleta, CA  93117-5522                              &nb sp;            Goleta, CA  93117-5522
Letter R-25
Joseph & Elaine Yochum

3/27/2009

Response to Comment R-25-1. The RDEIR and DEIR’s analyses assume full buildout of the LRDP and of the surrounding communities. This allows the analyses to consider, disclose, and identify mitigation form, the most severe foreseeable cumulative impacts to which development under the LRDP will contribute. If development stops short of full buildout, as the commentator predicts, the impacts of the LRDP will likely be less severe than the DEIR and RDEIR project.

Response to Comment R-25-2. The LRDP is a development program, and the EIR analyzes its impacts at a programmatic level. As specific projects are proposed, they will be subject to environmental review under CEQA and project-specific mitigation measures will be identified and adopted where appropriate.

Regarding the proposed reduced project, please see responses to comments I-44-10B and I-44-15B.
County of Santa Barbara
Comments on the
2008 University of California
Long Range Development Plan
Recirculated Draft Environmental Impact Report
[2008 UCSB LRDP RDEIR]

Responses adhere to comments as numbered in Attachment B of County letter

Submitted March 30, 2009

Office of Long Range Planning
Planning and Development Department
County of Santa Barbara
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Attachment B:
County of Santa Barbara
Comments on the 2008 LRDP RDEIR

Submitted March 30, 2008

Office of Long Range Planning
Planning and Development Department
County of Santa Barbara
County of Santa Barbara
Comments on the
2008 University of California
Long Range Development Plan
Recirculated Draft Environmental Impact Report
[2008 UCSB LRDP RDEIR]

Responses adhere to comments as numbered in Attachment B of County letter

Submitted March 30, 2009

Office of Long Range Planning
Planning and Development Department
County of Santa Barbara
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March 30, 2009

Marc Fisher, AIA, Senior Associate Vice Chancellor
Campus Planning and Design
Facilities Management
c/o Vision 2025
UC Santa Barbara, CA 93106-1030

Re: Draft Environmental Impact Report (DEIR)
2008 UC Santa Barbara Long Range Development Plan (LRDP)
State Clearing House Number: 2007051128

Dear Mr. Fisher:

The County of Santa Barbara respectfully submits these comments on the UC Santa Barbara 2008 Long Range Development Plan (“Project”) and Recirculated Draft EIR (“RDEIR”). Our comments are presented in four parts:

- Attachment A replicates comments on the original DEIR for those sections not recirculated for public review;
- Attachment B contains comments specific to those sections that have been recirculated;
- Attachment C contains the EPS Study on LRDP Fiscal Impacts; and
- Attachment D contains our previous comments on the Ocean Road Housing Project Initial Study.

These attachments, collectively, constitute our response to the RDEIR.

As we noted in our comment letter last June, the 2008 LRDP is an ambitious plan to implement admirable academic goals. The County of Santa Barbara (County) fully recognizes UCSB as a world-class higher education institution that enriches the community and figures prominently in the lives of County residents. Helping the University attain its academic and enrollment goals is in the broad interest of all residents. In that vain, the County’s objective is to assist the University in these endeavors in ways that protect the quality of life that County of Santa Barbara residents cherish so much.

While we support the University’s academic goals, and despite additional analysis performed in connection with the RDEIR, fundamental issues persist. Specifically, the EIR is deficient in a number of significant respects. It fails to adequately address many of this Project’s direct, cumulative, and growth-inducing environmental impacts, omits reasonable alternatives, and fails to assure adequate mitigation of significant impacts such as population growth and parking impacts. Furthermore, the Project poses substantial conflicts with surrounding general plans and land use regulations.
Because of these concerns, and unless a comprehensive agreement is reached, we will urge the UC Board of Regents ("Regents") not to approve this Project until the University has fully complied with all applicable environmental laws, including the California Environmental Quality Act, Public Resources Code section 21000, et seq. ("CEQA"), the County of Santa Barbara Local Coastal Plan, Goleta Community Plan, County General Plan (particularly its 2003-2008 Housing Element), County Redevelopment Agency Isla Vista Master Plan, Joint County, City of Goleta and UCSB Ellwood-Devereux Open Space Plan, City of Goleta General Plan and the City of Santa Barbara Airport Specific Plan.

In summary, the EIR for the UCSB 2008 LRDP Project violates CEQA. In adopting the California Environmental Quality Act ("CEQA"), the Legislature found and declared that "[i]t is necessary to provide a high-quality environment that at all times is healthful and pleasing to the senses and intellect of man," and to that end, "all agencies . which regulate activities . . which are found to affect the quality of the environment, shall regulate such activities so that major consideration is given to preventing environmental damage. . . ." Public Resources Code ("PRC") § 21000, subds. (b) and (g).

Accordingly, the Legislature declared that "it is the policy of the state to . . . take all action necessary to protect, rehabilitate, and enhance the environmental quality of the state[;] . . . [t]ake all action necessary to provide the people of this state with clean air and water, enjoyment of aesthetic, natural, scenic, and historic environmental qualities, and freedom from excessive noise[,] [and] . . . [e]nsure that the long-term protection of the environment, consistent with the provision of a decent home and suitable living environment for every Californian, shall be the guiding criterion in public decisions." PRC § 21001, subds. (a), (b), and (d). The Legislature further found and declared that "it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects".

To accomplish the foregoing statutory objectives, CEQA requires agencies to prepare environmental impact reports on projects that may have a significant impact on the environment, such as the proposed UCSB 2008 LRDP Project. In preparing the required EIR on this Project, UCSB must heed the California Supreme Court's admonition that "[t]he preparation and circulation of an EIR is more than a set of technical hurdles for agencies and developers to overcome. The EIR's function is to ensure that government officials who decide to build or approve a project do so with a full understanding of the environmental consequences and, equally important, that the public is assured those consequences have been taken into account.

The EIR for the UCSB 2008 LRDP Project falls short of CEQA's mandates in eight principal areas:

1. It fails to consider and fully analyze a reasonable range of alternatives as required by CEQA Guidelines section 15126.6;

2. It fails to disclose and address the Project's lack of consistency with the County of Santa Barbara Local Coastal Plan, Goleta Community Plan, County General Plan (particularly its 2003-2008 Housing Element), County Redevelopment Agency Isla Vista Master Plan, Joint County, City of Goleta and UCSB Ellwood-Devereux Open Space Plan, City of Goleta General Plan and the City of Santa Barbara Airport Specific Plan.
Space Plan, City of Goleta General Plan and the City of Santa Barbara Airport Specific Plan, contrary to CEQA Guidelines section 15125(d);

(3) It fails to provide certain and enforceable mitigation measures, contrary to CEQA Guidelines section 15126.4(a) (2);

(4) It fails to disclose and address the Project’s growth-inducing and cumulative effects, contrary to CEQA Guidelines sections 15126(d), 15130 and 15144;

(5) It fails to adequately disclose and address the Project’s impacts on traffic and parking;

(6) It fails to adequately disclose and address the Project’s impacts on public services;

(7) It fails to adequately disclose and address the Project’s water, sewer and hydrologic impacts including its increase in groundwater pumping, discharge of sewage and creation of impervious surfaces, contrary to CEQA Guidelines Section 15126.2; and

(8) It fails to provide an adequate statement of reasons why potentially significant effects have been found to be insignificant, contrary to Public Resources Code section 21100, subd. (c) and CEQA Guidelines section 15128.

For each of these reasons, as discussed more thoroughly below, the Regents must reject the EIR on this Project and remand this matter to staff to correct these deficiencies.

1. **The EIR Fails to Consider a Reasonable Range of Alternatives.**

An EIR is required to insure that all reasonable alternatives to proposed projects are thoroughly assessed by the responsible official. Therefore, an EIR must “describe a range of reasonable alternatives to the project or to the location of the project, which could feasibly attain the basic objectives of the project and evaluate the comparative merits of the alternatives. The EIR’s “discussion must focus on alternatives capable of eliminating any significant adverse environmental effects or reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly”.

The Draft EIR fails to provide adequate and thorough discussions of the proposed alternatives. The DEIR dismisses the Reduced Enrollment alternative because it “fails to meet the first project objective, maturation of the academic programs.” The DEIR claims that limiting the enrollment increase to 3,000 instead of 5,000 would not meet this objective. However, the DEIR does not explain the logic behind this conclusionary statement. Reducing enrollment will at least partially meet the objective of maturation of the academic programs. Furthermore, to be feasible, an alternative need not meet all of the project’s objectives, so long as most of the objectives are met.

The Virtual University Alternative is also dismissed without a thorough analysis. The DEIR asserts that “virtual learning does not provide collaborative learning nor foster interaction among students and between students and faculty. Therefore, the Virtual University would not achieve the project’s academic goals.” No explanation is provided to support this conclusionary statement. There is no reason why a virtual program could not be created to provide for collaborative learning and foster interaction between students and staff. Modern technology
allows for conferencing over the internet using web-cams and microphones. Students and faculty need not be in the same room to interact.

The No On-Campus Housing alternative was infeasible from the beginning and should not have been included in the DEIR as part of the “reasonable range of alternatives”. Furthermore, the DEIR fails to clearly explain why the No Project alternative was chosen as the environmentally superior alternative when it only “partially” meets one of the five objectives laid out in the DEIR, while the Reduced Enrollment Alternative and the Virtual University Alternative achieve five out of five and four out of five objectives, respectively.

Lastly, the DEIR failed to address other possible alternatives that could meet the Project’s objectives and reduce the significant environmental impacts of the Project. One such alternative is for UCSB to purchase housing in Isla Vista and convert it into student-housing. The housing would not be “on-campus” but it would be owned by the University and could house students, faculty, and staff. Such an alternative would alleviate many of the significant impacts of the Project and still allow the LRDP to meet all of its objectives.

Another viable alternative to the Project would be for the University to purchase enough housing to provide on-campus and/or University-owned housing for upper-class students. Currently only first-year students are guaranteed on-campus housing. By increasing the University’s housing stock and extending that housing to upper-class students, the University could alleviate some of the growth inducing and spill-over impacts of the Project while meeting the Project’s objectives.

2. **The EIR Fails to Disclose and Address the Project’s Lack of Consistency with Surrounding General and Regional Plans.**

CEQA Guidelines section 15125(d) directs that “[t]he EIR shall discuss any inconsistencies between the proposed project and applicable general plans and regional plans”. Although the DEIR acknowledges the existence of the 1980 County Comprehensive Plan, it fails to address other relevant planning documents for the area and their relationship to UCSB and the 2008 LRDP. These documents include the County of Santa Barbara Local Coastal Plan, the Goleta Community Plan, the County General Plan (particularly its 2003-2008 Housing Element), the County Redevelopment Agency Isla Vista Master Plan, the Joint County, City of Goleta and UCSB Ellwood-Devereux Open Space Plan, the City of Goleta General Plan and the City of Santa Barbara Airport Specific Plan.

The DEIR should include an analysis of the Project’s consistency (or lack thereof) with the California Coastal Act and the County’s Local Coastal Plan, as well as the County’s Goleta Community Plan. Under section 4.8.1.3 Adjacent and Surrounding Land Uses the DEIR should fully analyze all adjacent land uses, including the County’s Master Plan for the unincorporated community of Isla Vista.

Under section 4.8.2 Impacts and Mitigations, the DEIR needs to provide a comprehensive land use analysis for all County land uses, and should fully disclose all applicable land use policies from the County Local Coastal Plan, the Goleta Community Plan the 2003-2008 Housing Element, the Ellwood-Devereux Open Space Plan and the Isla Vista Master Plan. Without complete disclosure, the impact analysis and attempted mitigation measures are incomplete. To fully mitigate the Project’s impacts, the University must pay development impact fees for all impacts on public facilities due to the implementation of the 2008 LRDP. Furthermore, the University should pay its fair share for funding improvements to impacted public services.
One key impact that goes unaddressed in the DEIR is the impact of increasing commercial uses on Ocean Road. The proposed increase in commercial uses on Ocean Road will directly compete with Isla Vista businesses, and may cause rents to lower for commercial properties in Isla Vista. Interface Action 2.4 of the County’s Isla Vista Master Plan specifically states that the RDA will encourage UCSB to build staff and faculty housing along Ocean Road and that the RDA will discourage student housing and commercial development along Ocean Road. To mitigate the Project’s impacts on Ocean Road, the DEIR should prohibit certain commercial uses along Ocean Road and limit commercial growth in the area.

Impact LU-6 says that the implementation of the 2008 LRDP will not physically divide an existing community. This impact is listed as “Less than significant” and no mitigation measures are proposed. The analysis of this impact does not take into account the isolation that will occur due to the proposed height and density increases along the periphery of Isla Vista. As the 2008 LRDP approaches completion, Isla Vista will be surrounded by tall buildings, cutting the community off from surrounding neighborhoods.

Impact LU-7 asserts that development under the 2008 LRDP will “not result in the development of land uses that are substantially incompatible with existing adjacent land uses or planned uses in the surrounding area.” However, without full disclosure and analysis of surrounding plans, this impact has not been fully analyzed.

3. The EIR Fails to Provide Certain and Enforceable Mitigation Measures.

One of CEQA’s cornerstones is its requirement that agencies mitigate the potentially significant adverse impacts of projects through adoption of alternatives or mitigation measures. CEQA Guidelines section 15126.4(a) (2) requires that “[m]itigation measures must be fully enforceable through permit conditions, agreements, or other legally-binding instruments”. Contrary to this requirement, the DEIR relies on numerous mitigation measures that are unenforceable or are to be formulated in the future, including:

1. Review project designs for protection of views, scale, proportion, appearance and Solar access and landscaping not blocking views of the ocean or hills (Mitigation AES-3A-6B);

2. Support the full implementation of UCSB’s Sustainability Plan (Mitigation AIR-1B);

3. Require construction contractors to develop a “construction mitigation plan” (Mitigation AIR-3A);

4. Develop a comprehensive “Noise Reduction Program” (Mitigation NOISE-3A);

5. “Work towards” providing housing for each added increment of new enrollment within four years (Mitigation POP-3A);

6. If the University is not making sufficient progress towards the goal of providing housing, it “shall require taking some or all of the following measures to increase progress:” review area housing supply and if there is a shortfall, accelerate planning for on-campus housing and until new on-campus housing can be built; additionally, the University “shall take one or more of the following actions as necessary to relieve...
an interim housing shortage: increase per-room occupancy of existing on-campus facilities, seek off-campus housing opportunities to be leased by the University for short-term, or temporarily convert living spaces such as lounges into bedrooms (Mitigation POP-3A);

(7) Enhance and promote existing transportation demand management measures (Mitigation TRAFFIC-1A (1));

(8) Work with cities, County, SBCAG and SBMTD to determine appropriate transportation improvements (Mitigation TRAFFIC-1A (3), and 8A);

(9) Contribute the University’s proportionate share of mitigating significant impacts to intersections and roadways, and make payment available no later than start of construction or when implementation of improvement is reasonably certain (Mitigation TRAFFIC-1A(4))

(10) Provide a “balanced transportation system” on campus, roadway improvements shall not conflict with existing or planned bicycle or pedestrian facilities and improvements shall be implemented as necessary (Mitigation TRAFFIC-3A);

(11) Work to identify and acquire additional water supplies as necessary (Mitigation W-3F);

(12) Request that GSD and GWSD apply to Regional Water Quality Control Board to modify or re-issue each District’s NPDES permit for the wastewater treatment plants to accommodate enrollment growth (Mitigation WW-1A); and

(13) Negotiate acquisition of additional design capacity in GSD wastewater treatment plant to accommodate enrollment growth (Mitigation WW-1B).

CEQA requires mitigation measures to substantially lessen or avoid otherwise significant adverse environmental impacts. PRC §§ 21002, 21081(a); Guidelines §§ 15002(a) (3), 15021(a) (2), and 15091(a) (1). The mitigation measures laid out above will not substantially lessen or avoid the potentially significant impacts of the Project because they are either unenforceable or propose a plan to be created in the future.

4. The EIR Fails to Disclose and Address the Project’s Growth-Inducing and Cumulative Effects.

CEQA Guidelines section 15126(d) provides that an EIR must discuss the growth-inducing impact of the proposed project. Guidelines section 15130(a) likewise provides that “[a]n EIR shall discuss cumulative impacts of a project when the project’s incremental effect is cumulatively considerable . . . .” In conducting these assessments, “an agency must use its best efforts to find out and disclose all that it reasonably can”, even if that involves “some degree of forecasting”. CEQA Guidelines § 15144.

Contrary to these directives, the Project EIR fails to adequately disclose and discuss its growth-inducing and cumulative effects. The Project will have both direct and indirect growth-inducing effects. The Population and Housing Chapter in the Re-Circulated DEIR (“RDEIR”) admits that only 30% of students live on campus. However, the RDEIR masks the significant number of
students who live off campus by indicating that 70% of students live either off-campus or in Isla Vista. Since Isla Vista is off-campus, the RDEIR should accurately state that 70% of students live off-campus. The Original DEIR indicated that the City of Santa Barbara expected population growth to out-pace housing growth, but the RDEIR states that the creation of new housing will keep pace with population growth. There is no explanation as to why this change was made.

The RDEIR does admit that the 2008 LRDP would induce non-UCSB related employment growth and that in turn may necessitate new housing. However, in Impact POP-1, the RDEIR states that the LRDP would not directly cause substantial population growth in the area due to the provision of adequate housing on campus. However, on-campus housing will not alleviate the need of additional housing for residents who are not UCSB faculty/staff or students. This impact is brought up in POP-4, which admits that the LRDP will indirectly contribute to housing demand that could exceed supply. The RDEIR states that this impact is significant and unavoidable. This impact is not unavoidable. If UCSB made more efforts to limit enrollment growth and to house a higher percentage of all of their students (not just first-year undergraduate students) on-campus, the impacts of indirect growth on the surrounding community would be lessened.

Furthermore, the mitigation measures proposed to address a short-fall in on-campus housing are inadequate. To deal with this significant and unavoidable impact, the RDEIR proposes to assign higher numbers of students to each dorm room and to turn lounge areas into bedrooms for students forced to live on-campus. The RDEIR also proposes that UCSB lease off-campus motels or apartments as a stop-gap measure until sufficient on-campus housing is available. Furthermore, the most sensible mitigation for this impact is for UCSB to demolish old housing before increasing enrollment or hiring new faculty/staff.

5. The EIR fails to adequately disclose and Address the Project’s Impacts on Traffic and Parking.

CEQA Guidelines section 15126.2(a) directs that “[a]n EIR shall identify and focus on the significant environmental effects of the proposed project”. The 2008 LRDP will have significant effects both on the UCSB campus, as well as the community surrounding UCSB. The increased number of faculty/staff and students traveling to and from the campus, and attempting to park on or around the campus will have a significant effect on the communities surrounding UCSB. These significant impacts are not adequately disclosed or addressed in the RDEIR. The increased population of UCSB will have adverse impacts on local roadway operations due to both increased vehicular traffic and increased bicycle and pedestrian traffic. Parking in the surrounding community will likewise be adversely impacted. None of these impacts are adequately disclosed or addressed in the RDEIR.

Levels of service (LOS) on the roadways surrounding UCSB are already impacted by campus-generated traffic. Without significant changes and mitigation measures, the increase of UCSB population over time will continually degrade the surrounding roadways, leading to more congestion. In addition to the increased number of vehicles, the increase in UCSB population will also increase bicycle and pedestrian traffic, which will only exacerbate the current congestion. The RDEIR claims that since new faculty/staff and students will be living on-campus, additional parking demands will be minimal. Just because these new faculty/staff and students will be living on-campus does not mean that they will not bring and/or need a car or will not be traveling on County roads during peak hours. Furthermore, unless UCSB implements a
restriction on new faculty/staff and students having a car, the increased population will cause an
increase in parking and congestion.

Currently UCSB does not allow some students living on-campus or living in Isla Vista to purchase parking permits for the Main Campus. This simply means that the students living on-campus and in Isla Vista who do have cars will park them on other parts of the campus, or will park their cars in the surrounding community. Since the LRDP will only add 3,650 spaces for all UCSB campuses, the RDEIR needs to do more to mitigate the significant impact that the increased population will have on parking and mobility on and around UCSB’s campus. The RDEIR also fails to address the difficulties that have been encountered in past attempts to implement parking permit programs.

The RDEIR's attempts to mitigate the significant and unavoidable impacts that the increase in population will have on transportation and parking are insufficient. Calling for unspecified “alternative transportation enhancements” is vague. Impact TRAFFIC-4 states that the LRDP will degrade LOS conditions, but is vague as to how much degradation will occur under 2025 conditions where the Original DEIR said that 2025 conditions would lead to “unacceptable” LOS conditions. The RDEIR proposes widening westbound Phelps Road and constructing the Phelps/Mesa Connection to partially mitigate the impacts to LOS at the Hollister/Storke Intersection. The RDEIR, however, does not provide that this has been considered in the past but that no environmental review has been done. Without the proper environmental review, this suggestion does not adequately mitigate this impact.

The RDEIR acknowledges that the increased number of bicyclists and pedestrians will create significant impacts at certain intersections which will warrant controlled signals. While these signals may make travel safer for bicyclists and pedestrians, the RDEIR does not address who will pay for these signals, nor does the RDEIR address how the implementation of crossing-signals might impede vehicular traffic and further degrade levels of service.

6. The EIR Fails to Adequately Address the Project’s Impacts on Public Services.

CEQA Guidelines section 15126.2(a) directs, “[a]n EIR shall identify and focus on the significant environmental effects of the proposed project”. The increase in student and faculty/staff population under the UCSB LRDP will create a significant adverse impact on public services provided by the County of Santa Barbara. The increased UCSB-affiliated population will add additional strain to the County’s services which go un-mitigated in the DEIR.

The DEIR claims that the increase in on-campus population “has the potential to result in an increase in demand on the Santa Barbara County Sheriff’s Department and the California Highway Patrol, including their respective services and facilities.” (LRDP Impact PUB-2). The DEIR fails to adequately analyze this impact and claims that the impact is less than significant and that no mitigation is required. The reasoning behind this conclusion is that UCSB’s Police Department is the sole provider of law enforcement on campus, and since population growth from the LRDP will occur “almost entirely on campus, demand on other law enforcement agencies will not increase substantially.”

The DEIR, however, fails to address the University’s own proposal that there will be a four-year lag-time between when new students are admitted and new faculty/staff are hired and when they will be housed on-campus. Furthermore, the discussion provided by the DEIR fails to address the fact that 70% of UCSB students live off-campus. Since only first-year
undergraduate students are guaranteed on-campus housing, the increase in student population will increase the population of UCSB upper-class students living off-campus, which will in turn impact the Santa Barbara County Sheriff’s Department.

The DEIR fails to adequately disclose the extent of assistance that the UCSB Police Department receives from the Sheriff’s office. Every year the Sheriff’s Office helps with large events and demonstrations on campus, ranging from annual Halloween festivities and Fall Orientation to other various events and demonstrations on-campus. As student enrollment grows, the need for assistance from the Sheriff’s Office will grow proportionally.

Furthermore, the DEIR does not acknowledge nor analyze that the Isla Vista Foot Patrol, the most active unit of the Sheriff’s Department, will be severely impacted by the increase in population. The Isla Vista Foot Patrol is supposed to be staffed half by the Sheriff’s Department and half by the UCSB Police Department. However, the ranks were not increased after the increase in enrollment pursuant to the 1990 LRDP, meaning that the Foot Patrol is already understaffed. Of the 28 Officers currently on the Foot Patrol, only 7 are from the UCSB Police Department. The University staffing levels vary from day to day and the County cannot rely on the University officers as they are the first to back fill staffing needs on campus or for other special assignments. These impacts are clearly significant and adverse, and therefore the University must mitigate these impacts.

The DEIR does acknowledge that the increased need for Fire Department services and facilities will have a significant and unavoidable impact. To mitigate this impact, the University suggests that it will pay its proportionate share of expanding the Fire Department. This mitigation, however, is not sufficient because it is the University’s responsibility to provide fire services for campus related population, and the University should shoulder the entire cost of improving and operating those fire-service facilities.

The DEIR also fails to address the LRDP’s impact on increased demand for public library facilities. The DEIR asserts that because the LRDP will expand on-campus library access, the impact on County public libraries will be less than significant. This analysis, however, is incomplete because it assumes that since the new students and faculty/staff will have access to more libraries on campus that they will not use Santa Barbara County public libraries. All UCSB students and faculty/staff that live on-campus or in Santa Barbara County will qualify for free use of the County’s public libraries, and may in fact prefer to use those libraries, particularly families with children. Without having performed any survey or study of how many UCSB students and faculty/staff use the County’s libraries, the DEIR has not adequately analyzed this impact.

7. The EIR Fails to Adequately Disclose and Address the Project’s Water, Sewer and Hydrologic Impacts.

CEQA Guidelines section 15126.2(a) directs that “[a]n EIR shall identify and focus on the significant environmental effects of the proposed project”. The LRDP will have significant impacts on water quality, water supply, and wastewater. None of these impacts are adequately disclosed or addressed in the DEIR.

Implementation of the LRDP will involve the demolition of existing structures and grading and excavation as well as construction of new structures. Completion of the LRDP will result in 1.8 million net new assignable square feet of development. The resultant increase in impermeable
surfaces will have a negative effect on the amount and quality of water run-off. This run-off may end up polluting any of a number of water bodies on and surrounding the UCSB campus. These water bodies include the Storke Wetlands, the Campus Lagoon, the Goleta Slough, and the Pacific Ocean.

The Goleta Slough is listed as an impaired water body under section 303(d) of the Clean Water Act, so any run-off into the Goleta Slough is significant. The DEIR should analyze what types of runoff might occur. More steps should be taken to mitigate the adverse impacts to on-campus and campus-adjacent water bodies. The DEIR should analyze the benefits of permeable pavement as well as retrofitting existing drainage facilities on-campus.

The increase in population due to the 2025 LRDP coupled with additional growth within the Goleta Water District’s service area will have a significant impact on groundwater pumping in the area. The RDEIR admits that this impact is significant before mitigation, but claims to have mitigated the impact to less than significant through a variety of mostly vague, unenforceable mitigation measures. Furthermore, the RDEIR does not fully analyze the impact of the indirect growth that the LRDP will cause on water supply.

Mitigation W-3B proposes to individually meter all new UCSB living units or buildings and institute a graduated fee structure. This may have some effect on faculty/staff housing if those tenants are required to pay for their own utilities. However, as far as on-campus dormitory-style housing, it will be challenging for UCSB to charge each student for his or her own individual water use, thereby making this mitigation measure largely infeasible. Mitigation W-3C proposes the installation of water saving devices in new and existing buildings, but gives no time-line of when the devices in pre-existing buildings will be replaced. With no time-line for progress, this mitigation is largely unenforceable as to the replacement of devices in existing buildings. Measures 3D and 3E are vague and unenforceable. Requiring the annual training of dormitory residents and the development of a UCSB “Water Conservation Program” will have no measurable effect on conserving water. Lastly, mitigation 3F, which requires the University to “work to identify and acquire additional water supplies”, will not stand up to enforcement because it does not actually require the University to do anything concrete. Without a solid requirement for the University to acquire sufficient water rights to fulfill the Project’s needs, the Project’s impacts on water supply remain significant and unavoidable.

Using the 2008 wastewater flows, the RDEIR reflects the significant adverse impacts that the LRDP will have on wastewater flows. If the project is approved as planned, the wastewater flows from the University will exceed the University’s portion of the wastewater facilities’ capacity, the University’s capacity under the GSD’s NPDES permit would be exceeded, and the Goleta Sanitary District’s NPDES permit capacity will be exceeded. These cascading impacts will have a significant adverse effect on both the UCSB campus, and on the surrounding community that relies on the GWD’s wastewater facility. The only mitigation measures suggested by the RDEIR involve the University requesting that the GSD and the GWSD apply for new NPDES permits, and negotiating the acquisition of additional capacity in the GSD wastewater treatment plant. Neither of these mitigation measures adequately addresses the significant adverse impact that the LRDP will have on wastewater treatment in the GSD because they both are pledges and requests rather than quantifiable measures to address impacts as is required under CEQA.
8. The EIR Fails to Provide an Adequate Statement of Reasons Why Potentially Significant Effects Have Been Found to be Insignificant.

Public Resources Code section 21100, subd. (c) and CEQA Guidelines section 15128 require a detailed statement of reasons why a project's potentially significant environmental effects are found to be insignificant. As discussed above, this Project poses numerous potentially significant effects not only on the site, but also on the surrounding lands, waters, traffic circulation, parking availability and public services.

Despite these numerous potentially significant effects on the environment, neither the Original DEIR nor the RDEIR provides a detailed statement of reasons explaining why these potential impacts are not significant. This omission goes against Public Resources Code section 21100, subd. (c) And CEQA Guidelines section 15128.

CONCLUSION

For the foregoing reasons, we respectfully request that the University decline to certify the Project EIR and suspend further action on the LRDP until all inadequacies are remedied in compliance with applicable law. Furthermore, we request that the University reconsider the mitigation measures in the RDEIR and DEIR and consider the implementation of all reasonable and feasible mitigation measures that are offered in the County’s attached comments.

Respectfully submitted,

John Baker
Assistant County Executive Officer

Enc: Attachment A: Comments on the Original DEIR
Attachment B: Comments on the RDEIR
Attachment C: EPS Study on LRDP Fiscal Impacts
Attachment D: Comments on the Ocean Housing Project Initial Study

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Attachment B: County of Santa Barbara Comments on the 2008 LRDP RDEIR

Submitted March 30, 2008

Office of Long Range Planning
Planning and Development Department
County of Santa Barbara
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Preface


Attachment A:
The County of Santa Barbara submitted comments on the Draft Environmental Impact Report (DEIR) for the 2008 Long Range Development Plan to UCSB on June 23, 2008. Please see these original comments in Attachment A of this comment letter for the County’s original remarks on the following sections of the DEIR:

1.0 Introduction
2.0 Summary of Environmental Impacts and Mitigation Measures
3.0 Project Description
4.0 Environmental Setting
4.1 Aesthetics
4.3 Biology
4.4 Cultural Resources
4.5 Geology, Soils and Geotechnical
4.6 Hazards and Hazardous Material
4.7 Hydrology and Water Quality
4.8 Land Use and Planning
4.9 Noise
4.11 Public Services
4.12 Recreation
4.16 Other Utilities
5.0 Alternatives
6.0 Other CEQA Considerations

Attachment B:
As Attachment B, the County has prepared comments pertaining to the Recirculated DEIR (RDEIR) sections as follows:

1.0 Introduction
2. Air Quality
4.10 Population and Housing
4.13 Transportation
4.14 Water Supply
4.15 Wastewater

Attachment C:
As Attachment C, the County has resubmitted Fiscal Impacts of University of California, Santa Barbara’s Long-Range Development Plan, prepared for the County by Economic Planning Systems in June 2008. Please refer to this document for all references to the fiscal impacts of the 2009 LRDP. Specifically, any references to Attachment B in the County’s original comment letter (Attachment A of this packet) should be redirected to Attachment C in this submission.

Attachment D:
As Attachment D, the County has submitted comments specifically addressing the Ocean Road Housing Project component of the proposed 2008 LRDP.
1.0 Introduction and Summary

Intro Comment #1. General Comment

Except as otherwise noted below, all of the County’s previous comments on the original 2008 LRDP DEIR remain unchanged and have continued relevance. Please see Attachment A for these comments. Furthermore, it is noted that the not all subparagraphs of the recirculated Sections are included in the RDEIR. For instances, in Section 4.13 Transportation and Circulation, paragraph 4.13.1.2 is missing in the RDEIR. It is unclear whether missing paragraphs default back to the DEIR or whether their exclusion is intentional and are not longer relevant. This confusion complicates the review and brings into question the adequacy of documentation and may require recirculation pursuant to Public Resources Code §15088.5 (a) (4). To ensure that all of its comments are considered, the County expressly uses the terms “document,” “EIR,” “DEIR” and “RDEIR” interchangeably throughout.

Intro Comment #2. 1-1 Background

The Ocean Road Housing Project is a component of the LRDP and is included in the assessment of environmental impacts in the RDEIR. Since the publication of the DEIR, details on the Ocean Road Housing Project have been released in the form of an Initial Study that was presented for public review by the University in November 2008. The County understands that the University has rightly withdrawn the bifurcation and analysis of the project ahead of the review and certification of the 2008 LRDP and corresponding DEIR.

The Ocean Road Housing Project is a physical manifestation of the LRDP and provides project-level insight into the environmental effects of the LRDP as a programmatic document. Information on the project was disseminated in the form of a draft Initial Study and presented by the University at scoping hearing conducted in November 2008. The wealth of information furnished by the University, along with the public’s comments on the Initial Study, raise concerns on a number of environmental issues including aesthetics, land use and planning, population and housing, and transportation and circulation. The DEIR, on the other hand, dismisses such issues with statements such as:

- “The proposed Ocean Road housing development will enhance the interface between the community and the University, as well as increase the permeability for pedestrians and bicycles.” (page 4.8-20);
- “The Ocean Road project is intended to strengthen the transition between the Main Campus and the community of Isla Vista.” (page 4.8-25); and
- “The residential uses would be compatible with the existing residential uses west of Ocean Road” (page 4.8-26).

These statements are conclusionary in nature, unsupported by facts in the record, and contradict comments made by members of the public at the Initial Study scoping meeting last November. The RDEIR must acknowledge the new information resulting from the Ocean Road Housing Project as well as the public comments on the Initial Study. Included as Attachment D is the County’s comment letter on the Ocean Road Project Initial Study; these comments are relevant to the LRDP and must be addressed as part of the RDEIR. Furthermore, the interplay of the Ocean Road Housing Project with the LRDP and their associated impacts clearly require major revision and re-circulation of entire DEIR, not only selected elements.
Intro Comment #3. 1.3 Public Review Process

The RDEIR assures the reader that all prior comments on the DEIR will receive responses in addition to those submitted on the RDEIR. For that purpose, Attachments A, C, and D to the County’s transmittal letter reiterates the comments it previously furnished in connection with the proposed 2008 LRDP and related environmental analysis.

Intro Comment #4. 1.4 Summary of Impacts and Mitigation Measures

Please note there are two elements of the text labeled as Section 1.4. In specific regard to the Summary of Impacts and Mitigation Measures, the table beginning on page 1.0-4 should be updated to incorporate the various comments made by the County in the paragraphs that follow.

Intro Comment #5. 1.4 Summary of Impacts and Mitigation Measures

The County is aware of at least one mitigation measure identified in the EIR for the 1990 LRDP that has not been executed by the University. The measure entails the relocation of the main UCSB entrance from El Colegio Road to Mesa Road. This was proposed and listed as the mitigation for traffic impacts to El Colegio Road and Isla Vista intersections as well as air quality. The consequence is a large unmitigated residual traffic impact. A second potential violation is the fact that current UC enrollment may exceed the 1990 cap of 20,000 students by approximately 1,100 persons. As a result, the conclusions in the REIR are based on faulty assumptions and thus are not supported by substantial evidence. The RDEIR must explain how pre-existing unmitigated impacts will be resolved; else, conclusions on effects attributable to the 2008 LRDP are without foundation. Given the mutual agreement and understanding on enrollment and mitigations, please provide details on how mitigation under the 2008 LRDP will be implemented, what assurances will be provided and how will oversight be monitored. Please also explain how pre-existing unmitigated impacts will be resolved.
4.2 Air Quality

AQ Comment #1  General Comment

Among other variables, air quality is a function of vehicle trip generation and traffic management. More vehicles translate to more emissions; congested intersections and peak hour trip additions increase idling time and resulting air quality degradation. For the reasons more fully discussed in Section 4.13 (Transportation and Circulation) the RDEIR understates vehicular impacts attributable to UCSB growth; both direct and indirect. As noted under Population and Housing herein (POP Comment 18: 4.10.2.3. LRDP Impact POP-4), indirect impacts attributable to the 2008 LDRP total 12,105 persons. Air quality impacts attributable to this impact must be addressed in addition to the 11,106 persons directly attributable to UC growth. As a consequence, air quality modeling is compromised and the conclusions in the REIR are based on faulty assumptions and thus are not supported by substantial evidence. Insofar as the air quality and transportation/circulation sections are interdependent, corresponding deficiencies must be corrected and resulting effects must be evaluated.

AQ Comment #2  1.4 Summary of Impacts and Mitigation Measures

The DEIR indicates that UCOP policy on Sustainable Practices requires LEED certified equivalent and encourages Silver Ratings for all new construction. However, the policy is not codified in any mitigation measure and the UC Regents could modify or change the policy should it be determined to be economically feasible to do so. The practices as outlined and referenced in relation to the UCOP practices in the Air Quality section need to be binding and it is reasonable and feasible to include the practice in an enforceable mitigation measure that requires the University to meet quantifiable benchmarks for GHG reduction.

Reasonable and feasible mitigation measures should be integrated into the EIR as provided by the Office of Planning and Research in their June 19, 2008 publication: *CEQA AND CLIMATE CHANGE: Addressing Climate Change through California Environmental Quality Act (CEQA) Review*. The Technical Advisory Document explains how impacts and mitigation measures from climate change and “greenhouse gas” (GHG) emissions should be addressed in environmental impact reports prepared for residential, commercial and industrial development and other projects under CEQA. The document augments existing California climate change legislation aimed at enforcing GHG reductions (AB 32), and requiring consideration of GHG issues in environmental analysis documents for a broad spectrum of projects (SB 97).

The Advisory document begins by providing a background on the science of climate change and how it arises in the CEQA context. CEQA does not prescribe thresholds of significance for any given environmental impact; instead, the statute encourages public agencies to adopt their own thresholds. This determination presents a particular challenge in the framework of a climate change analysis, where science continues to evolve and effects are measured on a global scale. As a result, OPR has asked the Air Resources Board (ARB) technical staff to recommend a method for setting thresholds that will encourage a consistent approach statewide. In the meantime, this Advisory provides informal guidance for lead agencies attempting to make and mitigate a GHG threshold of significance determination.

The Advisory recommends a three-step approach to CEQA analysis of GHG emissions:

1) **Mandatory Quantification of GHG Project Emissions:**

The environmental impact analysis must include quantitative estimates of CO2 and GHG emissions from different types of air emission sources within the broad range of residential, commercial, industrial and other types of projects. These estimates should include both construction-phase emissions, as well as completed...
operational emissions, using one of a variety of available modeling tools. This analysis may be located in one or more typical sections of the EIR, including air quality, transportation, energy, or a separate section on climate change.

2) **Continued Uncertainty Regarding “Significance” of Project-Specific GHG Emissions:**

Each agency preparing the environmental impact report is obligated to assess the significance of the project’s impacts on climate change (even in the absence of any thresholds of significance set by an air quality agency. OPR’s guidance also makes clear that the environmental analysis must describe a “baseline” of existing (pre-project) environmental conditions, and then add project GHG emissions onto this baseline to evaluate whether impacts are significant. This “baseline” directive is a clear rejection of arguments that GHG emissions are driven more by population than particular project.

3) **Menu of Mitigation Measures:**

OPR also identifies a menu of GHG emission mitigation measures, ranging from balanced “mixed use” master-planned project designs to construction equipment and material selection criteria and practices. Legally, mitigation may only be required for “significant” impacts. However, the ongoing technical and corresponding legal uncertainty regarding when GHG emissions are “significant” for a particular project has, as a practical matter, resulted in many projects adopting GHG mitigation measures to minimize GHG emissions and strive for “carbon neutrality.” OPR raised the legal bar on this practice by including a pointed reminder that “all feasible” mitigation measures or project alternatives must be adopted if an impact is significant, defining feasibility in relation to scientific, technical and economic factors. If mitigation measures cannot sufficiently reduce project impacts, the agency should adopt whatever measures are feasible and issue a detailed, fact-based Statement of Overriding Concerns explaining why additional mitigation is not feasible.

The EIR fails to provide any specific mitigation measures that commit the University to implement LEED standards. Reasonable and feasible mitigation measures offered in OPR’s June 2008 technical advisory, such as funding alternative transportation, etc. are ignored and are not analyzed, rendering the RDEIR’s analysis incomplete and inadequate.

**AQ Comment #3 4.2.1.3 Air Quality Standards and Existing Air Quality**

The data in Table 4.2-1 should be based upon the most recent data available from the Santa Barbara County Air Pollution Control District. The Santa Barbara Attainment/Nonattainment Classification Summary for 2008 designates Santa Barbara County as non-attainment for the California 8-hour Ozone standard and as non-attainment for the California PM10 standard. The 2008 Summary also registers the County as “Unclassifiable” for attainment of the California PM2.5 standard and as “Unclassifiable/Attainment” for the federal PM2.5 standard. This information is available at [http://www.sbcapcd.org/sbc/attainment.htm](http://www.sbcapcd.org/sbc/attainment.htm).

**AQ Comment #4 4.2.2.3 2008 LRDP Impacts and Mitigation Measures**

Impact AIR-3 should disclose that Santa Barbara County is a non-attainment zone for the California PM10 standard. The increase in NOx and PM10 emissions from construction activities under the 2008 LRDP will only further exacerbate the County's air pollution problems and will keep the County from reaching attainment status. This impact is significant and unavoidable. Reasonable and feasible mitigation measures are available to the University to reduce the impact and are provided under the transportation section of the County's comments.
4.10 Population and Housing

Pop Comment #1. General Comment

The 2008 LRDP proposes a substantial amount of growth in its student, faculty, staff populations, and related academic/support space. As proposed, the student population increase is more than double what was agreed upon for the 1990 LRDP (5,000 and 2,000, respectively). The 2008 LRDP proposes to accommodate this substantial population growth with proposed development as the University student population grows to 25,000 students from 20,000, which was the population cap established in the 1990 LRDP. However, the EIR indicates that the student population has already exceeded the student growth proposed in the 1990 LRDP, by 1,410 students (see POP Comment #2). Therefore, the conclusions in the EIR are based on faulty assumptions and thus are not supported by substantial evidence. The impacts of this preexisting growth, coupled with the proposed growth toward buildout of the 2008 LRDP must be more thoroughly addressed in this section of the DEIR through analysis and disclosure to clearly identify potential impacts on and off campus.

Pop Comment #2. 4.10.1.1 Study Area

Based on Table A.1 of the 2008 LRDP, the Total Existing Population of UCSB is 24,685. However, the EIR and the UC Santa Barbara Office of Budget and Planning discloses a much higher existing population as of the 2007-08 school year. Section 3.0: Project Description and the UC Santa Barbara 2007-08 Campus Profile discloses that in the 2007-08 school year, UCSB had:
- 9,723 Faculty and Staff (UCSB Personnel headcount, UC Santa Barbara, “2007-08 Campus Profile”, page 8, http://bap.ucsb.edu/IR/07-08/cp2007.pdf)
- Total Population = 31,133

This discrepancy is a difference of 6,448 people factoring in the existing UCSB population, not including student, staff, and faculty family members.

Similarly, Table A.1 of the 2008 LRDP reports that in 2025 the UCSB population will be 31,431 people. However, in Section 4.11: Public Services, the EIR discloses that LRDP will actually bring 11,106 additional people due to:
- 5,443 new bedspaces
- 239 net new student family units (@ 2.68 persons per unit)
- 1,874 net new faculty/staff units (@ 2.68 persons per unit)

This means that the true total primary population by 2025 from the 2008 LRDP is 42,239. The difference between these two sums is 10,808 people. Additionally, Section 4.10: Population and Housing (Table 4.10-3) reports that the unincorporated area of Isla Vista houses 40% to 46% of UCSB’s student population. At this rate, in 2025 12,463 of the 27,092 projected student population of UCSB will reside in Isla Vista. The discrepancy between what is reported in the Table A.1 and what is disclosed in the DEIR should be remedied. If this discrepancy is not remedied, the EIR will remain without accurate supporting information upon which to base conclusions on population growth and related housing demand. Furthermore, the EIR should perform all analyses of environmental impacts based on the higher potential buildout population, as this would disclose all impacts under a “worst-case scenario” development pattern.
Pop Comment #3. 4.10.1.1 Study Area

Most if not all table references in the RDEIR are incorrect. Specifically, the narrative references to tables do not match the enumeration of tables. Thus, the narrative is incomprehensible.

Pop Comment #4. 4.10.1.1 Study Area

The data provided for student and faculty populations should be consistent with the method of measurement from the 1990 LRDP. Data should also specifically illuminate how UCSB has or has not complied with the 1990 LRDP. For example, the 1990 LRDP population cap is 20,000 students; however, as implied on page 4.10-2, UCSB has already exceeded this cap by 1,082 students, given the headcount for the 2006-2007 academic year.

In addition, all tables in the EIR should reference the most recently available data regarding student, faculty, and staff headcount and FTE at UCSB. As discussed in POP Comment #2, the most recent data is available in the 2007-2008 Campus profile, not the 2006-2007 academic year as used on page 4.10-2.

Pop Comment #5. 4.10.1.2 Residence Patterns of UC-Affiliated Populations

The RDEIR indicates that 360,000 persons are forecast to visit the University each year by 2030. This translates to 955 persons/day compared to only 280 persons/day in the original DEIR. Please explain how this difference figures into traffic modeling and what mitigation measures are identified to address these impacts.

Pop Comment #6. 4.10.1.2 Residence Patterns of UC-Affiliated Populations

It should be noted that the Santa Catalina Residence Hall is located in the community of Isla Vista, and is only accessible through roadways maintained by the County. In addition, it should be noted that Santa Catalina Residence Hall housed UCSB students prior to UCSB’s acquisition of the property. This means that the 7% increase in the number of students living on UCSB-owned property, as referenced, does not reflect a net shift in students from the Isla Vista community to the UCSB campus.

Pop Comment #7. 4.10.1.2 Residence Patterns of UC-Affiliated Populations

The data provided in Table 4.10-8 should provide a nominal figure as well as a percentage for each of the represented categories. This would enable a full comparison between 1990 residential patterns and more recent residential patterns for faculty and staff.

Pop Comment #8. 4.10.1.2 Residence Patterns of UC-Affiliated Populations

Table 4.10-10 should be revised to clarify whether the “unincorporated Santa Barbara” category references the entire unincorporated South Coast, or just the communities of Isla Vista and Hope Ranch, as referenced in Table 4.10-18. If so, a note should explain that this includes the communities of Summerland, Montecito, Isla Vista, and the Eastern Goleta Valley, and consistent labeling of the unincorporated South Coast should be used throughout the document.

Pop Comment #9. 4.10.1.3 Housing

Updated (i.e., 2008) data should be used for vacancy rates, household size, and median housing prices. Data from 2006 is inadequate, particularly as it relates to vacancy rates and housing prices. New data may be accessed through numerous sources including the California Economic Forecast and the UCSB Economic Outlook.
Pop Comment #10. 4.10.1.3 Housing

Table 4.10-18 can be construed as misleading and is not very useful. The table and narrative imply that the rate of population growth should be lower than the rate of housing growth to result in a healthy housing market. In fact, the rate of household growth and formation, not population growth, is the more accurate statistic to use in comparison to housing growth. The rate of household growth and formation statistic accounts for changes in household size that are not accommodated for in the population growth statistic. For example, a low overall rate of population growth could still result in a high demand for housing, if coupled with a rapidly shrinking household size, as is the case in communities with a large population of retired households.

Pop Comment #11. 4.10.1.6 Regulatory Context

Regional Housing Needs Assessment (RHNA): Table 4.10-19 and both of the tables labeled 4.10-20 should be updated to reference the data in the adopted 2007-2014 Regional Housing Needs Allocation. The narrative associated with these tables should be updated as well to reference that the 2005-2040 Regional Growth Forecast and the 2007-2014 Regional Housing Needs Allocation, both of which do not anticipate the level of growth identified in the LRDP. SBCAG produced both documents prior to circulation of the Draft LRDP. However, since UCSB is in the unincorporated area, the County credits UCSB housing projects against the County's RHNA target. This information should also be considered in the RDEIR.

Pop Comment #12. 4.10.1.6 Regulatory Context

County of Santa Barbara: The County's Local Coastal Plan housing policies should be disclosed.

Pop Comment #13. 4.10.2.2 Analytical Method

Please clarify the distinction between Assignable Square Feet versus Gross Square Feet, as well as the ramifications in assessing impacts. The current ratio of building space for Instruction, Research, and Support Space is 154 square feet per person (i.e., 3.8 Million GSF/24,685 University Population; Table 4.10-21). Under the proposed LRDP, an increase of 2.5 Million GSF is forecast compared to a total University population increase of 6,436 students, faculty, and staff, resulting in a building to population ratio of 388 square/feet per person. This ratio is clearly not reasonable given the growth in on-campus population compared to past development patterns. Furthermore, non-resident users (i.e., visitor professors, non-profit and for profit researchers, etc.) render the assumptions inaccurate. Therefore, the EIR conclusions regarding the impacts of increased population on housing demand are not supported by evidence. Among other deficiencies, the RDEIR must articulate measures that will be taken to ensure that building uses do not change over time in ways that would compromise the environmental review process and resultant mitigation.

Pop Comment #14. 4.10.2.3. 2008 LRDP Impacts and Mitigation Measures

The EIR does not quantify the impacts of redevelopment of various existing housing developments on campus, such as Storke and Santa Ynez apartments. This type of redevelopment will likely displace substantial numbers of existing housing and people during construction. The number of people that would be displaced should be quantified and the impacts should be determined and mitigated to the extent feasible.

Alternative Mitigation Measure that is Adequate and Feasible

The 2008 LRDP and EIR should propose a phasing plan for all development. The phasing plan should address the following at issuance of Notice of Impending Development (NOID):

1) Existing student populations
2) Additional students at each phase
3) Number and types of existing housing units
4) Number and types of additional housing units
5) The location and capacity of housing for displaced residents during redevelopment projects

The issuance of any NOID should not result in the displacement of residents into surrounding areas off campus. If so, this secondary impact must be evaluated and mitigated as well. Furthermore, if at any point, on-campus housing cannot accommodate the proposed growth (student and faculty) then a reasonable and feasible mitigation measure would be to stage enrollment, faculty/staff growth and facility construction with the capacity of new housing to accommodate the added population. The proposed four-year lag in the DEIR is not acceptable as the surrounding areas will be burdened with the anticipated growth during this period. This impact, whether temporary or not, is avoidable.

Pop Comment #15. 4.10.2.3. 2008 LRDP Impacts and Mitigation Measures

LRDP Impact POP-1: No evidence is provided to support the conclusion that a vacancy rate of 9% (the difference between the enrollment growth of 5,000 students and the 5,443 planned bed spaces) is adequate to accommodate housing choices by new students and avoid direct population growth in the Isla Vista community. Housing adequacy is also a function of affordability; again, the RDEIR provides no quantitative analysis to substantiate its conclusionary statements. Since no analysis of the vacancy rate needed to facilitate appropriate housing choices is provided, it is erroneous to conclude a less than significant level of impact. Among other reasonable and feasible mitigation measures to assure that enrollment, faculty and staff growth and facility construction does not impact off-campus housing is to restrict residency in the new on-campus housing to the newly added population.

Alternative Mitigation Measure that is Adequate and Feasible

Analyze vacancy rates of other university campus housing projects to determine the level of vacancy needed to facilitate appropriate housing choices, and avoid spill-over into neighboring communities. Please provide measurable mitigation measures to address spillover to minimize impacts to housing.

Pop Comment #16. 4.10.2.3. 2008 LRDP Impacts and Mitigation Measures

LRDP Impact POP-2: The analysis of this impact is inadequate because it states that mitigations to address induced growth through roadway improvements are consistent with County goals expressed in the Isla Vista Master Plan and the County General Plan. Neither of these County documents contemplates the development or growth proposed in the 2008 LRDP, thus no clear conclusion can be made to support the designation of a “less than significant” impact based on an alignment with the goals expressed in the Isla Vista Master Plan or the County General Plan.

Furthermore, the new on-campus housing that will be constructed under the 2008 LRDP will not alleviate the housing needs of the population in Santa Barbara County who are not UCSB students, faculty or staff. The increased number of students, faculty and staff under the 2008 LRDP will cause businesses to grow in Santa Barbara County, and those businesses will attract people to move to the County to work in the County. This indirect growth cannot be classified as less than significant without a proper analysis.

Alternative Mitigation Measure that is Adequate and Feasible

The EIR should demonstrate how direct and indirect growth caused by the 2008 LRDP may impact the goals expressed in the Isla Vista Master Plan and the County General Plan, and then determine the level of significance and provide mitigations consistent with those proposed in the County’s June 2008 comments on the DEIR.
LRDP Mitigation Measure POP-3(A) is inadequate as it states that housing opportunities may not keep pace with increases in either enrollment and/or new employees anticipated under the 2008 LRDP. This is identified as a significant impact, and LRDP Mitigation POP-3A proposes to defer mitigation of the impact to a later date and through later studies. As proposed, by reviewing later permit trends, UCSB will try to assure that adequate housing will be provided for new populations. It is unclear when this housing would be provided, since pages 4.10-30 – 4.10-33 indicate that studies and subsequent actions would be performed annually, but that actions would be considered every four years. In addition, it is unclear what performance measures will be used to determine whether accelerated planning for new housing is required. It is stated on page 4.10-31 that UCSB may make a “finding” in any given year as to whether “sufficient” progress is being made to provide new housing opportunities. However, no reference or context is provided as to what constitutes “sufficient” progress. Such future findings that are not tied to specific performance standards act to postpone the required impact analysis. Such deferral of impact analysis is clearly prohibited by CEQA and also renders the mitigation measures inadequate since they are not based on appropriate and transparent existing evidence.

No analysis has been provided to illustrate the sufficiency of the menu of actions UCSB may take to house un-accommodated populations. For example, it is impractical to conclude that off-campus apartment complexes could be leased by UCSB without discussing existing apartment availability, vacancy rates, rents, and whether this action would displace existing populations. Likewise, no data has been provided to illustrate that convertible space in lounges and bedrooms is adequate to address a potential housing shortfall. A discussion on the spare feet of space available in existing facilities would suffice. Furthermore, increasing the per-room occupancy of the existing on-campus housing needs to be further analyzed for consistency with fire codes and density limitations. Finally, the conclusion that the payment of in-lieu fees for replacement housing is infeasible is unsubstantiated, since no data has been presented to analyze past housing production enabled through the in lieu fee programs managed by the County or other jurisdictions (see narrative on page 4.10-33).

The comment made on 4.10-32 that Study area communities could see temporary increases in demand for housing is in direct conflict with the designation of a less than significant impact provided for POP-1. This is especially the case, given the low rate of vacancy in Isla Vista. Any time lag between LRDP residential development and the growth in student, faculty, and staff populations presents significant impacts to the surrounding areas that could be mitigated with an accurate development phasing plan that developed housing prior to increases in enrollment. Absent such a plan, population increases will lead to an acceleration of urban blight, impacts on parking and transportation, and a decrease in the availability and sufficiency of public services, among other foreseeable issues.

To provide data and context regarding impact to surrounding communities, over any given four-year period in the LRDP, housing for an average of 1,176 students and 450 faculty/staff (annualized growth over four years) is needed. These increases in population will have an impact on the demand for additional housing and services in the unincorporated area of Santa Barbara County by significant levels. Moreover, these impacts have not been adequately quantified, as the unincorporated areas of Goleta and Isla Vista are not disaggregated from the City of Goleta in most discussions. According to the DEIR Table 4.10-3, 40-46% of UCSB students live in Isla Vista (This is inconsistent with Table B.11 in the Draft LRDP which says that 40% of students live in Isla Vista). This means an additional 470 to 540 students and 20-25 faculty/staff may locate in Isla Vista over this four-year period. In fact, this additional population represents a new increment of growth that will not be entirely accommodated until the final LRDP housing projects are constructed, which could be twenty years into the future. This new increment does not account for any increases to the base population of students (70% off-campus) that is likely to occur due to a portion of undergraduate students that may need more than four years to graduate.
This new increment of growth will increase the demand for housing, parking, public safety, and other public services throughout the life of the LRDP. According to the Parking Study referenced in the RDEIR, 83% of students living is Isla Vista own vehicles. Most faculty and staff can be assumed to own vehicles. This indicates that the demand for and additional 400 – 450 parking spaces will likely have an impact on Isla Vista parking and circulation conditions, which are severely constrained currently. Additionally, this new increment of growth will place pressure on existing non-student residents’ ability to afford the cost of housing, as lower vacancy rates and heightened demand for housing will drive rents above the current rate of $1,000 - $1,400 per bedroom for student housing in Isla Vista.

This negatively impacts the ability of the County to achieve the Isla Vista Master Plan’s (IVMP) Housing Goal to produce new housing that is affordable to all sectors of Isla Vista, including area workers and families who are unaffiliated with UCSB. IVMP Housing Policies 2, 4, and 5 are negatively impacted by this unaddressed increment of growth, as overcrowding will expedite dilapidation of the housing stock and large student populations could crowd out long-term residents. This new increment of growth also negatively impacts the County’s’ Housing Element Policy 1.10.4, under which Isla Vista constitutes an important community for meeting the unincorporated area’s regional housing needs.

**Alternative Mitigation Measure that is Adequate and Feasible**

The most effective way to mitigate these impacts is to ensure that new housing accommodates growth in student enrollment and faculty/staff is provided prior to the actual presence of these populations. Currently, the mitigation is unclear and calls for ensuring that accommodations are provided within annual or four-year periods. The following should be incorporated into LRDP Mitigation POP-3A to ensure that the impact remains less than significant:

- To ensure that sufficient housing accommodations are planned appropriately, the County requires that the LRDP and the EIR include a phasing plan and development schedule that shows when residential projects will be phased, and demonstrates how this phasing correlates with anticipated UCSB workforce and student growth.

- To ensure that sufficient housing accommodations have been provided, the County requires that all NOIDs demonstrate affordability and suitability of the proposed space. Notices should include all items illuminated in the LRDP, as well as housing types and tenures, proposed rents or sale prices of units, targeted population served by the units, the number of units in a project, and the jurisdiction within which the project is located to ensure that units will be affordable to UCSB workforce and students, and will not induce growth in Isla Vista.

- UCSB is required to provide an annual report summarizing all NOIDs, along with the other information relevant to the new development, to the County and all other jurisdictions by February 1 of each year, so that this information may be included in the Housing Element section of each appropriate jurisdiction’s General Plan Annual Report to the Legislature.

- The findings supporting whether sufficient housing capacity has been demonstrated will be based on the information provided in the NOIDs and UCSB’s annual report. If a finding has been made by the UCSB Planning Director that sufficient housing capacity has been demonstrated, this finding must be supported by the County Board of Supervisors. Otherwise, UCSB will contribute to the Isla Vista Affordable Housing Trust Fund and the Isla Vista Parking Fund.

- The items noted above should be incorporated into the 2008 LRDP Notice of Impending Development (NOID) language and associated DEIR mitigations.
Pop Comment #18. 4.10.2.4. Cumulative Impacts and Mitigation Measures

LRDP Impact POP-4: The LRDP will create direct and indirect growth that will add to the demand for housing in the County. This will have significant impacts that are capable of being mitigated. As the RDEIR notes, the annual average rate of growth in population exceeds the rate of growth in housing throughout the County. This fact places pressure on vacancy rates, increases rents and housing costs, and increases competition for affordable housing, particularly for very low and low income households. The proposed LRDP will worsen this situation in several ways.

As noted in POP-4, the LRDP will drive employment growth in other industries through the induced effects of workforce and student spending, as well as capital spending. At least 2,214 new jobs will be created as a result of the implementation of the LRDP (estimated based on new total of 11,071 induced jobs in Section 6.21). The vast majority of these jobs will be in the retail, hospitality, and service sectors, which are some of the lowest paying industries in the County. Based on salary information from the 2006 UCSB Economic Outlook, salaries for the hospitality and retail industries averaged $23,000 per worker, and salaries in the services industry averaged $42,000 per worker. Retail and hospitality workers could afford to pay $680 per month for housing, whereas service industry workers could afford to pay $1,180 per month. Clearly, workers that occupy these jobs will place increased demand on the County’s stock of rental housing. Those who are unable to find housing will be forced to commute from outside of the area, thereby impacting the roadway system and contributing to traffic congestion, air quality and greenhouse gas emissions.

Additionally, a large portion of the UC workforce is likely to remain on the South Coast through retirement, adding to the demand for housing that is created by existing and new members of the UC workforce. Even though newly hired staff would be provided with housing through the projects in the 2008 LRDP, as much as 72% of the current University workforce is expected to retire, and a large portion of these retirees are likely to remain on the South Coast. For those retiring members of the UCSB workforce that are currently housed on-campus, their re-entry into the private market place represents an additional increase in demand for housing.

In sum total, indirect growth inducing impacts from job creation and UC retirement are estimated to total 12,105 persons per the computation below:

Indirect Job Creation: 2,214 Jobs  
No. of Jobs Per Household: 1.2 Jobs  
No. of Job Creation Households: 1,845 Hslds (2,214 Jobs/1.2 Jobs)  
No. of UC Retirees: 3,373 Persons (4,685 * 72%)  
No. of UC Retire Households: 2,811 Hslds (3,373 Persons/1.2 Jobs)  
Total No. of Indirect Households 4,656 Hslds (1,845 Job Hslds + 2,811Retirement Hslds)  
Total No. of Indirect Persons: 12,105 Persons (4,656 Hslds x 2.6 Persons)

Alternative Mitigation Measure that is Adequate and Feasible

LRDP Mitigation POP-4A should be modified to ensure that the resulting impact is mitigated to a less than significant level. The modification below should accomplish this.

- House 100% of the current and future UC workforce and student population on the UCSB campus, so as to relieve direct and indirect induced pressure on the County’s housing stock. This will reduce demand for housing and enable the 2,214 new workers that occupy jobs induced by UCSB, along with UCSB retirees, to find housing within the existing housing stock.
• Provide housing for more UCSB students. Currently only first-year undergraduate students are guaranteed on-campus housing. If UCSB were to extend this guarantee to even just first and second-year students, the impacts on the surrounding housing stock would be lessened.
4.13 Transportation

Trans Comment #1  General Comment

The 2008 LRDP proposes a substantial amount of growth for its student population, faculty, staff and academic space. Implementation of the proposed UC Santa Barbara LRDP would degrade County of Santa Barbara intersection and roadway operations near the campus to unacceptable levels. Comments provided below address the traffic impact analysis and adequacy of proposed mitigation measures identified in the Draft EIR. Furthermore, the DEIR should disclose the assumption made in the baseline impacts as part of this DEIR for the pending development of North Campus.

This section also needs to differentiate impacts, mitigations, monitoring and supporting discussion between affected jurisdictions. Currently, the identified impacts use and contain different jurisdictions within the RDEIR proposed mitigations and supporting discussion. This inaccurate description of existing conditions is confusing and results in mitigation measures that are not supported by clear data or other supporting evidence. Further, the mitigation measures themselves, even if they were based on accurate and reasonable data are ineffective. Also, the DEIR should identify all reasonable and feasible measures to ensure implementation of improvements that would mitigate the large impacts that the project will cause. Under the 1990 LRDP, the relocation of the main UCSB entrance from El Colegio Road to Mesa Road was proposed as mitigation to traffic and air quality impacts. This mitigation was never implemented and, as such, residual traffic impacts persist. The 2008 LRDP DEIR does not describe the clear cumulative impacts that are caused by the residual traffic problems and the foreseeable impacts caused by the project. The DEIR should detail how mitigation will reduce these significant cumulative transportation impacts, how these measures will be implemented and measures to ensure their full execution.

As noted under Population and Housing herein (POP Comment 18: 4.10.2.3. LRDP Impact POP-4), indirect impacts attributable to the 2008 LDRP total 12,105 persons. Indirect impacts attributable to the University must be addressed in addition to the 11,106 persons directly attributable to UC growth. As a consequence, traffic modeling is compromised and the conclusions in the REIR are based on faulty assumptions and thus are not supported by substantial evidence. Insofar as the air quality and transportation/circulation sections are interdependent, corresponding deficiencies must be corrected and resulting effects must be evaluated.

Finally, a number of the mitigation measures, such as “LRDP Mitigation TRAFFIC-4A,” do not ensure effectiveness through a quantitative analysis. Such analysis is required for the EIR to be deemed adequate.

Trans Comment #2  4.13.1.1 Roadway System

Please use the proper names of the Caltrans facilities mentioned in the DEIR and RDEIR: SR 217 and US 101. Please revise both documents to be consistent in this usage throughout.

Trans Comment #3  4.13.1.1 Roadway System

The DEIR and RDEIR should be clear that the Community of Isla Vista is in the unincorporated portion of the County of Santa Barbara and is subject to the County Comprehensive Plan, the Coastal Land Use Plan, the Goleta Community Plan, and the Isla Vista Master Plan.
Trans Comment #4  4.13.1.1 Roadway System

The County initially commented that the DEIR omits discussions of Isla Vista roadway operational issues such as level of service and safety impacts associated with bicycle traffic and pedestrian traffic. Of particular significance, the intersection level of service (LOS) at Embarcadero Del Norte and Pardall Road is greatly influenced by east-west bicycle pedestrian traffic. The County stated how the DEIR must provide a level of service analysis, discuss and analyze sensitivity to increases in pedestrian and bicycle volumes, and discuss and analyze impacts caused by creating several vehicular access points to the main UCSB campus from Isla Vista roadways.

The RDEIR attempted to address this by stating that there is no national standard for intersection analysis with a mix of bicycles, pedestrians and cars. However, the bicycle volume is not considered in the intersections other than showing signal warrant criteria based on bicycle and pedestrian volumes. The Institute of Transportation Engineers’ (ITE) “Manual of Transportation Engineering Studies” shows that there are several methods that could be used including delay studies, queue studies, etc. These types of studies should be used to help the reader and decision maker form an understanding of how the intersections are performing. The absence of any national standard specifically does not excuse UCSB of preparing the required analysis to determine the expected impacts related to high volumes of pedestrians and bicycles to intersections.

Trans Comment #5  4.13.1. Roadway Systems

Traffic Volumes: Although traffic counts were added to Appendix 4.13-1 to augment the recirculated section analysis, the County is concerned that the counts were taken in May 2006 for internal campus roadways and intersections, and in February 2007 for City of Goleta and for freeway facilities. No new counts were done. Also, the counts do not show pedestrian or bicycle volumes. A reason is presented on Page 4.13-4 for why new counts were conducted more than 2 years ago. However, considering that a sufficient EIR requires traffic counts to be conducted within one year time frame, the result should be updated to ensure a valid traffic count for an EIR traffic study.

Trans Comment #6  4.13.1. Roadway Systems

Traffic Volumes: The document identifies eleven (11) study intersections analyzed in the am peak. All intersections that were analyzed in the pm peak should also be analyzed in the am peak for project specific impacts as well as fair share contributions to cumulative impacts.

Trans Comment #7  4.13.1 Study Intersections

The document should rely on the Isla Vista Master Plan and the Goleta Community Plan for study intersections in Isla Vista.

Trans Comment #8  4.13.1.1 Study Intersections

US 101/SR 217 and US 101/Fairview Avenue interchanges should be added/noted as primary interchanges serving the UCSB campus in the 4th paragraph on page 4.13-1.

Trans Comment #9  4.13.1 Traffic Volumes

On Page 4.13.4, the first paragraph mentions that several additional facilities were analyzed in the RDEIR. These additional facilities should be listed.
Trans Comment #10 4.13.1 Traffic Volumes

To determine roadway and intersection performance the document performs an analysis during the pm Peak Hour, only performs a partial analysis of the am Peak Hour. The document reports that this decision was based on analysis of roadway volumes on Storke Road and Ocean Road. Ocean Road is within the UCSB campus and has no relevance to the regional roadway network. Storke Road may have little significance related to the regional roadway network depending on where the data was taken, which is not disclosed. If the data was collected near the intersection of El Colegio Road, then primarily UCSB related traffic would be captured. The document needs a thorough am Peak Hour analysis because regional impacts to roadways that are not just in UCSB or immediately adjacent to UCSB need to be analyzed.

Trans Comment #11 4.13.1 Traffic Volumes

The volume to capacity (V/C) calculations in Table 4.13.8 and Table 4.13-41 are incorrect for City and County roadway segments. The analysis incorrectly uses the LOS C threshold volume instead of the roadway design capacity volume to calculate volume to capacity. These tables should be revised with the correct V/C information.

Trans Comment #12 4.13.1 Bicycle and Pedestrian Facilities

The document proposes to designate at least five east-west routes from Isla Vista to the Main Campus (Page 4.13-25 and Figure 4.13-4A and B) for bicycle/pedestrian uses. This may impede the flow of traffic in Isla Vista, as bicycle users typically do not obey traffic controls. By spreading the east-west bicycle routes throughout the area, it would be very hard for northbound and southbound motorists to cross both protected and unprotected intersections. Instead, UCSB should designate less impeding bicycle routes using Pardall Road/Sueno Road and design them as a Bicycle Boulevards (bikes, pedestrians, and other non-automobile modes of transportation only).

Trans Comment #13 4.13.1 Bicycle and Pedestrian Facilities

Bicycle and Pedestrian Facilities: Under past LRDPs, UCSB has implemented an effective and comprehensive circulation system for bicyclists and pedestrians, as shown in Figure 4.13-4A and B. However, it is unclear if this existing system will be maintained under buildout of the LRDP. Readers of the DEIR would benefit from the maps shown as figures 4.13-4a and 4.13-4b being modified to show both existing and proposed bicycle routes. Proposed building footprints should be displayed on these maps to indicate where the existing system would be eliminated and how the new proposed system would link with existing system elements. This would aid in the full disclosure of known impacts and ability of identified mitigations to lessen these impacts.

Trans Comment #14 4.13.1 Bicycle and Pedestrian Facilities

The proposed diversion of bicycle traffic from Pardall Road to parallel routes would result in causing two additional intersections (El Greco and Cordoba Road) to warrant a bicycle signal. The impacts are identified but no mitigation is proposed. Impact fees or intersection enhancements should be included as necessary and new mitigation measures should be added.

Trans Comment #15 4.13.1.4 Parking

The document omits an analysis of the impacts associated with the non-resident vehicles parking as close as possible to UCSB occupying available space closer to the main campus. The document also omits a discussion of how any increase in Isla Vista non-resident parking impacts spread to the west. The methodology presented in the document suggests that a percentage of any increase in student population...
will mean an increase in non-resident Isla Vista Parking. The document does not provide this data and an associated analysis of potential impacts.

The document implies that the County could mitigate these impacts for UCSB by implementing a community parking permit program. UCSB is responsible for mitigating the impacts of the proposed LRDP and the document should discuss past failed attempts to implement a parking permit program due to opposition from many groups including the State of California Coastal Commission, which indicates that a parking permit program in Isla Vista implemented by the County is not feasible. UCSB shall be responsible for the implementation and management of any on campus parking permit program since UCSB is responsible for mitigating impacts of their development plans.

Additionally, a free or subsidized campus parking permit program that encourages faculty, staff and students to utilize UCSB-provided parking through cost-savings may be viable to reduce the need for free parking in Isla Vista and surrounding neighborhoods. So long as the University charges for on-campus parking, Isla Vista will be the natural choice of UCSB users insofar as off-campus parking is free. A reasonable and feasible mitigation measure would be to equalize the cost of parking on and off-campus as well as the construction of additional on-campus parking to accommodate overall demand. In this regard, all on-campus parking could be made free of charge by the University and a user charge could be added to enrollment fees to recoup the cost of maintenance.

Trans Comment #16 4.13.1.4 Parking

The RDEIR does not address the percent utilization, turn-over, and inventory of parking in Isla Vista. The document does not specifically address, quantify or mitigate how the added faculty, students, and staff parking in Isla Vista will exacerbate the existing conditions and deficiencies largely caused by UCSB related parking on the streets of Isla Vista. The document provides no discussion regarding UCSB related parking typically filling in all available spaces near the University and the impacts this has to resident and business parking.

Trans Comment #17 4.13.1.4 Parking

Isla Vista students are not allowed to purchase parking permits for the proposed parking structures because they live too close to campus to qualify. However, given the identified underutilization of campus parking spaces and proposed new parking spaces, a parking pass for long term car parking should be made available to resident students residing in Isla Vista. Since many students store their cars in Isla Vista while they access campus for academic and commercial purposes, the option of on-campus long term parking for UCSB students who live in Isla Vista may help mitigate the impacts of UC students parking in the community.

Trans Comment #18 4.13.1.4 Parking

According to the parking survey contained in the document, 25.4% of the available parking (approximately 3,480 total spaces) in the neighboring community of Isla Vista is used on a daily basis. Another 11.4% of the available parking spaces in Isla Vista is frequently occupied by UCSB campus residents and faculty/staff. An additional 12% of parking spaces is occupied occasionally and 22.4% of spaces is used approximately once per month. If the seldom and occasional users decide to park on days that the daily and frequent drivers occupy the community’s parking spaces, 71.2% of all the available parking in the community would be occupied by UCSB residents and faculty/staff. The usage of available parking in Isla Vista currently may range from 25.4% to 71.2% on any given day. This is unquestionably a current and significant impact on the Isla Vista community. This significant impact to the community reduces available parking for residents, businesses, and coastal visitors.
The proposed parking program does not address the current impacts from current UC Santa Barbara development nor mitigate for future impacts. Since there are constraints on available parking space on campus to serve the current population, it can be assumed that approximately the same percentages of new campus residents and faculty/staff would choose to park in the neighboring community. The community does not currently have the available parking capacity to handle demand created by existing and proposed UC development. Further, offering main campus parking for a fee will not fully mitigate impacts to coastal access since the majority of coastal access parking will be located in Isla Vista where there is not a fee for parking. So long as the University charges for on-campus parking, Isla Vista will be the natural choice of UCSB users insofar as off-campus parking is free. A reasonable and feasible mitigation measure would be to equalize the cost of parking on and off-campus as well as the construction of additional on-campus parking to accommodate overall demand. In this regard, all on-campus parking could be made free of charge by the University and a user charge could be added to enrollment fees to recoup the cost of maintenance.

Since the Coastal Commission has denied the County’s parking permit program for Isla Vista and parking is therefore to remain free for the foreseeable future, the LRDP must address its impacts to the community through mitigation fees and/or provision of parking in or near the community. The analysis does not include discussion of the multiple vehicle households that will likely be added with proposed faculty/staff and graduate student housing. Consideration should be given to the parking demands of families that will occupy new faculty, staff and graduate student housing and the commensurate increased parking demands in Isla Vista.

Trans Comment #19 4.13.1.4 Parking

The RDEIR should include a discussion of the economic climate that may lead to increased pressure on people to park off-campus rather than pay the cost of permit for the campus parking spaces. As noted above, reasonable and feasible mitigation measures include the elimination of on-campus parking fees and/or banning off-campus parking for registered students, faculty and staff. Both alternatives would be the University’s responsibility to implement.

Trans Comment #20 4.13.1.4 Parking

The DEIR/RDEIR references a study indicating that as much as 28% of students and an additional 1% of resident faculty/staff residing on the Main Campus use Isla Vista for parking despite the availability of on-campus parking. It may be assumed that a similar percentage of new resident students, faculty and staff will choose to park in Isla Vista rather than pay for UC campus parking. This is a significant impact to an area that is already significantly impacted by current UC development.

As previously noted, the document asserts that 25.4% of the available parking spaces in Isla Vista is used by UC Santa Barbara campus residents, faculty and staff on a daily basis. Another 11.4% of the available parking spaces is frequently occupied by UCSB campus residents and faculty/staff. An additional 12% of parking spaces are occupied occasionally and 22.4% of spaces is used approximately once per month. If the seldom and occasional users decide to park on days that the daily and frequent drivers park in the community, 71.2% of all the available parking in the community would be occupied by UCSB residents and faculty/staff. The proposed 2008 LRDP, in combination with existing baseline conditions attributable to UCSB, will create considerable cumulative impacts. There is a current significant impact to the community that will be further impacted by the proposed development.

The discussion in this section includes a suggestion that the County implement a parking permit and enforcement program for Isla Vista but also notes that a previous County parking permit proposal was not approved by the Coastal Commission. The RDEIR concludes that this impact is therefore unavoidable. The conclusion is not supported by the facts. As noted above, reasonable and feasible mitigation measures include transportation demand strategies which have effective and document impacts on automobile
dependent transportation, such as subsidized mass transit, etc. The absence of reasonable and specific mitigation measures that would measurably reduce automobile dependency render ambiguous mitigation shifting measures to cooperate on developing a Isla Vista parking program as simply inadequate.

Trans Comment #21 4.13.1.4 Parking

Of the 3,650 parking spaces proposed to be added to the current stock, the University is planning to only provide on additional 100 parking spaces for commuter use on Main Campus. The limited parking spaces provided for the Main Campus are not proportional for the magnitude of proposed development. The amount of parking increase provided should bear some relationship to the programmatic increases and physical development planned in the LRDP to appropriately mitigate parking impacts to Isla Vista.

Specific parking impacts to the Isla Vista Community are not addressed in RDEIR. A significant amount of the campus daily use and residential parking demand is currently occurring on public roadways in the Isla Vista area. Programmatic enrollment and staffing increases, without associated parking or transportation provisions, will increase demand for parking in Isla Vista as well as resultant traffic increases associated with the search for available parking. A comprehensive parking demand, supply, & management study for the Isla Vista Community should be provided to identify adequate mitigation to the impact of additional parking demand on the neighboring communities.

Trans Comment #22 4.13.1.4 Parking

The parking study did not examine the am (7-9) and pm (4-6) peak hours similar to the traffic study in Isla Vista. This approach would show the correlation between the am. and pm. peak travel times and to be consistent with the Isla Vista parking analysis. Without this analysis, the RDEIR fails to adequately assess the impacts of peak traffic conditions on parking availability.

Trans Comment #23 4.13.1.4 Parking

Parking histogram: Page 4.13-32: This chart should be expanded to include the am and pm peak hours to be consistent with the analysis period of interest and to be consistent with the Isla Vista parking study, which did include the roadway peak hours of operation. Without this analysis, the RDEIR fails to adequately assess the impacts of peak traffic conditions on parking availability.

Trans Comment #24 4.13.1.4 Isla Vista Parking

Table 4.13-18: This table provides the reader with survey information and statistical data. The table should be expanded to provide the reader with a margin of error in the interest of full disclose consistent with CEQA.

Trans Comment #25 4.13.1.4 Isla Vista Parking

Table 4.13-18: The total responses for Non-UCSB/Non-Isla Vista Housing do not track with “Have a car while at UCSB” as they do in the previous columns. It also seems odd that all of the total responses for this column also do not have an on-campus permit. Additionally, the “total surveyed” does not appear to be a summation of the data in the columns. These omissions result in unreliable data which can not be adequately assessed for impacts to the regional transportation and parking network.

Trans Comment #26 4.13.1.4 Isla Vista Parking

Table 4.13-19: This table provides statistical data that is not clearly presented. The table should make it clear that an average weighted utilization rate based on the number of school days per month was used. For reference, County staff calculates this rate to be approximately 32%. The paragraph following table
4.13-19 provides data that calculates to a rate of 25% (885/3480) and page 4.13-40 claims a utilization rate of 40%. The data in this section should be reevaluated for consistency and a standard methodology should be applied to the survey results that does not ignore the user groups that park in Isla Vista on a less than often basis.

Trans Comment #27 4.13.1.4 Goleta Beach Parking

Table 4.13-20: This table provides statistical data that is not clearly presented. The table should provide an average weighted utilization rate that is based on the number of school days per month. The data in this section should be reevaluated for consistency and a standard methodology should be applied to the survey results that does not ignore the user groups that park at Goleta Beach on a less than often basis. Percentages were calculated based on total surveyed, not total responses. For people who did not respond, it is not known where they parked. Percentages should therefore be taken based on the total responded. Therefore, Table 4.13-20, which reflects the total population, is also incorrect.

The University should pursue reasonable and feasible mitigation measures for impacts to coastal beach access at Goleta Beach, including but not limited to the funding of parking enforcement staff to ensure that UCSB commuters do not occupy parking spaces designated for coastal recreation.

Trans Comment #28 4.13.1.4 Parking

Proposed LRDP Parking: The LRDP states that since “new students and faculty/staff would reside in University owned housing under the LRDP, additional parking on the main campus for commuters would be minimal”. Unless there are restrictions placed on the new students, such as prohibiting cars for students living on-campus, it should be assumed, and documented numerically, that there will be an increase in parking demand in Isla Vista and surrounding communities. The University should consider a new policy restricting cars for new enrollment and/or the development of permitted remote lots for undergraduate student long-term and daily parking to deter parking in adjacent parking spaces in Isla Vista and Goleta Beach.

Trans Comment #29 4.13.1.4 Parking

The DEIR and 2008 LRDP propose to increase the available parking from 1 space for every 4.6 students to 1 space for every 4 students. However, Tables 4.13-12 and 4.13-13 indicate an average parking utilization rate between 66% and 80%. Given that 60% of UCSB students have personal vehicles, it is reasonable to assume that the proposed population growth and academic space increases will require additional parking spaces beyond the proposed 3,650 under the 2008 LRDP.

Trans Comment #30 4.13.1.5 Campus Travel Characteristics

Mitigation in the DEIR places significant value on the UCSB TAP program to help mitigate impacts associated with buildout of the LRDP. To assess the effectiveness of this mitigation, figures regarding existing TAP utilization under current campus characteristics need to be provided. If mitigation relies on the success of expanding program elements to mitigate for LRDP traffic impacts, then information needs to be provided to assess how the existing program is performing.

Trans Comment #31 4.13.1.5 Campus Travel Characteristics

Table 4.13-25: This table is based, in part, on the results of a 2002 survey. The results of this survey are outdated and are not applicable due to their age. The students who answered this survey in 2002 have graduated. Current student, staff and faculty responses are necessary for the proper analysis. The DEIR should be revised to reflect a current survey, no more than two years old.
Trans Comment #32 4.13.1.6 Local Goals & Policies

In addition to the Isla Vista Master Plan, this section should include references to the County of Santa Barbara Goleta Community Plan Transportation Policies and the Goleta Transportation Improvement Plan (GTIP) policies and implementation strategies.

Trans Comment #33 4.13.1.6 Local Goals & Policies

While never completed under the 1990 LRDP, the designated improvements of Mesa Road that were agreed upon in the 1990 LRDP Mitigation Implementation Agreement should be completed. This would help mitigate impacts to the relatively few regional east-west roadways. Mesa Road can then become a local access road to the Main Campus. LRDP Policy TRANS-8 should be amended to state “Mesa Road shall be widened...” as this is a critical transportation corridor. In addition, consistent with mitigation proposed by the County in Section 4.3 Biology, any widening of Mesa Road should not encroach into designated Environmentally Sensitive Habitat Areas (ESHA).

Trans Comment #34 4.13.2.2 Analytical Method

Throughout the document, potential new roadway connections between Isla Vista and the main campus are referenced, discussed and considered as potential mitigation. However, roadway connections are not part of the 2008 LRDP and the County has no intention to plan, construct, or maintain these roadway connections. The RDEIR states: “The roadway connections between Isla Vista and the Main Campus are not proposed as part of the 2008 LRDP” (Page 4.13-76). Therefore, the discussions and road connection references should be removed from the DEIR document and not considered as potential mitigation to traffic and circulation impacts.

Trans Comment #35 4.13.2.2 Analytical Method

Figure 4.13-7: Although the Proposed Roadway Improvement and Additional Study Intersection Map have been updated in the RDEIR, this figure could show existing and proposed lane geometrics at each intersection under the LRDP. This would indicate what will happen at each intersection in a graphical format that should be easier to understand. Alternately, an additional map would allow more detail to explain the improvements on a finer scale.

Trans Comment #36 4.13.2.2 Analytical Method

The analytical method discussion in LRDP section 4.13.2.2, states that the Isla Vista Master Plan has not been submitted to the Coastal Commission. However, the plan was submitted to the Coastal Commission on November 20, 2007 and is currently in the review process. This analysis is not sufficient to draw the conclusions that are made in the RDEIR.

Trans Comment #37 4.13.2.2 Analytical Method

The analysis includes 41 intersections for the pm peak hour, but it only analyzed 11 intersections for the am peak hour. The document should analyze all 41 intersections for both am and pm peak hour conditions. Although some of the area roadways and intersections show more total traffic during the pm peak hour, the am traffic volumes indicated at the selected locations show much stronger directional movements and higher one-way traffic flows especially toward the campus in the am peak hour. Critical traffic conditions near college campuses are more likely to be found during the am peak hour, since the majority of students take classes that begin during am peak period, while relatively few classes end during the pm peak period. It is more likely that traffic impacts would be found during the am peak hour, especially for intersections within or near the campus. Thus, the analysis to be conducted for am peak hour is very important to determine the impact of the project.
In addition, to identify potential project impacts or cumulative impacts, the study area should have included the following areas:

- Roadway segments and major intersections along Cathedral Oak Road,
- (Additional) roadway segments and major intersections within the Isla Vista Community
- Roadway segments and major intersections within County of Santa Barbara unincorporated areas, northeast of the campus

In general, the LRDP traffic study area should be determined based on the CMP criteria and study guidelines for UCSB, City of Goleta, Isla Vista Community, County of Santa Barbara, and Caltrans. The recirculated study added five (5) arterial intersections, ten (10) ramp junctions, and one (1) street segment for the analysis. However, no additional am peak hour analysis and no intersections along Cathedral Oak Road and within Isla Vista Community have been added. This omission renders the analysis inadequate in determining the impacts of the 2008 LRDP on the local transportation network.

**Trans Comment #38 4.13.2.2 Analytical Method**

Table 4.13-33 indicates that the LRDP will generate a total of 27,276 daily trips with 1,604 am peak hour trips and 2,170 pm peak hour trips. The adequacy of the trip rate (for instance, the trip rate from students’ apartments) should be presented. Table 4.13-28 of the DEIR proposes 25% internalization (reduction) of trips within the Main Campus. However, the 25% trip reduction of the daily and am and pm peak hour volumes cannot be replicated based on the assumption. In addition, Table 4.13-31 fails to provide detailed information on how the trips for the 25% internalization of trips between Storke & West Campus Housing & Main Campus have been calculated. It is likely that such internalized trips will leave one side of the campus and use streets in the Isla Vista Community to travel to the other side of the campus. The EIR may thus underestimate traffic impacts on streets in Isla Vista and on El Colegio Road by reducing the traffic generation forecast based upon internalized trips both within Main Campus and between Main Campus and remote campuses.

The trip generation and internalization assumptions are the factors which ultimately generate the “fair share” calculations related to impacts to intersections and roadway segments. The University’s fair share calculation if applied to County cost estimates to transportation facilities come to a total of approximately $1.9 million dollars. The University’s flawed fair share calculation ignores community standards related to Levels of Service and the County’s projection that these facilities would operate at or above accepted levels of service without added 2008 LRDP trips. The cost of maintaining Levels of Service at intersections and along roadway segments as a result of LRDP impacts must be wholly borne by UCSB. The County estimates the transportation improvements needed for the multi-modal approach to accommodating LRDP growth to be approximately $90 million dollars.

**Trans Comment #39 4.13.2.2 Analytical Method**

Project trip distributions are not provided in the RDEIR. A traffic study and traffic impact section of an EIR must indicate roadways that are expected to experience traffic increases and the numerical traffic volumes associated with the project on each roadway. The project trip distribution should be based upon an objective source or reliable origin/destination study. For this study the traffic model should provide a select zone analysis indicating the distribution of project trips and the resultant traffic volumes in the am and pm peak hours. The study documents provided do not allow for the identification of the volume of traffic increase associated with each roadway, because the volumes are not documented and the traffic model can unintentionally mask project traffic increases during the traffic assignment process, thus underestimating the traffic volumes and potential impacts.
Trans Comment #40 4.13.2.2 Analytical Method

The report mentioned bicycle and pedestrian issues on and off campus. It also suggests designating five new east-west connections between Isla Vista and the Main Campus (Page 4.13-24) for bicycle/pedestrian uses. The plan also proposes to discourage use of Pardall Road, which is the main bicycle route connecting the Isla Vista Community to the main campus, passing through an underpass into the campus aligned with the main east/west bicycle corridor within the campus.

The plan to deemphasize Pardall Road is not advisable. Bicycle users often do not obey stop signs and other static traffic controls. By spreading the bicycles on other roadways throughout the area, it will become more difficult for northbound and southbound motorists to travel through intersections with more frequent east/west bicyclists. The LRDP should continue to encourage bicycles to use Pardall Road/Sueno Road, and these roads should be further enhanced as Bicycle Boulevards to provide the most appropriate method of circulation for bicyclists. The Isla Vista Community Master Plan should be further referenced in order to properly plan for and participate in the improvement projects for Isla Vista. The task of managing the extremely high bicycle traffic volumes between Isla Vista and the campus will be greatly complicated by de-emphasis of the Pardall bike route and the proposed elimination of the grade separation of Pardall Road at Ocean Road.

In addition, the intersection analysis did not consider the impact of bicycle movements at several locations where their inclusion would seriously affect the results. For instance, the intersection of Pardall Road at Embarcadero Del Norte is shown as LOS B during the existing pm peak hour. This is because all east/west bicyclists were excluded from the traffic count used for the analysis. If bicycle volumes were counted and properly considered, we believe that the intersection would be evaluated at LOS F under existing conditions based on field review of traffic flows and delays to the stopped street movements. We estimate that up to 20,000 bicycle trips per day are being made along Pardall Road on a typical school day. LRDP growth and the modal assumptions made in the traffic analysis and the lack of modeling intersection friction by bicycles does not accurately determine the levels of significance, and therefore do not properly provide reasonable and feasible mitigation measures.

Trans Comment #41 4.13.2.2 Analytical Method

With regard to forecasted turning movement volumes for all scenarios illustrated on Figure 4.13-8 through 4.13-11, the methodology for explaining why the southbound left turn volumes for intersection #15 are decreased by 110 vehicles from “2025 No Project” to “2025 With LRDP Conditions” should be disclosed. Also, an explanation is needed as to why the westbound volumes for intersection #34 are decreased from the existing condition to 2025 No Project conditions. This type of reduction should not occur given the assumptions of the LRDP’s traffic model. Many forecasted turning movement volumes for all scenarios illustrated on Figure 4.13-8 through 4.13-11 do not appear reasonable. Specifically, the volumes for intersection #37, #38, and #40 show negative volumes from existing to 2025 No Project conditions, which implies traffic conditions will improve. The DEIR should disclose the assumptions and reasons for this type of discrepancy.

Trans Comment #42 4.13.2.2 Analytical Method

Table 4.13-29: UCSB Housing Summary: The table should be revised to include the net difference between each scenario (i.e., existing to cumulative, cumulative to cumulative plus LRDP).

Trans Comment #43 4.13.2.2 Analytical Method

The intersection and roadway analysis in the RDEIR for the roadway geometric conditions did not assume the completion of the County of Santa Barbara’s and the City of Goleta’s roadway improvements under the GTIP. The completed improvements should be considered as baseline conditions; future improvements
should not be considered as either baseline conditions or as mitigations for the impacts of the 2008 LRDP. The planned and completed improvements of the GTIP are intended to service populations under build out assumptions exclusive of the 2008 LRDP. New trips and associated traffic impacts must be assessed independently from the planned improvements of local jurisdictions.

Trans Comment #44 4.13.2.2 Analytical Method

The RDEIR identifies substandard levels of service at the regional intersections under 2025 no project conditions. This is not true since both the City and the County have approved infrastructure improvement programs and are currently collecting fees for improvements to retain acceptable LOS at these intersections and roadways. This table misrepresents the LRDP impacts to the surrounding infrastructure since it does not take into account the baseline improvements approved in the Goleta Transportation Improvement Plan (GTIP). This table should be revised to reflect implementation of the approved GTIP improvements as a baseline for the projects proposed at the 2025 transportation scenario.

Trans Comment #45 4.13.2.2 Analytical Method

The RDEIR reports Mesa Road/Los Carneros Road is stated to operate at LOS E under 2025 conditions. The County GTIP identifies this intersection to operate at LOS C or better with the implementation of the GTIP improvement. The RDEIR should be revised to reflect a revised LOS under 2025 assuming completion of the Mesa Road/Los Carneros Road GTIP project.

Trans Comment #46 4.13.2.2 Analytical Method

In reviewing the calculation worksheets, a few intersections may be calculated incorrectly. For example, the intersection of Fairview Street at 101 Northbound Ramp shows incorrect geometry conditions. The Intersection of Camino del Sur at El Colegio has stop control placed along El Colegio instead of Camino Del Sur for the analysis. Errors in calculations of level of service can result in failure to properly identify deficiencies and impacts, and, therefore, the environmental impacts analysis is inadequate.

Trans Comment #47 4.13.2.2 Analytical Method

The RDEIR should list mitigation measures for each intersection based on the traffic patterns disclosed, and should illustrate the improvements on a geometry improvement figure. As it is, the scope and extent of improvements required may be underestimated. For example, if two turn lanes are required as a mitigation measure, the receiving roadway must have two lanes. This may result in the need to provide additional lanes on roadway segments continuously from one intersection to another.

Trans Comment #48 4.13.2.2 Analytical Method

Although the RDEIR includes a preliminary list of needed improvements to mitigate the impacts of the 2008 LRDP, the projected cost and feasibility of these improvements is not disclosed or analyzed. The RDEIR proposes to pay the County of Santa Barbara a “fair-share” of the cost to mitigate the impacts to transportation within the jurisdiction. In order to calculate a fair-share, the total cost of needed improvements should be disclosed. Furthermore, the proposed fair-share calculation should be based on the am and pm peak hour project volume contributions. The RDEIR propose a fair-share payment methodology and no cost estimates have been provided. As noted throughout these comments, the University’s flawed analytical approach and fair share calculation grossly underestimate the intersections and roadway segments that require improvements to maintain approved Level of Service.
Trans Comment #49 4.13.2.2 Analytical Method

The RDEIR should discuss and analyze anomalies in the existing traffic counts provided through verification of the raw traffic counts. If the raw counts have been adjusted for the analysis, please provide the location and methodology of the adjustment. Specify the assumptions of the ICU methodology for signalized intersection analysis methodology, e.g., the saturation flow and lost time assumptions.

Trans Comment #50 4.13.2.2 Analytical Method

A detailed Trip Generation and Distribution Study should be included in the technical appendices.

Trans Comment #51 4.13.2.2 Analytical Method

Student Housing trip generation estimate of 2.16 average daily trips (ADT) per student appears to be underestimated considering observed patterns in Isla Vista. For instance, Santa Catalina housing residents have a history of driving to classes on campus or parking close to campus in Isla Vista to avoid walking, riding a bike, or taking the bus. The RDEIR should assess the reported estimate of ADT for remote campus housing uniquely from the average trip rate and compare against rates observed from other residence halls and published national standards.

Trans Comment #52 4.13.2.2 Analytical Method

Tables included in the document do not reflect the phase-specific trip generation based on the project description. A new table should be added that shows projected trips associated with each proposed phase of development of the 2008 LRDP.

Trans Comment #53 4.13.2.2 Analytical Method

The document fails to provide project-specific trip distribution figures. In addition, no project-specific traffic volume figures have been provided either. Of particular concern is the Ocean Rd Housing/Mixed Use Project which has potential for significant auto, bicycle, and pedestrian traffic impacts in Isla Vista. This project should be considered in this RDEIR due to its high level of known detail in the project description as part of the first phases of implementation. Please provide these project-specific data based on a detailed 2008 LRDP phasing plan.

Trans Comment #54 4.13.2.2 Analytical Method

While the City of Goleta’s calibrated traffic model has been used in the analysis and mitigation of transportation impacts, there is no clear discussion of the assumptions or methodology applied in the model. Judging by the large scale and nature of the proposed development, it is reasonable that many assumptions were needed to complete the model and the traffic analysis. Without disclosure of the assumptions and methodology applied, the findings in the RDEIR and the technical appendices are unsubstantiated and, therefore, the RDEIR is inadequate. All assumptions in the methodology should be released in a traffic modeling report for the DEIR and clearly disclosed in Section 4.13. Specifically, the City model does not take into account pedestrians or bicycles in the trip generation. The intrazonal trips in the City model are therefore vehicle trips, from West or Storke campus to the Main campus or vice versa. With the LRDP model being refined to have more TAZs, the trips that were accounted for as intrazonal trips in the City model should be accounted for as internal (TAZ to TAZ) trips in the LRDP model. Also, no volume figures are provided and no model is provided for the new Housing Lag scenario in the appendix.
Trans Comment #55 4.13.2.2 Analytical Method
The RDEIR reports that the City of Goleta traffic model forecasts p.m. peak hour volumes under Year 2030. However, the source for the peak hour trip generation rates is not disclosed or justified in the RDEIR for the land use categories of Student Family Housing Units and Faculty Housing Units. Additionally, the RDEIR does not describe or justify modifications to the trip generation rates specifically for the 2008 LRDP project description. There is no further discussion of how the a.m. forecasts have been generated. Please provide detailed modeling data for am forecasts. These trip generation rate details should be disclosed and explained in the RDEIR. Without these details, the findings and mitigations proposed by the DEIR are unfounded and inadequate.

Trans Comment #56 4.13.2.2 Analytical Method
The RDEIR refers to Appendix 4.13-1 for land use and roadway improvements. No land use data or roadway improvement information was provided in Appendix 4.13.1. Please provide detailed land use assumptions for review.

Trans Comment #57 4.13.2.2 Analytical Method
The RDEIR sentence states that several land use categories were omitted due to negligible changes under different scenarios. In the interest of full disclosure, this information should be disclosed in a tabular format consistent with the requirements of CEQA.

Trans Comment #58 4.13.2.2 Analytical Method
The RDEIR acknowledges that funding for the majority of the roadway improvements is uncertain (i.e., full funding has not yet been identified) and that traffic forecasts and LOS results were developed assuming only the existing roadway network was present. This approach is not acceptable considering the County and the City of Goleta have identified and approved improvements for the planning area and are currently collecting AB1600 fees to construct. The LRDP analysis must assume these improvements as part of the baseline conditions to be consistent with County and City of Goleta Community Plans. The assumption that the infrastructure will never be built is completely unfounded and minimizes the impacts of the LRDP to the surrounding infrastructure, as infrastructure that is already compromised is slated for improvements. The County and City of Goleta have adopted plans and improvements that will maintain LOS C conditions within Goleta planning area under build out conditions. As mentioned in prior comments, the improvements planned by the City of Goleta and the County of Santa Barbara should not be applied as mitigation to the impacts of the 2008 LRDP project.

Trans Comment #59 4.13.2.2 Analytical Method
The RDEIR and transportation analysis should be revised to consider the implementation of the approved GTIP improvements on the region’s transportation network.

Trans Comment #60 4.13.2.2 Analytical Method
This section, and the associated analysis, should be revised to reflect the impacts of the 2008 LRDP on transportation with and without the widening of Hwy 101 to 6 lanes. Though the 6-lane project is identified in the SBCAG 2004 MTP, it is unapproved and unfunded. Therefore, the UCSB may not associate this project as part of baseline conditions when impacts to traffic are assessed.
Trans Comment #61 4.13.2.2 Analytical Method

Vehicle Miles Traveled (VMT) Comparison: The RDEIR provides an analysis of potential increases in VMTs resulting from implementation of the 2008 LRDP as related to commute distances and housing trends, but it fails to identify linkages with AB32, SB375, and other air pollution policy, planning, a regional goals. Specifically, this section should explain the linkages and provide analysis of air quality impacts related to VMTs in the Section 4.2: Air Quality of the DEIR.

Trans Comment #62 4.13.2.2 Analytical Method

The list of proposed LRDP roadway improvements is internally inconsistent regarding how proposed improvements to El Colegio Rd. are treated. The RDEIR suggests El Colegio Rd. is assumed to be improved from County funding sources. As yet, no funding source for improvements to El Colegio west of Los Carneros has been finalized. UCSB impacts to this section of roadway/intersections, assuming existing conditions, should be determined.

Trans Comment #63 4.13.2.2 Analytical Method

The RDEIR indicates that the City of Goleta traffic model forecasts pm peak hour volumes for Year 2030. There is no further discussion with how the am peak hour forecasts have been generated. Detail modeling data and methodology for both am and pm peak hour forecasts should be provided. Although City of Goleta traffic model documentation is available, the land use data, the zone structure and the highway network have been updated/modified for the UCSB LRDP project. Information on the approach to and extent of modeling inputs should be furnished to insure that model updates have been properly made.

The City of Goleta Traffic model provides only peak hour traffic volumes on roadway links, while intersection turning movements are required to evaluate traffic level of service. The methodology for transforming link volumes into intersection turning movements should be identified and documented. Some methodologies may inappropriately reduce traffic volumes during the process of preparing turning movement forecasts. Also, the process of refining the peak hour link forecasts to address local inconsistencies and anomalies in the forecast should be indicated.

It is indicated that Year 2025 traffic forecasts were developed by addition of traffic growth between the base year and Year 2025 models to existing traffic counts for the study facilities. Please provide the detail post-processing worksheets for review. The methodology may not apply to future new intersections and/or locations which experience significant roadway circulation changes.

Trans Comment #64 4.13.2.2 Analytical Method

It is clear that the focus of this section of the RDEIR is an analysis of the relative changes in traffic associated with changes in campus development associated with the proposed LRDP. This is perhaps appropriate for identification of the incremental impacts of the changes proposed by the LRDP; however it does not consider the additional impacts of planned development permitted under the existing LRDP. The impacts of a development, per CEQA, should not be reduced by dividing the project into phases and analyzing the incremental development of each phase, especially when a large amount of development is identified by the current plan. Therefore, pending projects of the existing LRDP should be included in baseline conditions. At minimum, additional traffic resulting from the existing LRDP should be included in the assessment of cumulative impacts and the relative contribution of UCSB to cumulative traffic growth in the area.

Intersections in or near the campus are highly affected by this issue. The traffic analysis shows minor contributions to total traffic increases at locations such as Los Carneros Road at Phelps/Mesa Road, however virtually all traffic increase at this intersection would be attributed to UCSB campus growth.

Attachment B: Santa Barbara County Comment Letter, March 30, 2009
UCSB Vision 2025 LRDP & EIR SCH # 2007051128
Additionally, as noted under Population and Housing herein (POP Comment 18: 4.10.2.3. LRDP Impact POP-4), indirect impacts attributable to the 2008 LDRP total 12,105 persons. Indirect impacts attributable to the University must be addressed in addition to the 11,106 persons directly attributable to UC growth. As a consequence, traffic modeling is compromised and the conclusions in the REIR are based on faulty assumptions and thus are not supported by substantial evidence. Insofar as the air quality and transportation/circulation sections are interdependent, corresponding deficiencies must be corrected and resulting effects must be evaluated.

Trans Comment #65 4.13.2.2 Analytical Method

With regard to the calculation of UCSB’s proportional fair share of specific improvements in Table 4.13-52, the County has the following comments:

1) The list of improvements is exclusive of improvements the County believes are needed in other areas of the Goleta Valley to mitigate the impacts of the 2008 LRDP, specifically segments and intersections along Hollister Ave and Cathedral Oaks. Please see Table 1 of this comment letter section for the County’s assessment of impacts and related costs based on the adopted GTIP and additional mitigation.

2) The percentage “fair share” identified does not comport with what the County has assessed as the actual contribution of trips based on the information provided in this RDEIR. With an overall increase of 29,266 daily trips external to main campus and the fact that relatively little development is proposed by the County of Santa Barbara or the City of Goleta in these areas, it is reasonable to assume that any improvements required to the area’s roadway network to accommodate the 2008 LRDP develop will be caused primarily by these additional trips. Table 4.13-52 reports that the University is only responsible for at most 21.9% of the future traffic volume increases. The County is concerned that the traffic model for the 2008 LRDP is under-projecting the traffic volume increases and distribution without justification. Please see Table 1 of this comment letter section for the County’s assessment of impacts and related costs based on the adopted GTIP development impact fee structures and additional mitigation costs.

3) The RDEIR assumes that the percentage of future increased traffic volumes on area roadways attributable to the 2008 LRDP should determine the percentage of the cost to improve the roadway or intersection. This is not an appropriate approach to the mitigation. Since the County of Santa Barbara and the City of Goleta has adopted thresholds for acceptable levels of service, based on V/C ratios, the planned transportation improvements are intended to maintain acceptable service for the network based on long-range land use planning. The UCSB unplanned contribution to the transportation network will breach the adopted thresholds. Therefore, the cost of any additional improvements, other than those planned as part of the GTIP, are 100% attributable to UCSB for the contribution to local roadway network.

4) Of particular concern, intersections in or near the campus are highly affected by increased trips and delays. The traffic analysis shows minor contributions to total traffic increases at locations such as Los Carneros Road at Phelps/Mesa Road, however virtually all traffic increases at this intersection would be attributed to UCSB campus growth.

Trans Comment #66 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

The RDEIR should add City of Santa Barbara to the participating agencies due to the existence of the Airport and the regional nature of bus lines utilized by UCSB.

Trans Comment #67 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

LRDP Mitigation TRAFFIC-2A: The 2008 LRDP will have significant impacts to Santa Barbara County, specifically in Isla Vista, intersections and roadway operations due to increased demand from autos, bicycles and pedestrians. Increases in faculty, staff, and students, even those living on campus, result in...
increased traffic in Isla Vista, particularly bicycle and pedestrian related trips. It is reasonably foreseeable that LRDP development will utilize the Isla Vista transportation network for a portion of their trips, particularly via El Colegio Rd. to transport UCSB populations between the many campuses of UCSB. However, impacts to the Isla Vista transportation network are not assessed in the RDEIR, and no mitigations are proposed. The RDEIR should be revised to propose improvements to County roadways in Isla Vista and the Goleta Valley to benefit future auto, bicycle and pedestrian trips as part of the 2008 LRDP.

Alternative Mitigation Measure that is Adequate and Feasible

In 2006 the County of Santa Barbara, Department of Public Works completed the Isla Vista Sidewalk Study. The purpose of this study was to identify strategies for improving sidewalks in Isla Vista between the UCSB Main Campus western boundary and Camino Pescadero. The study determined that it would cost approximately $20,166,000 to improve the sidewalks’ conditions and connectivity. The improved sidewalk network will be necessary to safely serve the increased pedestrian traffic associated with build out of the proposed LRDP, and it would be consistent with the Isla Master Plan. The sidewalk improvements are a portion of the approximately $90 million dollars in improvements that are specified in the County’s June 23, 2008 comments which are being re-submitted for reference.

Additionally, the County of Santa Barbara’s Goleta Community Plan and Isla Vista Master Plan envisions bicycle and roadway improvements totaling approximately $174,405,000, which will primarily serve University populations (See Table 1 of this comment section). Of particular importance is the Isla Vista Master Plan’s intended bicycle boulevards to provide adequate facilities for the community’s cyclists. UCSB is expected to support these adopted plans with their own and pay its fair share of these types of improvements as a major developer in the area.

The proposed mitigation is inadequate because it does not appropriately address the physical impacts associated with the increases in bicycle and pedestrian traffic that will occur in Isla Vista.

The following mitigation measures should be incorporated into the DEIR to ensure that the impacts of the proposed LRDP remain less that significant:

1) Provide funding to implement all transportation improvements as specified in the County’s June 23, 2008 comments on the 2008 LRDP and DEIR and in Table 1 of this submission.

Trans Comment #68 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

The DEIR discussion acknowledges significant impacts from a delayed housing scenario. These impacts from proposed development can be mitigated through preparation of a phased development and construction plan to be realized prior to increased enrollment. By not increasing enrollment until adequate housing is in place, the potential impacts are greatly reduced and the temporary housing scenarios and corollary transportation impacts are not disclosed, analyzed, or mitigated.

Trans Comment #69 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

The removal of Pardall tunnel and replacement with an at-grade intersection on the roadway poses a significant impact that may need more analysis and proposed mitigation. The increased traffic from new high-density residential development along Ocean Road and location of parking structures on Ocean Road will significantly increase traffic. Coupled with high levels of traffic, the proposed removal of the tunnel under Ocean Road and replacement with intermingled bicycle and pedestrian cross traffic may lead to significant congestion and potential for undesirable impacts. The proposed intersections and traffic flow management require further analysis.
Trans Comment #70 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

The discussion of removal of the Pardall tunnel should include a discussion of any potential historical significance, impacts and proposed mitigation if necessary.

Trans Comment #71 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

Proposed bike and pedestrian paths should be designed to accommodate skateboard and scooter traffic. According to the UC Santa Barbara 2006 study cited in RDEIR Section 4.13.1.5, Campus Travel Characteristics, 21% of students that reside at UCSB, Isla Vista, and Goleta travel by foot, skateboard or scooter. The proposed circulation plan should include a discussion of accommodating all modes of non-vehicular transportation.

Trans Comment #72 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

The LRDP identifies proposed 'Isla Vista Connections' to improve access to the campus along the proposed Ocean Road development. A majority of the east-west Isla Vista roadways currently ‘dead end’ for vehicles but allow for pedestrian and bicycle passage from UCSB campus. The County has no plans to open these roadway connections between UCSB and Isla Vista for automobile, bus, or service vehicle through-traffic. All references to “Isla Vista roadway connections” as mitigation for potential LRDP-related traffic impacts should be removed from the DEIR and the RDEIR. Isla Vista connections are not proposed as part of the LRDP and the County has not agreed to build these vehicle connections. As such, these improvements should not be included in the discussion of impacts or proposed mitigations and they are not reasonably feasible.

However, should UCSB choose to pursue these connections regardless of the County’s recommendation, it is unclear in the RDEIR if these connections are proposed to allow vehicular access between Ocean Road and Isla Vista. If these connections are proposed to allow vehicular access, the RDEIR must analyze the impacts of increased trips through Isla Vista, especially on Isla Vista intersections. The RDEIR does not evaluate potential impacts associated with the proposed Isla Vista Connections and should be revised to address this omission.

Alternative Mitigation Measure that is Adequate and Feasible

Provide funding to the County to construct all improvements necessary to impacted transportation system to meet the adopted County levels of service policies should UCSB pursue development of any roadway connections between Isla Vista and UCSB’s main campus that allow vehicular traffic.

Trans Comment #73 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

The potential impacts of introducing the bicycle and pedestrian cross traffic to the new vehicle traffic from proposed residential development and parking structures along Ocean Road is not adequately addressed in the RDEIR. The additional traffic generated from the new intersections may greatly increase vehicle and bicycle congestion and lead to increased cars parking in the community of Isla Vista to avoid long wait and pose a threat to bicycle and pedestrian safety.

Trans Comment #74 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

The RDEIR states that a significant impact would occur on County of Santa Barbara roadways operating at LOS C if the 2008 LRDP project increased daily traffic volumes by 1%. However, the DEIR should clarify that any increase in traffic related to a 2008 LRDP project that creates LOS “C” on County roadways or LOS “D” on Isla Vista roadways should be considered a significant impact, as these LOS standards are the County’s adopted thresholds for traffic impacts.
Trans Comment #75 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

In conjunction with the development of Mesa Road as a primary east-west road at Los Carneros, a new east-west corridor could serve the local UCSB circulation needs while alleviating traffic pressures on regional roadways as alternate routes for UCSB-related traffic. This option should be analyzed in the RDEIR.

Trans Comment #76 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

Tables 4.13-42 and 43: The tables provided misrepresent the impacts of the LRDP since the 2025 No Project scenario does not take into account the approved County and City GTIP improvements. Please revise these tables to reflect LOS operations with the approved improvements.

Trans Comment #77 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

Although Cathedral Oaks Road is a major collector, it is extremely sensitive to volume and speed impacts because of its residential nature for much of the route. For this reason, it is critical to the County that UCSB mitigate traffic impacts to east-west routes in the immediate campus area to avoid spillover as congestion occurs. The DEIR needs to specifically discuss impacts to all east-west roadways in the region and propose specific mitigation measures. Of particular importance are the operations of Hwy 101 and Hollister Ave., which typically handles spillover traffic from Hwy 101 during peak hours and special events. The DEIR should include a discussion regarding the operation of each east-west roadway including analysis and discussion of impacts to Cathedral Oaks Road when breakdowns in levels of service occur on the limited number of alternative east-west routes.

Trans Comment #78 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

LRDP Impacts TRAFFIC-1 - 6 discussion and analysis and their proposed mitigations are inadequate. No evidence is provided to prove that LRDP Mitigation TRAFFIC-1-6 will mitigate the impacts identified in the RDEIR. The County has the following comments regarding the proposed mitigation measures for LRDP Impact TRAFFIC-2, as well as other impacts proposed to be mitigated by the following:

1) Monitoring of transportation conditions is not a mitigation measure for the impacts identified. The proposed mitigation is unacceptable. Monitoring alone does not provide a measurable and definable reduction in the significance of impacts to a less than significant level. A monitoring program for traffic conditions should be proposed in addition to proposed mitigation to ensure that the implementation of the mitigation is effective as the 2008 LRDP is developed, not as mitigation alone.

2) Transportation demand management measures should be specific in types, and relate to quantifiable direct impact reduction. The proposed mitigation is unacceptable. This mitigation measure does not provide a measurable and definable reduction in the significance of the impacts to a less than significant level. This mitigation measure does not clearly define a target LOS for the campus intersections. The mitigation measure should be revised to reference the adopted LOS standard for intersection operations on campus and/or for local jurisdictions. The mitigation measure should be refined to provide a specific project that demonstrates a quantifiable reduction in vehicle trips to identified intersections that is backed by a documented analytical methodology.

3) The proposed mitigation is unacceptable. Coordination with another jurisdiction does not provide a measurable and definable reduction in the significance of impacts to a less than significant level. While the County desires to participate in an effort to cooperatively mitigate impacts created by the 2008 LRDP, absent any specific comprehensive, ongoing mitigation agreement, pledges to work with the County as mitigation are entirely inadequate.
4) Although the RDEIR commits UCSB to paying a proportionate share of mitigating significant impacts to identified intersections and roadways, the mitigation measure states that contribution will include one or more of the following:
   a) Alternative transportation enhancements
   b) Payment of fair-share of improvements based on the methodology presented in this study
   c) Payment towards or construction of all or a portion of specific roadway improvements
      (especially those that directly benefit University related transportation)

The County finds these proposed mitigations to inadequately guarantee that the improvements needed to support the transportation needs of UCSB in the local area and the region will be funded by UCSB and not by County taxpayers. This mitigation measure should be revised to state “Contribution shall include the following, but is not limited to:” to ensure that the fair-share payment to cover the full costs of mitigation to transportation facilities as outlined in the County’s June 23, 2008 comment letter.

Additionally, as phases of the LRDP are permitted/constructed, a development impact fee agreement should be agreed upon with the County to fund the cost of improvements at the time of construction to mitigate the impacts that occur within each phase. Please quantify the share of current degradation due to current unmitigated UC Santa Barbara development. Please propose a timeline and mitigation for the current impacts as well as proposed new impacts. LRDP Impact TRAFFIC-2, associated impacts and supporting discussion need to remove all references to the City of Goleta, as the City is a separate jurisdiction from the County of Santa Barbara.

**Alternative Mitigation Measure that is Adequate and Feasible**

1) UCSB shall pay the County of Santa Barbara development impact fee\(^4\) (AB 1600) for transportation pursuant to the Development Impact Fee (AB-1600) as currently calculated by the County of Santa Barbara to mitigate the impacts of the 2008 LRDP to transportation levels of service and facilities, and as calculated by the County of Santa Barbara at the time of the issuance the Notice of Impending Development (NOID), and

2) UCSB shall pay the fair share for the ongoing cost for funding this public service in the amount of $76,700 and shall be revised annually by a percentage equal to the adjustment equal to the annual percentage change in the April Consumer Price Index (“CPI – All Urban Consumers) for the Los Angeles-Anaheim-Riverside Region. Adjustments shall be increased up to the nearest five-cent increment. Adjustments shall automatically become effective on the first day of November at which time payment is due each year without amendment. The payment of UCSB’s fair share of ongoing costs may be offset by direct revenues specifically generated by UCSB and its related population in Isla Vista as described in Attachment C.

**Trans Comment #79 4.13.2.3 2008 LRDP Impacts and Mitigation Measures**

“Enhance and promote existing TDM measures” are supportable goals. However, the analysis to support the conclusion of a 10% overall reduction as identified in this mitigation is unsupported by any specific programs or mitigation measures. The mitigation is speculative. Though the recirculated section proposed text edits, no supporting evidence for the 10% trip reduction is provided

**Alternative Mitigation Measure that is Adequate and Feasible**

Mitigation should contain at least the following parameters to gauge potential success. Sample Mitigation: Given past documented performance of the existing TAP program, funds will be expended on an annual basis by department[s] on the following specific TDM elements: Although text related to fair share payments and a 1-year timeline has been added, the use of subsidized transit passes, car share vehicles, bicycle facilities, etc. while working with outside jurisdiction not changed.
Other reasonable and feasible mitigation measures include source reduction through: (i) the requirement that all on-campus residents of University housing be prohibited from owning their own automobile; and (ii) imposition of a refundable registration fee for students who voluntarily relinquish ownership of an automobile. In the case of the second measure, for students and faculty that retain ownership of a vehicle, the registration fee paid by such individuals could be applied toward capital improvements necessary to mitigate traffic impacts or toward the funding other TDM measures. This amounts to a user fee that is charged to persons who contribute to the impacts.

Trans Comment #80 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

It is inadequate to propose specific mitigation of adverse impacts through a future study/work effort. The proposal to “work with” outside jurisdictions is vague and the value of mitigation against adverse impacts cannot be evaluated or quantified. The mitigation must contain specific milestones related to funding levels, timelines and specific transit programs. These comments provide a significant number of mitigation measures that if implemented would have a measurable impact at reducing environmental impacts.

Trans Comment #81 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

The reference to “alternative transportation enhancements” is not specific and the value of mitigation against adverse impacts cannot be evaluated or quantified. The mitigation is vague and must contain specific milestones related to funding levels, timelines and specific transit projects, such as the transit projects identified in Table 1 below.

Trans Comment #82 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

The intersections identified for mitigation monitoring should include the intersections of El Colegio/Los Carneros and Storke/El Colegio since the 2008 LRDP will have a significant impact on these roadways and intersections.

Trans Comment #83 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

As illustrated by road patterns depicted Figure 1 of this comment letter, mitigation to east-west roadways is imperative to prevent major impacts at already poorly operating locations. The RDEIR should address the limited east-west roadways in the region. An analysis should be performed that considers all of the east-west regional roadways including each route’s sensitivity to breakdowns in levels of service. Roadways such as Cathedral Oaks Road, US 101, and Hollister Avenue should be analyzed. The RDEIR mitigation is inadequate and ineffective in these areas. UCSB should mitigate their impacts by assisting the County of Santa Barbara with necessary improvements to the County transportation infrastructure necessary to mitigate impacts to traffic and air quality as outlined in these comments and those submitted in June 2008. Additionally, project-specific mitigations may also be necessary to ensure that project specific impacts are less than significant.

Alternative Mitigation Measure that is Adequate and Feasible

UCSB shall pay the County of Santa Barbara for its fair share of improvements to County of Santa Barbara transportation infrastructure including, but not limited to, intersection and roadway segment improvements as numerated below in Table 1.
TABLE 1, Section 4.13: Transportation Comments  
COUNTY OF SANTA BARBARA  
DEPARTMENT OF PUBLIC WORKS  
Transportation Division  
2008 UCSB LRDP Transportation Mitigation Payment Calculation  
May 22, 2008

<table>
<thead>
<tr>
<th>Projected Required Mitigation Projects</th>
<th>Estimated Cost</th>
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<tr>
<td><strong>ROADWAYS</strong></td>
<td></td>
</tr>
<tr>
<td>1 Los Carneros Road Widening</td>
<td>$4,000,000</td>
</tr>
<tr>
<td>2 Phelps Road Extension</td>
<td>UCSB</td>
</tr>
<tr>
<td>3 Fowler Road Extension</td>
<td>City of Goleta</td>
</tr>
<tr>
<td>4 Storke Road Widening</td>
<td>$4,000,000</td>
</tr>
<tr>
<td>5 Hollister Widening from San Antonio Road to SR 154</td>
<td>$19,700,000</td>
</tr>
<tr>
<td>6 Turnpike Road Widening from Calle Real to Cathedral Oaks Road</td>
<td>$6,500,000</td>
</tr>
<tr>
<td>7 US 101 Widening – 6 Lanes from Storke Road to Fairview Road</td>
<td>Caltrans</td>
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<tr>
<td><strong>SUB-TOTAL:</strong> $34,200,000</td>
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<tr>
<td><strong>INTERSECTIONS</strong></td>
<td></td>
</tr>
<tr>
<td>8 Los Carneros Road/Mesa Road Intersection Improvements</td>
<td>$2,750,000</td>
</tr>
<tr>
<td>9 Hollister Avenue/Storke Road Intersection Improvements</td>
<td>City of Goleta</td>
</tr>
<tr>
<td>10 El Colegio Road/Storke Road Intersection Improvements</td>
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</tr>
<tr>
<td>11 Turnpike Road/Calle Real Intersection Improvements</td>
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</tr>
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<td>12 Hollister Avenue/Patterson Avenue Intersection Improvements</td>
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</tr>
<tr>
<td>13 Hollister Avenue/Storke Road Intersection Improvements</td>
<td>City of Goleta</td>
</tr>
<tr>
<td>14 Hollister Avenue/Los Carneros Road Intersection Improvements</td>
<td>City of Goleta</td>
</tr>
<tr>
<td>15 Traffic Signals – Various Locations (4 Intersections)</td>
<td>$1,800,000</td>
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<tr>
<td><strong>SUB-TOTAL</strong> $11,550,000</td>
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<tr>
<td><strong>NEIGHBORHOOD TRAFFIC MANAGEMENT</strong></td>
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<tr>
<td>16 Traffic Calming Devices</td>
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<td><strong>SUB-TOTAL</strong> $750,000</td>
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<tr>
<td><strong>INTERCHANGES</strong></td>
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<tr>
<td>17 US 101/SR 217/Patterson Avenue Interchange Improvements</td>
<td>Caltrans</td>
</tr>
<tr>
<td>18 US 101/Storke Road/Glen Anne Road Ramp Intersection Improvements</td>
<td>Caltrans</td>
</tr>
<tr>
<td>19 US 101/Los Carneros Road Ramp Intersection Improvements</td>
<td>Caltrans</td>
</tr>
<tr>
<td>20 US 101/Fairview Road/Calle Real Interchange Improvements</td>
<td>Caltrans</td>
</tr>
<tr>
<td>21 US 101/Turnpike Road Ramp Intersection Improvements</td>
<td>Caltrans</td>
</tr>
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<td>22 US 101/Hollister Avenue Interchange Improvements</td>
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<td><strong>ISLA VISTA</strong></td>
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<td>23 Embarcadero Loop Roadway Improvements</td>
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<td>24 El Embarcadero Roadway Improvements</td>
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<td>25 Camino Pescadero Roadway Improvements</td>
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<td>26 Sabado Tarde Roadway Improvements</td>
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<tr>
<td>27 Camino Del Sur Roadway Improvements</td>
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<td>28 Pardall Road from Embarcadero Del Norte to UCSB</td>
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<td>29 Del Playa Drive Roadway Improvements</td>
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<td>30 Embarcadero Del Norte/Pardall Road Intersection Improvements</td>
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<td>31 Embarcadero Del Mar/Pardall Road Intersection Improvements</td>
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<td>32 El Embarcadero Intersection Improvements</td>
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<tr>
<td>33</td>
<td>Isla Vista Traffic Calming</td>
</tr>
<tr>
<td>34</td>
<td>Isla Vista Sidewalks – Sidewalk In-Fill Various Locations</td>
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<tr>
<td></td>
<td><strong>BIKEWAY IMPROVEMENTS</strong></td>
</tr>
<tr>
<td>35</td>
<td>San Jose Creek Class I Bike path - Cathedral Oaks to Hollister</td>
</tr>
<tr>
<td>36</td>
<td>San Jose Creek Class I Bike path - Hollister Ave. to Goleta Beach</td>
</tr>
<tr>
<td>37</td>
<td>Ekwill St. Class I Bike path - Ekwill to Maria Ygnacia Creek</td>
</tr>
<tr>
<td>38</td>
<td>Patterson Ave Class II Lanes-Hollister Ave to Atascadero Creek Bike Path</td>
</tr>
<tr>
<td>39</td>
<td>Patterson Ave Class II Lanes - Cathedral Oaks to Calle Real</td>
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<tr>
<td>40</td>
<td>Obern Trail - Pedestrian Trail, Bikepath</td>
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<td>41</td>
<td>San Antonio/Maria Ygnacia - Class I Bike path Improvements</td>
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<tr>
<td>42</td>
<td>San Pedro Class I Bike path - From Fowler Road to Goleta Beach</td>
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<tr>
<td>43</td>
<td>Bike Racks and Bike Lockers - Various Locations</td>
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<td>44</td>
<td>Bikeway Signage Program-Continue On - Going Bikeway Signage Program</td>
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<td>45</td>
<td>Class I Bikeway Lighting - Illuminate Key Class I Facilities</td>
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<td><strong>SUB-TOTAL</strong>:</td>
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<td><strong>TRANSIT IMPROVEMENTS</strong></td>
</tr>
<tr>
<td>46</td>
<td>Purchase Battery Chargers - 5 Battery Chargers for Recharging Shuttles</td>
</tr>
<tr>
<td>47</td>
<td>Purchase of Shuttles - New Transit Route, Patterson/Turnpike-4 Shuttles</td>
</tr>
<tr>
<td>48</td>
<td>Purchase of Busses - New Transit Route, Santa Barbara/Fairview Express</td>
</tr>
<tr>
<td>49</td>
<td>Purchase of Busses - 2 New busses to maintain Trunk Line Level of Service</td>
</tr>
<tr>
<td>50</td>
<td>Bus Stops - Construct Bus Stops, Turnouts &amp; Pavement Reinforcement</td>
</tr>
<tr>
<td>51</td>
<td>Passenger Boarding Improvements - Provide ADA Access Improvements</td>
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<tr>
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<td><strong>SUB-TOTAL</strong>:</td>
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<td><strong>SIDEWALK IMPROVEMENTS</strong></td>
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<tr>
<td>52</td>
<td>Hollister Avenue, Puente Drive, Etc.</td>
</tr>
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<td><strong>SUB-TOTAL</strong>:</td>
</tr>
<tr>
<td></td>
<td><strong>PLAN ADMINISTRATION</strong></td>
</tr>
<tr>
<td>53</td>
<td>Model, Cost Estimates and Fee Calculation Updates</td>
</tr>
<tr>
<td>54</td>
<td>Project Study Reports</td>
</tr>
<tr>
<td>55</td>
<td>Future Plan Administrative Costs</td>
</tr>
<tr>
<td></td>
<td><strong>SUB-TOTAL</strong>:</td>
</tr>
<tr>
<td></td>
<td><strong>TOTAL</strong>:</td>
</tr>
</tbody>
</table>

Notes:
The County of Santa Barbara, Department of Public Works reserves the right to revise this improvement list and total cost estimates provided above, as well as revise the payment calculation shown below. Significant mitigations including project specific mitigations may be identified as further information is obtained from the University of California, Santa Barbara.

Projects listed for jurisdictions other than the County of Santa Barbara were included to disclose in full the improvements needed to mitigate impacts to the operations of the County transportation network.

Projects shown in bold are included in the current Goleta Transportation Improvement Plan (GTIP).
### UCSB LRDP Transportation Mitigation Payment Calculation:

<table>
<thead>
<tr>
<th>Description</th>
<th>Quantity</th>
<th>Calculation</th>
<th>Amount</th>
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</thead>
<tbody>
<tr>
<td>Trips - Remaining in Current Plan (1,841) Plus UCSB LRDP (7,282)</td>
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<td>9,223</td>
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<tr>
<td>Revised Peak Hour Trip Cost (Current Plan plus UCSB LRDP)</td>
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<td>$12,240</td>
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<tr>
<td>0.62 PHTs/Apartment x Revised GTIP Fee</td>
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<td></td>
<td>$7,589</td>
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<tr>
<td>LRDP Proposed Apartments</td>
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<td>2,961</td>
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<td><strong>Sub-Total:</strong></td>
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<td></td>
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</tr>
<tr>
<td>0.52 PHTs/Townhouse x Revised GTIP Fee</td>
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<td></td>
<td>$6,365</td>
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<tr>
<td>LRDP Proposed Townhouses</td>
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<td></td>
<td>1,874</td>
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<td><strong>Sub-Total:</strong></td>
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<td></td>
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<tr>
<td>2.54 PHTs/1000 Sq. Ft.</td>
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<td>$31,090</td>
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<td>Proposed Square Feet (1000s)</td>
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<td><strong>Sub-Total:</strong></td>
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<tr>
<td>Total UCSB LRDP Transportation Mitigation Payment*</td>
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<td><strong>$90,360,545</strong></td>
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*Total Mitigation Payment subject to changes annually by Construction Cost Index (CCI)*

The above project list is based on the Goleta Transportation Improvement Plan (2007 Cost Estimates Update) and the Isla Vista Sidewalk Initial Study (County of Santa Barbara, Department of Public Works, 2006). Mitigation measures for UCSB LRDP impacts to any and all County of Santa Barbara transportation facilities listed above, as shown in TRANS Comments Figure 1 below and as proposed in all of the comments in this document are subject to further refinement as UCSB provides more information.
Trans Comment #84 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

The number of County intersections included in the traffic impacts analysis is inadequate, particularly in Isla Vista. It is reasonably foreseeable that proposed Campus growth could be to increase UCSB trips by an estimated 25-35%. That level of increase will have impacts to County roadways and intersections throughout the South Coast.

Alternative Mitigation Measure that is Adequate and Feasible

An analysis of all Isla Vista intersections on Embarcadero Del Norte for the proposed project should be provided within the document in tabular form and must disclose and mitigate the inevitable decrease in service and associated impacts on air quality, noise, and surrounding resources at these Isla Vista intersections and roadways. Furthermore, the “with project” analysis should include a discussion and analysis of the seven proposed roadway connections to Ocean Road from the Isla Vista area. Please note that the County of Santa Barbara has no plans of developing vehicle connections between Isla Vista and UCSB’s main campus.

Trans Comment #85 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

The RDEIR proposes the payment of the University’s fair share of the cost of improvements to mitigate impacts to traffic in the County of Santa Barbara. However, the RDEIR fails to provide estimated costs from adequate fair-share calculations based on quantifiable traffic volume contributions. Additionally, cost estimates for foreseeable intersection improvements are also missing from the report. The cost of improvements and a proposed fair share agreement and payment should be assessed and disclosed as part of the mitigation proposed in the RDEIR.

Trans Comment #86 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

The RDEIR provides discussions of mitigation measures without consideration or analysis of consequences should proposed mitigation goals not be met. Additionally, the RDEIR does not propose any specific monitoring to ensure adequate mitigation. The document attempts to leave it up to UCSB to determine which, if any, fees it will pay for transportation mitigation measures. The document should specify specific impacts to off-campus transportation facilities and propose specific mitigation measures that could range from directly mitigating the impact to paying fees to a regional transportation improvement plan so the University is paying its fair share to improve a transportation facility.

Trans Comment #87 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

According to the DEIR, significant development is still pending under the 1990 LRDP, including 976 beds, 151 student family units, and 172 faculty and staff units, as conditions under 2025 No Project. However, these increases in development and population are not considered as part of the baseline population for the RDEIR analysis. Instead, the RDEIR analysis considers the average enrollment of 20,000 students and 4,685 faculty and staff as the baseline, which inaccurately represents the total UCSB population in the 2007-08 school year. Table 4.13-26 should be revised to depict actual population numbers as the baseline compared to 2025 plus LRDP population projections (5,000 additional students, and 1,700 faculty and staff) for the DEIR impact analysis.

Trans Comment #88 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

UCSB shall provide its fair share payment to all project specific impacts. In areas with multiple modal choice impacts (i.e. bike, pedestrian and vehicle conflicts), the County will consider improvements that offer an
effective solution for all travel modes, provided roadway operations meet the County minimum LOS standard.

**Trans Comment #89 44.13.2.3 2008 LRDP Impacts and Mitigation Measures**

The UCSB LRDP does not assume the completion of the County of Santa Barbara and the City of Goleta’s GTIP roadway improvements. This assumption misrepresents the LRDP impacts to the local roadways since implementation of the improvements maintains LOS C operations under 2025 conditions. The LRDP DEIR should be revised to reflect completion of these approved improvements under the 2025 scenario.

**Trans Comment #90 4.13.2.3 2008 LRDP Impacts and Mitigation Measures**

Table 4.13-42 through Table 4.14-45 documented the intersection analysis results under the With Mitigation conditions. However, those improvements are not included in the bullet lists on Page 4.13-96 through Page 4.13-97. Please list mitigation measures for each intersection and illustrate the improvements graphically.

**Trans Comment #91 4.13.2.3 2008 LRDP Impacts and Mitigation Measures**

The proposed mitigation provides for LOS D operations at the Hollister/Los Carneros intersection. The County and City of Goleta acceptable LOS for intersections is LOS C. Please provide proper mitigation to meet the LOS standards for the applicable jurisdiction.

**Trans Comment #92 4.13.2.3 2008 LRDP Impacts and Mitigation Measures**

The LRDP identifies intersections that are below LOS C under the 2025 scenario. These numbers do not appear to reflect the implementation of the County and City GTIP improvements. Because these improvements are included in approved documents, they should be assumed in place and functional under the 2025 scenario, regardless of funding. Please revise this paragraph to reflect LOS operations with the approved improvements.

**Trans Comment #93 4.13.2.3 2008 LRDP Impacts and Mitigation Measures**

The RDEIR proposes to partially mitigate the impacts to levels of service at the Hollister/Storke Intersection and other local roadways by widening westbound Phelps Road to contain a left, through, and right turn lanes and by constructing the Phelps/Mesa Connection to direct traffic through the Storke Wetlands to connect at Los Carneros Rd. The DEIR claims that these improvements would “also improve peak hour operations” to a level lower than Year 2025 no project conditions. This connection has been contemplated by the County in the adopted GTIP, but the design and construction of the connection and widening would be the responsibility of the City of Goleta, as the proposed improvements lie within the incorporated city limit.

Though the Phelps/Mesa Road widening and connection project has been considered by the County in past and is generally supported, it has not been analyzed for environmental impacts by UCSB or the RDEIR. It is reasonable to assume that the significant impacts of the proposed Phelps improvements may have prohibitive impacts on air quality, traffic volumes, wetland habitat, noise, land use, and neighborhood compatibility aesthetics. Without adequate study, analysis and disclosure of the feasibility of the Phelps Road improvements and all environmental impacts, the widening and connection project does not adequately mitigate the impacts of the 2008 LRDP on local roads serving residential development on Phelps Road.
Alternative Mitigation Measure that is Adequate and Feasible

The RDEIR should analyze the impacts to biological resources, aesthetics, alternative transportation, noise, and air quality resulting from the proposed widening and connection of Phelps Rd. to Mesa Rd as part of the RDEIR. Adequate alternatives should be developed that would alleviate existing and future impacts to traffic levels of service should the Phelps/Mesa Road project be infeasible due to constraints.

Trans Comment #94 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

The RDEIR reflects LOS E operations at the Storke/Hollister intersection under the 2025 scenario. This assumes the approved GTIP improvements are not implemented. Please revise this paragraph to reflect LOS operations with the approved improvements. The approved County and City standard is LOS C.

Trans Comment #95 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

The County has the following comments regarding proposed mitigation measures. In particular, the County is concerned that mitigation payments to local jurisdiction coincide with the rate and type of development under the 2008, as follows:

1) Please clarify the method and timeline for the proposed enhancement and promotion of existing transportation demand management measures. Identify the impact of current development and propose targeted monitoring. If there is a current impact, there is no reason not to identify immediate mitigation measures. Current development impacts may not been adequately mitigated and should be addressed before new development may be considered.

2) UC Santa Barbara development plan mitigation should not rely on maximum potential development considered in the County and City community plans. Mitigations for development in Isla Vista are the responsibility of the individual developer as directed by the regulatory agency. The UC projects are not independent developers but rather the entity itself. Therefore, proposing a proportional share of mitigation that relies on potential development, which itself should require appropriate mitigations for individual projects if and when they are realized, is not an appropriate method of determining mitigation. It would be more appropriate for the complete impacts of the proposed development to be mitigated by the developer (UC Santa Barbara) prior to the construction of the proposed development.

3) The RDEIR proposes contribution of mitigation payments no later than the start of construction. However, mitigation fees should be paid prior to the start of construction to ensure that measures are in place prior to impacts from the development. Efforts should be made to plan so that there is not a lag time between development and impact mitigation.

4) The RDEIR discussion includes neighborhood-serving retail measures as mitigation for traffic impacts. However, adding retail uses to the UC main campus may have its own significant impact to the local economy and negatively affect Isla Vista community businesses. The impacts of this proposed measure must be studied. Please explain how additional commercial uses on the main campus meet the education mission of the UC development plan.

Trans Comment #96 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

It is difficult to evaluate the effectiveness of the proposed mitigation overall because it is unexplained how the improvements will improve connectivity and guarantee reasonable use by UCSB students, faculty, and staff.
Trans Comment #97 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

The RDEIR references significant impacts with no reference to the LOS, actual impact or a mitigation measure to reduce the impacts to a less than significant level. The RDEIR should be revised to reflect the above referenced items to make the impacts and mitigation measures it more apparent to the reader.

Trans Comment #98 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

The proposed mitigation fails to identify who will determine “appropriate transportation facilities.” An actual investment in specific transit projects would be required to provide for measurable transit mitigation. As written, any conclusion of mitigation for adverse impacts is speculative.

The County has provided a list of improvements and calculated UCSB’s fair share contribution in Table 1 to adequately mitigate the impacts to local transportation attributable to the 2008 LRDP.

Trans Comment #99 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

LRDP Mitigation Measure TRAFFIC-10A is inadequate. The UCSB parking survey results (Table 4.13-17 and 4.13-18) indicate approximately 1,530 faculty/staff and students are parking off-campus in Isla Vista and Goleta Beach on a daily or frequent basis. For Isla Vista, this represents 25% (885 spaces) of the on-street parking spaces are being used daily by UCSB affiliates. The DEIR acknowledges off-campus parking intrusion by UC Santa Barbara affiliates. This has historically been a concern due to the close proximity of free parking spaces in Isla Vista and at Goleta Beach.

Alternative Mitigation Measure that is Adequate and Feasible

The LRDP needs to propose specific mitigation measures such as fully accommodating the parking needs of the UCSB faculty, staff and students. The LRDP and DEIR need to discuss the specific impacts to the Isla Vista community and proposed specific mitigation measures such as building more parking spaces and reducing parking fees so using UCSB provided spaces becomes more attractive.

Trans Comment #100 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

LRDP Mitigation TRAFFIC-10A relies on UC Santa Barbara contributing its fair-share towards the implementation of a parking permit program in Isla Vista. As noted on page 4.13-133, Santa Barbara County has attempted to implement a parking permit program in Isla Vista but was unable to receive approval from the Coastal Commission. Due to the future uncertainty surrounding approval of a parking permit program in Isla Vista, the 2008 LRDP & DEIR shall disclose this issue and identify additional mitigation measures to alleviate off-campus parking intrusion in Isla Vista and at Goleta Beach associated with buildout of the LRDP.

Alternative Mitigation Measure that is Adequate and Feasible

Mitigation may include, but are not limited to prohibiting cars for all on-campus residents; providing free on-campus parking for UCSB students, specific alternative transportation measures that have documented efficacy at reducing automobile trips, faculty and staff; designate long term parking versus day parking lot to allow student to store their cars on-campus, alleviate impacted Goleta Beach Parking in Isla Vista; develop additional free parking spaces within UCSB and Isla Vista.

Trans Comment #101 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

As noted in earlier remarks, the County knows of at least one mitigation measure identified in the FEIR for the 1990 LRDP that has not been executed by the University. The measure entails the relocation of the
main UCSB entrance from El Colegio Road to Mesa Road. This was proposed and listed as the mitigation for traffic impacts to El Colegio Road and Isla Vista intersections as well as air quality. The consequence is a large unmitigated residual traffic impact. A second potential violation of the 1990 Mitigation Implementation Agreement is that fact that current UC enrollment exceeds the 1990 cap of 20,000 students by approximately 1,100 persons.

Ongoing mechanisms are needed to ensure that identified mitigation measures are implemented in an appropriate and timely manner. A detailed mitigation reporting and monitoring program is needed and should be furnished as part of the EIR. In addition, the County recommends that the LRDP itself embody policies that reinforce the University’s obligations under CEQA. Sample language is provided below:

“LRDP: Trans-15: The University shall cooperate with the County in devising parking and traffic management strategies to mitigate off-campus impacts. All reasonable and feasible measures necessary to mitigate the impacts of UCSB development and operations on Isla Vista and surrounding areas shall be identified and implemented in conjunction with all new on-site development.”

“LRDP: Trans-16: Prior to undertaking any project covered by the LRDP, the University shall devise and implement an Environmental Quality Assurance Program encompassing two basic components: (i) a Development Component covering the implementation of Mitigation Measures identified in 2008 LRDP Final EIR during the construction phase of the Project; and (ii) an Operational Component covering implementation of transportation demand measures, payment of development impact fees, land management practices and other ongoing mitigation. The Environmental Quality Assurance Program shall be developed in cooperation with the County of Santa Barbara and shall embody the following elements:

1) Project Logistics. The scope, format, methodology, timing and submittal requirements of environmental documentation, pre-construction surveys and associated mitigation.

2) Governmental Permits. The scope, timing and procurement of all permits required for the Project by Responsible Agencies including, but may not be necessarily required by, the U.S. Army Corps of Engineers, Regional Water Quality Control Board, California Coastal Commission, Cal Trans and County of Santa Barbara.

3) Monitoring and Reporting Protocols. The delineation of roles, responsibilities, intervals, frequency and duration of monitoring and compliance reporting by and between the University, Isla Vista community, City of Goleta and County of Santa Barbara.

4) Lines of Authority. Lines of authority, security measures and enforcement responsibilities for managing parking permit programs, transportation demand measures and similar ongoing activities.”

Trans Comment #102 Additional Technical Remarks Specific to RDEIR

- P4.13-20 Table 4.13-10: The Isla Vista Master Plan FEIR and Goleta Community Plan classify Camino Corto, Camino Del Sur, Camino Pescadero, Embarcadero Del Mar, and Embarcadero Del Norte as S-2 roadways as opposed to the LRDP which classifies these road segments as S-1. Please clarify and reconcile.

- Figure 4.13-6: Parking lot color should be revised for Lots 10, 12, 15, 18, 24, 29, and 30.

- P4.13-39, Table 4.13-18: Percentages were calculated based on total surveys, not on total responses. For those who did not respond, it is unknown where they choose to park. In the interest
of statistical integrity, percentages should be calculated based on the total responses to the survey. Under the same assertion, Table 4.13-19 reflecting the total population is inadequate as well.

- P4.13-65, 4th paragraph, second sentence: The RDEIR describes trip generation as based on the counts collected at the existing campus housing, not the campus gateways. However, this methodology does not account for cut-through trips to reach destinations in the area. Please update the text.

- P4.13-65, 5th paragraph, 4th sentence: The RDEIR states “Although many students and faculty/staff typically commute to campus in a mode other than a SOV, they may occasionally drive to campus, which was not reflected in the travel survey results”: But the survey results, Table 4.13-25, has the mode of travel, and also the appendices Tables 6, 7 and 8 which has the inbound and the outbound traffic should include all types of mode. Please reconcile.

- P4.13-66, 2nd and 3rd paragraph: The trip generation calculation, which was based on the actual counts conducted at the existing housing complexes, includes all types of trips (trips to and from the campus or elsewhere). Since real data was used, it is unreasonable to apply a 25% reduction for internalized trips.

- TDF Model: The model did not account for existing bicycle and pedestrian volumes and associated impacts on local transportation systems, and these factors were not forecasted nor taken into account for the analysis of future conditions. Additionally, no model is provided for the housing delay scenario in the appendix. Please describe how these volumes were estimated, and which assumptions were made in the calibration of the traffic model. Also, Year 2025 with LRDP without Proposed Student and Faculty/Staff Housing only analyzed vehicle miles traveled (VMTs). Please explain why other data was not provided.

- Appendix 4.13-3: Model Trip Generation (Page 30) Table 25 and 26: The 2005 City of Goleta traffic model does not take into account the pedestrian or bicycle in the trip generation. The intrazonal trips in the City model must be the vehicle trips, perhaps from West or Storke campus to the Main campus or vice versa. With the LRDP model being refined to have more TAZs, the trips that used to be accounted as intrazonal trips in the City model should be accounted as internal (TAZ to TAZ) trips in the LRDP model.

- Model Validation and Future Forecast: Comparing the traffic volumes along Embarcadero Del Norte south of Pardall Rd and the peak volume of the 2005 pm directional model at the same location, a substantial difference in the volumes was observed. The accuracy of the growth factor (calculated from the 2005 and 2025 model and applying to the existing volumes Feb 2006) is questionable. The same discrepancy is noted for other locations as well. A select zone analysis or a graphic showing the Trip assignment of the new LRDP projects is not included in the RDEIR which is needed to adequately determine the study intersections and roadway segments. Please clarify and reconcile.
4.14 Water Supply

W Comment #1  General Comment

The Goleta Water District articulated methodological shortcomings in the RDEIR analysis and will be offering a wealth of comments on the inadequacy of the water supply and demand analysis contained in the DEIR and REIR. The comments call into question the favorable supply assumptions utilized in the RDEIR as well as the water use factors. The County concurs with the input and comments of the Goleta Water District; in summary, the conclusions in the REIR are based on faulty assumptions and thus are not supported by substantial evidence and fail to provide reasonable and feasible mitigation measures to reduce impacts to the region’s water supply.

W Comment #2  4.14.1.3 Future GWD Water Demand

In order to fully evaluate water supply availability, water supply and demand analysis needs to be based on both annual demand and peak daily demand. Only annual demand is used in the analysis. Please provide additional analysis based on peak daily demand.

W Comment #3  4.14.1.3 Future GWD Water Demand

In calculating future water demand, the number residential units proposed under the 2008 LRDP does not coincide with the total in Tables 4.14-10 through 4.14-13. Together, new residential units shown in these tables add up to 3,304 compared to 5,443 bedspaces and 2,113 dwellings appearing in Table 4.10-21. Please clarify and reconcile.

W Comment #4  4.14.1.3 Future GWD Water Demand

The analysis should consider the future water demand of the secondary/indirect growth associated with the University as identified in Section 6.0: Other CEQA Consideration of the DEIR. As noted under Population and Housing herein (POP Comment 18: 4.10.2.3. LRDP Impact POP-4), indirect impacts attributable to the 2008 LDRP total 12,105 persons. Indirect impacts attributable to the University must be addressed in addition to the 11,106 persons directly attributable to UC growth. These indirect growth projections will cumulatively have an impact on the availability of water to the Goleta Water District area.

W Comment #5  4.14.1.5 Regulatory Context

This discussion needs to disclose that water in excess of those amounts held in the name of local districts is held by Central Coast Water Authority as a drought buffer, and is therefore not available for other uses, including the University’s future needs under the 2008 LRDP.

W Comment #6  4.14.1.6 Cumulative Setting

This section provides no discussion of reasonably foreseeable projects to be considered in the Cumulative Impacts section. The evaluation of future demand appearing in Tables 4.14-10 through 4.14-14 only considers approved, but yet constructed projects. In short, the Cumulative Impacts section for water supply is essentially omitted. Given the importance of water supplies in Santa Barbara County and the South Coast area in particular, a robust analysis of cumulative impacts is needed to understand the LRDP’s potential effect in combination with other foreseeable projects. In particular, the RDEIR should consider the impacts of long range planning efforts in the County of Santa Barbara, the City of Santa Barbara, and the City of Goleta in terms of cumulative impacts of population growth and development.
LRDP Impact W-2 claims that the increase in demand for water resulting from the 2008 LRDP “may necessitate the pumping of additional groundwater from the Goleta Groundwater Basin.” This impact is listed as less than significant, and no mitigation measures are required. The impact, however, of resuming groundwater pumping from the Goleta Groundwater Basin may in fact have significant and unavoidable environmental impacts. There is no analysis of the impacts that might result from resuming pumping of the basin. Furthermore, the Goleta Water District currently uses the Goleta Groundwater Basin as a storage facility to bank excess water from the Cachuma and State Water Projects. If pumping resumes, the Goleta Water District’s reserves will be lowered, and this may have a significant impact in future critically dry and drought years.

LRDP Impact W-3 and its proposed mitigations do not adequately address nor secure potable water needed to accommodate the proposed growth. Stating that the increase in population under the 2008 LRDP “may increase demand” is not logical. The significant increase in students, faculty and staff will clearly increase the demand for water. The proposed mitigations do not demonstrate the availability of supplemental supplies. In addition, the proposed mitigation of conservation/retrofitting does not provide a schedule or estimate of water savings. Thus the statements regarding adequacy of supply for the LRDP are without basis. The proposed Residual Significance level is inadequate.

LRDP Mitigation W-3B proposes to individually meter all new UCSB living units or buildings and charge each unit based on water use. This efficacy of this measure is questionable in large dormitory-style facilities where common bathrooms and kitchens are used by numerous students, making individual charges infeasible. This mitigation will only be effective in “apartment-style” units and faculty/staff homes.

LRDP Mitigation W-3C proposes the installation of water saving devices in all new buildings and in all existing buildings. Without a pre-determined timeline for installation in existing buildings, this mitigation measure will also have limited effectiveness.

LRDP Mitigation W-3D and 3E are both vague and unenforceable. These measures will have limited, if any, effect on mitigating Impact W-2.

LRDP Mitigation W-3F is unenforceable as written. By saying that the University “shall work to identify and acquire additional water supplies beyond those currently available to GWD” mitigation measures which provide a level of certainty to address impacts are ignored. Without a solid requirement for the University to actually acquire enough water for the LRDP’s needs (not just to “work to identify and acquire water”), the impact ignores reasonable and feasible mitigation measures.

Alternative Mitigation Measure that is Adequate and Feasible

The proposed mitigations need to ensure that potable water for the proposed growth is secured. The mitigations should disclose the needed water entitlements to accommodate the 2008 LRDP growth. If at any point, demand for water attributable to the University has the potential for exceeding supply, then a reasonable and feasible mitigation measure would be to phase enrollment, faculty/staff growth and facility construction with the capacity of available water supplies. Significant impacts to water supply impacts, regardless of whether they are temporary, are avoidable.
4.15 Wastewater

WW Comment #1  General Comment

The County of Santa Barbara concurs with the input and comments of local sanitary districts, as this utility is served by Goleta Sanitary District (GSD) and Goleta West Sanitary District (GWSD).

WW Comment #2   4.15.2.3 2008 LRDP Impacts and Mitigation Measures

LRDP Impact WW-1: If the LRDP is approved as planned, the wastewater flows from the University will exceed the University’s portion of the wastewater facility’s capacity, the University’s capacity under the GSD’s NPDES permit and the GSD’s NPDES permit capacity. The only mitigation measures suggested by the RDEIR involve the University “requesting” that the GSD and the GWSD apply for new NPDES permits and for the University to “negotiate” the acquisition of additional design capacity in the GSD wastewater treatment plant. These mitigation measures are unenforceable and will do little, if anything, to reduce the significant impact if the NPDES permit is denied or additional capacity is not granted. Mitigation measures to reduce wastewater generation of existing and proposed facilities are not analyzed.

Alternative Mitigation Measure that is Adequate and Feasible:

The University should have to ensure that it owns an adequate portion of the GSD wastewater treatment facility’s capacity before the LRDP is allowed to progress. This may involve the University having to make a financial contribution to the expansion of the wastewater treatment plant. The University should contribute to the cost of the GSD and the GWSD’s applications for modification or re-issuance of their NPDES permits.
Endnotes and References

1 Affordability is based on the assumption that a worker could afford a rental payment equal to 33% of this/her gross monthly income.
2 RDEIR, page 4.10-36, provides this data regarding indirect population and job growth.
3 The EIR indicates that 2,214 new jobs will be created as a result of the implementation of the LRDP. The vast majority of the new off campus jobs to service the direct UCSB population growth of 11,071 will be in the retail, hospitality, and service sector industries. We know that there are 1.2 jobs per household which means that 1,845 new households will be created. The average household size in the south coast is 2.6 persons. From that we can calculate that 4,797 new indirect people, given the projections would come to the south coast as indirect result of job growth to service the direct LRDP population growth.
4 Currently Transportation DIF estimated at $57,008,800 + $33,150,300.
Attachment B:
Santa Barbara County Comments on the
Recirculated Draft Environmental Impact Report (RDEIR)
Volume No. 2 – January 2009
2008 UC Santa Barbara Long Range Development Plan (LRDP)
State Clearing House Number: 2007051128

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Preface


Attachment A:

The County of Santa Barbara submitted comments on the Draft Environmental Impact Report (DEIR) for the 2008 Long Range Development Plan to UCSB on June 23, 2008. Please see these original comments in Attachment A of this comment letter for the County’s original remarks on the following sections of the DEIR:

1.0 Introduction
2.0 Summary of Environmental Impacts and Mitigation Measures
3.0 Project Description
4.0 Environmental Setting
4.1 Aesthetics
4.3 Biology
4.4 Cultural Resources
4.5 Geology, Soils and Geotechnical
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4.8 Land Use and Planning
4.9 Noise
4.11 Public Services
4.12 Recreation
4.16 Other Utilities
5.0 Alternatives
6.0 Other CEQA Considerations

Attachment B:

As Attachment B, the County has prepared comments pertaining to the Recirculated DEIR (RDEIR) sections as follows:

1.0 Introduction
4.2 Air Quality
4.10 Population and Housing
4.13 Transportation
4.14 Water Supply
4.15 Wastewater

Attachment C:

As Attachment C, the County has resubmitted Fiscal Impacts of University of California, Santa Barbara’s Long-Range Development Plan, prepared for the County by Economic Planning Systems in June 2008. Please refer to this document for all references to the fiscal impacts of the 2009 LRDP. Specifically, any references to Attachment B in the County’s original comment letter (Attachment A of this packet) should be redirected to Attachment C in this submission.

Attachment D:

As Attachment D, the County has submitted comments specifically addressing the Ocean Road Housing Project component of the proposed 2008 LRDP.
1.0 Introduction and Summary

Intro Comment #1. General Comment

Except as otherwise noted below, all of the County’s previous comments on the original 2008 LRDP DEIR remain unchanged and have continued relevance. Please see Attachment A for these comments. Furthermore, it is noted that the not all subparagraphs of the recirculated Sections are included in the RDEIR. For instance, in Section 4.13 Transportation and Circulation, paragraph 4.13.1.2 is missing in the RDEIR. It is unclear whether missing paragraphs default back to the DEIR or whether their exclusion is intentional and are not longer relevant. This confusion complicates the review and brings into question the adequacy of documentation and may require recirculation pursuant to Public Resources Code §15088.5 (a) (4). To ensure that all of its comments are considered, the County expressly uses the terms “document, “EIR,” “DEIR” and “RDEIR” interchangeably throughout.

Intro Comment #2. 1-1 Background

The Ocean Road Housing Project is a component of the LRDP and is included in the assessment of environmental impacts in the RDEIR. Since the publication of the DEIR, details on the Ocean Road Housing Project have been released in the form of an Initial Study that was presented for public review by the University in November 2008. The County understands that the University has rightly withdrawn the bifurcation and analysis of the project ahead of the review and certification of the 2008 LRDP and corresponding DEIR.

The Ocean Road Housing Project is a physical manifestation of the LRDP and provides project-level insight into the environmental effects of the LRDP as a programmatic document. Information on the project was disseminated in the form of a draft Initial Study and presented by the University at scoping hearing conducted in November 2008. The wealth of information furnished by the University, along with the public’s comments on the Initial Study, raise concerns on a number of environmental issues including aesthetics, land use and planning, population and housing, and transportation and circulation. The DEIR, on the other hand, dismisses such issues with statements such as:

- “The proposed Ocean Road housing development will enhance the interface between the community and the University, as well as increase the permeability for pedestrians and bicycles.” (page 4.8-20);
- “The Ocean Road project is intended to strengthen the transition between the Main Campus and the community of Isla Vista.” (page 4.8-25); and
- “The residential uses would be compatible with the existing residential uses west of Ocean Road” (page 4.8-26).

These statements are conclusionary in nature, unsupported by facts in the record, and contradict comments made by members of the public at the Initial Study scoping meeting last November. The RDEIR must acknowledge the new information resulting from the Ocean Road Housing Project as well as the public comments on the Initial Study. Included as Attachment D is the County’s comment letter on the Ocean Road Project Initial Study; these comments are relevant to the LRDP and must be addressed as part of the RDEIR. Furthermore, the interplay of the Ocean Road Housing Project with the LRDP and their associated impacts clearly require major revision and re-circulation of entire DEIR, not only selected elements.
Intro Comment #3.  1.3 Public Review Process

The RDEIR assures the reader that all prior comments on the DEIR will receive responses in addition to those submitted on the RDEIR. For that purpose, Attachments A, C, and D to the County’s transmittal letter reiterates the comments it previously furnished in connection with the proposed 2008 LRDP and related environmental analysis.

Intro Comment #4.  1.4 Summary of Impacts and Mitigation Measures

Please note there are two elements of the text labeled as Section 1.4. In specific regard to the Summary of Impacts and Mitigation Measures, the table beginning on page 1.0-4 should be updated to incorporate the various comments made by the County in the paragraphs that follow.

Intro Comment #5.  1.4 Summary of Impacts and Mitigation Measures

The County is aware of at least one mitigation measure identified in the EIR for the 1990 LRDP that has not been executed by the University. The measure entails the relocation of the main UCSB entrance from El Colegio Road to Mesa Road. This was proposed and listed as the mitigation for traffic impacts to El Colegio Road and Isla Vista intersections as well as air quality. The consequence is a large unmitigated residual traffic impact. A second potential violation is the fact that current UC enrollment may exceed the 1990 cap of 20,000 students by approximately 1,100 persons. As a result, the conclusions in the REIR are based on faulty assumptions and thus are not supported by substantial evidence. The RDEIR must explain how pre-existing unmitigated impacts will be resolved; else, conclusions on effects attributable to the 2008 LRDP are without foundation. Given the mutual agreement and understanding on enrollment and mitigations, please provide details on how mitigation under the 2008 LRDP will be implemented, what assurances will be provided and how will oversight be monitored. Please also explain how pre-existing unmitigated impacts will be resolved.
4.2 Air Quality

AQ Comment #1 General Comment

Among other variables, air quality is a function of vehicle trip generation and traffic management. More vehicles translate to more emissions; congested intersections and peak hour trip additions increase idling time and resulting air quality degradation. For the reasons more fully discussed in Section 4.13 (Transportation and Circulation) the RDEIR understates vehicular impacts attributable to UCSB growth; both direct and indirect. As noted under Population and Housing herein (POP Comment 18: 4.10.2.3. LRDP Impact POP-4), indirect impacts attributable to the 2008 LDRP total 12,105 persons. Air quality impacts attributable to this impact must be addressed in addition to the 11,106 persons directly attributable to UC growth. As a consequence, air quality modeling is compromised and the conclusions in the REIR are based on faulty assumptions and thus are not supported by substantial evidence. Insofar as the air quality and transportation/circulation sections are interdependent, corresponding deficiencies must be corrected and resulting effects must be evaluated.

AQ Comment #2 1.4 Summary of Impacts and Mitigation Measures

The DEIR indicates that UCOP policy on Sustainable Practices requires LEED certified equivalent and encourages Silver Ratings for all new construction. However, the policy is not codified in any mitigation measure and the UC Regents could modify or change the policy should it be determined to be economically feasible to do so. The practices as outlined and referenced in relation to the UCOP practices in the Air Quality section need to be binding and it is reasonable and feasible to include the practice in an enforceable mitigation measure that requires the University to meet quantifiable benchmarks for GHG reduction.

Reasonable and feasible mitigation measures should be integrated into the EIR as provided by the Office of Planning and Research in their June 19, 2008 publication: CEQA AND CLIMATE CHANGE: Addressing Climate Change through California Environmental Quality Act (CEQA) Review. The Technical Advisory Document explains how impacts and mitigation measures from climate change and “greenhouse gas” (GHG) emissions should be addressed in environmental impact reports prepared for residential, commercial and industrial development and other projects under CEQA. The document augments existing California climate change legislation aimed at enforcing GHG reductions (AB 32), and requiring consideration of GHG issues in environmental analysis documents for a broad spectrum of projects (SB 97).

The Advisory document begins by providing a background on the science of climate change and how it arises in the CEQA context. CEQA does not prescribe thresholds of significance for any given environmental impact; instead, the statute encourages public agencies to adopt their own thresholds. This determination presents a particular challenge in the framework of a climate change analysis, where science continues to evolve and effects are measured on a global scale. As a result, OPR has asked the Air Resources Board (ARB) technical staff to recommend a method for setting thresholds that will encourage a consistent approach statewide. In the meantime, this Advisory provides informal guidance for lead agencies attempting to make and mitigate a GHG threshold of significance determination.

The Advisory recommends a three-step approach to CEQA analysis of GHG emissions:

1) Mandatory Quantification of GHG Project Emissions:

The environmental impact analysis must include quantitative estimates of CO2 and GHG emissions from different types of air emission sources within the broad range of residential, commercial, industrial and other types of projects. These estimates should include both construction-phase emissions, as well as completed
operational emissions, using one of a variety of available modeling tools. This analysis may be located in one or more typical sections of the EIR, including air quality, transportation, energy, or a separate section on climate change.

2) **Continued Uncertainty Regarding “Significance” of Project-Specific GHG Emissions:**

Each agency preparing the environmental impact report is obligated to assess the significance of the project’s impacts on climate change (even in the absence of any thresholds of significance set by an air quality agency. OPR’s guidance also makes clear that the environmental analysis must describe a “baseline” of existing (pre-project) environmental conditions, and then add project GHG emissions onto this baseline to evaluate whether impacts are significant. This “baseline” directive is a clear rejection of arguments that GHG emissions are driven more by population than particular project.

3) **Menu of Mitigation Measures:**

OPR also identifies a menu of GHG emission mitigation measures, ranging from balanced “mixed use” master-planned project designs to construction equipment and material selection criteria and practices. Legally, mitigation may only be required for “significant” impacts. However, the ongoing technical and corresponding legal uncertainty regarding when GHG emissions are “significant” for a particular project has, as a practical matter, resulted in many projects adopting GHG mitigation measures to minimize GHG emissions and strive for “carbon neutrality.” OPR raised the legal bar on this practice by including a pointed reminder that “all feasible” mitigation measures or project alternatives must be adopted if an impact is significant, defining feasibility in relation to scientific, technical and economic factors. If mitigation measures cannot sufficiently reduce project impacts, the agency should adopt whatever measures are feasible and issue a detailed, fact-based Statement of Overriding Concerns explaining why additional mitigation is not feasible.

The EIR fails to provide any specific mitigation measures that commit the University to implement LEED standards. Reasonable and feasible mitigation measures offered in OPR’s June 2008 technical advisory, such as funding alternative transportation, etc. are ignored and are not analyzed, rendering the RDEIR’s analysis incomplete and inadequate.

**AQ Comment #3  4.2.1.3 Air Quality Standards and Existing Air Quality**

The data in Table 4.2-1 should be based upon the most recent data available from the Santa Barbara County Air Pollution Control District. The Santa Barbara Attainment/Nonattainment Classification Summary for 2008 designates Santa Barbara County as non-attainment for the California 8-hour Ozone standard and as non-attainment for the California PM10 standard. The 2008 Summary also registers the County as “Unclassifiable” for attainment of the California PM2.5 standard and as “Unclassifiable/Attainment” for the federal PM2.5 standard. This information is available at [http://www.sbcapcd.org/sbc/attainment.htm](http://www.sbcapcd.org/sbc/attainment.htm).

**AQ Comment #4  4.2.2.3 2008 LRDP Impacts and Mitigation Measures**

Impact AIR-3 should disclose that Santa Barbara County is a non-attainment zone for the California PM10 standard. The increase in NOx and PM10 emissions from construction activities under the 2008 LRDP will only further exacerbate the County’s air pollution problems and will keep the County from reaching attainment status. This impact is significant and unavoidable. Reasonable and feasible mitigation measures are available to the University to reduce the impact and are provided under the transportation section of the County’s comments.
4.10 Population and Housing

Pop Comment #1. General Comment

The 2008 LRDP proposes a substantial amount of growth in its student, faculty, staff populations, and related academic/support space. As proposed, the student population increase is more than double was agreed upon for the 1990 LRDP (5,000 and 2,000, respectively). The 2008 LRDP proposes to accommodate this substantial population growth with proposed development as the University student population grows to 25,000 students from 20,000, which was the population cap established in the 1990 LRDP. However, the EIR indicates that the student population has already exceeded the student growth proposed in the 1990 LRDP, by 1,410 students (see POP Comment #2). Therefore, the conclusions in the EIR are based on faulty assumptions and thus are not supported by substantial evidence. The impacts of this preexisting growth, coupled with the proposed growth toward buildout of the 2008 LRDP must be more thoroughly addressed in this section of the DEIR through analysis and disclosure to clearly identify potential impacts on and off campus.

Pop Comment #2. 4.10.1.1 Study Area

Based on Table A.1 of the 2008 LRDP, the Total Existing Population of UCSB is 24,685. However, the EIR and the UC Santa Barbara Office of Budget and Planning discloses a much higher existing population as of the 2007-08 school year. Section 3.0: Project Description and the UC Santa Barbara 2007-08 Campus Profile discloses that in the 2007-08 school year, UCSB had:

- 9,723 Faculty and Staff (UCSB Personnel headcount, UC Santa Barbara, “2007-08 Campus Profile”, page 8, http://bap.ucsb.edu/IR/07-08/cp2007.pdf)
- Total Population = 31,133

This discrepancy is a difference of 6,448 people factoring in the existing UCSB population, not including student, staff, and faculty family members.

Similarly, Table A.1 of the 2008 LRDP reports that in 2025 the UCSB population will be 31,431 people. However, in Section 4.11: Public Services, the EIR discloses that LRDP will actually bring 11,106 additional people due to:

- 5,443 new bedspaces
- 239 net new student family units (@ 2.68 persons per unit)
- 1,874 net new faculty/staff units (@ 2.68 persons per unit)

This means that the true total primary population by 2025 from the 2008 LRDP is 42,239. The difference between these two sums is 10,808 people. Additionally, Section 4.10: Population and Housing (Table 4.10-3) reports that the unincorporated area of Isla Vista houses 40% to 46% of UCSB’s student population. At this rate, in 2025 12,463 of the 27,092 projected student population of UCSB will reside in Isla Vista. The discrepancy between what is reported in the Table A.1 and what is disclosed in the DEIR should be remedied. If this discrepancy is not remedied, the EIR will remain without accurate supporting information upon which to base conclusions on population growth and related housing demand. Furthermore, the EIR should perform all analyses of environmental impacts based on the higher potential buildout population, as this would disclose all impacts under a “worst-case scenario” development pattern.
Pop Comment #3. 4.10.1.1 Study Area

Most if not all table references in the RDEIR are incorrect. Specifically, the narrative references to tables do not match the enumeration of tables. Thus, the narrative is incomprehensible.

Pop Comment #4. 4.10.1.1 Study Area

The data provided for student and faculty populations should be consistent with the method of measurement from the 1990 LRDP. Data should also specifically illuminate how UCSB has or has not complied with the 1990 LRDP. For example, the 1990 LRDP population cap is 20,000 students; however, as implied on page 4.10-2, UCSB has already exceeded this cap by 1,082 students, given the headcount for the 2006-2007 academic year.

In addition, all tables in the EIR should reference the most recently available data regarding student, faculty, and staff headcount and FTE at UCSB. As discussed in POP Comment #2, the most recent data is available in the 2007-2008 Campus profile, not the 2006-2007 academic year as used on page 4.10-2.

Pop Comment #5. 4.10.1.2 Residence Patterns of UC-Affiliated Populations

The RDEIR indicates that 360,000 persons are forecast to visit the University each year by 2030. This translates to 955 persons/day compared to only 280 persons/day in the original DEIR. Please explain how this difference figures into traffic modeling and what mitigation measures are identified to address these impacts.

Pop Comment #6. 4.10.1.2 Residence Patterns of UC-Affiliated Populations

It should be noted that the Santa Catalina Residence Hall is located in the community of Isla Vista, and is only accessible through roadways maintained by the County. In addition, it should be noted that Santa Catalina Residence Hall housed UCSB students prior to UCSB's acquisition of the property. This means that the 7% increase in the number of students living on UCSB-owned property, as referenced, does not reflect a net shift in students from the Isla Vista community to the UCSB campus.

Pop Comment #7. 4.10.1.2 Residence Patterns of UC-Affiliated Populations

The data provided in Table 4.10-8 should provide a nominal figure as well as a percentage for each of the represented categories. This would enable a full comparison between 1990 residential patterns and more recent residential patterns for faculty and staff.

Pop Comment #8. 4.10.1.2 Residence Patterns of UC-Affiliated Populations

Table 4.10-10 should be revised to clarify whether the “unincorporated Santa Barbara” category references the entire unincorporated South Coast, or just the communities of Isla Vista and Hope Ranch, as referenced in Table 4.10-18. If so, a note should explain that this includes the communities of Summerland, Montecito, Isla Vista, and the Eastern Goleta Valley, and consistent labeling of the unincorporated South Coast should be used throughout the document.

Pop Comment #9. 4.10.1.3 Housing

Updated (i.e., 2008) data should be used for vacancy rates, household size, and median housing prices. Data from 2006 is inadequate, particularly as it relates to vacancy rates and housing prices. New data may be accessed through numerous sources including the California Economic Forecast and the UCSB Economic Outlook.
Pop Comment #10. 4.10.1.3 Housing

Table 4.10-18 can be construed as misleading and is not very useful. The table and narrative imply that the rate of population growth should be lower than the rate of housing growth to result in a healthy housing market. In fact, the rate of household growth and formation, not population growth, is the more accurate statistic to use in comparison to housing growth. The rate of household growth and formation statistic accounts for changes in household size that are not accommodated for in the population growth statistic. For example, a low overall rate of population growth could still result in a high demand for housing, if coupled with a rapidly shrinking household size, as is the case in communities with a large population of retired households.

Pop Comment #11. 4.10.1.6 Regulatory Context

Regional Housing Needs Assessment (RHNA): Table 4.10-19 and both of the tables labeled 4.10-20 should be updated to reference the data in the adopted 2007-2014 Regional Housing Needs Allocation. The narrative associated with these tables should be updated as well to reference that the 2005-2040 Regional Growth Forecast and the 2007-2014 Regional Housing Needs Allocation, both of which do not anticipate the level of growth identified in the LRDP. SBCAG produced both documents prior to circulation of the Draft LRDP. However, since UCSB is in the unincorporated area, the County credits UCSB housing projects against the County’s RHNA target. This information should also be considered in the RDEIR.

Pop Comment #12. 4.10.1.6 Regulatory Context

County of Santa Barbara: The County’s Local Coastal Plan housing policies should be disclosed.

Pop Comment #13. 4.10.2.2 Analytical Method

Please clarify the distinction between Assignable Square Feet versus Gross Square Feet, as well as the ramifications in assessing impacts. The current ratio of building space for Instruction, Research, and Support Space is 154 square feet per person (i.e., 3.8 Million GSF/24,685 University Population; Table 4.10-21). Under the proposed LRDP, an increase of 2.5 Million GSF is forecast compared to a total University population increase of 6,436 students, faculty, and staff, resulting in a building to population ratio of 388 square/feet per person. This ratio is clearly not reasonable given the growth in on-campus population compared to past development patterns. Furthermore, non-resident users (i.e., visitor professors, non-profit and for profit researchers, etc.) render the assumptions inaccurate. Therefore, the EIR conclusions regarding the impacts of increased population on housing demand are not supported by evidence. Among other deficiencies, the RDEIR must articulate measures that will be taken to ensure that building uses do not change over time in ways that would compromise the environmental review process and resultant mitigation.

Pop Comment #14. 4.10.2.3. 2008 LRDP Impacts and Mitigation Measures

The EIR does not quantify the impacts of redevelopment of various existing housing developments on campus, such as Storke and Santa Ynez apartments. This type of redevelopment will likely displace substantial numbers of existing housing and people during construction. The number of people that would be displaced should be quantified and the impacts should be determined and mitigated to the extent feasible.

Alternative Mitigation Measure that is Adequate and Feasible

The 2008 LRDP and EIR should propose a phasing plan for all development. The phasing plan should address the following at issuance of Notice of Impending Development (NOID):

1) Existing student populations
2) Additional students at each phase  
3) Number and types of existing housing units  
4) Number and types of additional housing units  
5) The location and capacity of housing for displaced residents during redevelopment projects  

The issuance of any NOID should not result in the displacement of residents into surrounding areas off campus. If so, this secondary impact must be evaluated and mitigated as well. Furthermore, if at any point, on-campus housing cannot accommodate the proposed growth (student and faculty) then a reasonable and feasible mitigation measure would be to stage enrollment, faculty/staff growth and facility construction with the capacity of new housing to accommodate the added population. The proposed four-year lag in the DEIR is not acceptable as the surrounding areas will be burdened with the anticipated growth during this period. This impact, whether temporary or not, is avoidable.

**Pop Comment #15. 4.10.2.3. 2008 LRDP Impacts and Mitigation Measures**

**LRDP Impact POP-1:** No evidence is provided to support the conclusion that a vacancy rate of 9% (the difference between the enrollment growth of 5,000 students and the 5,443 planned bed spaces) is adequate to accommodate housing choices by new students and avoid direct population growth in the Isla Vista community. Housing adequacy is also a function of affordability; again, the RDEIR provides no quantitative analysis to substantiate its conclusionary statements. Since no analysis of the vacancy rate needed to facilitate appropriate housing choices is provided, it is erroneous to conclude a less than significant level of impact. Among other reasonable and feasible mitigation measures to assure that enrollment, faculty and staff growth and facility construction does not impact off-campus housing is to restrict residency in the new on-campus housing to the newly added population.

**Alternative Mitigation Measure that is Adequate and Feasible**

Analyze vacancy rates of other university campus housing projects to determine the level of vacancy needed to facilitate appropriate housing choices, and avoid spill-over into neighboring communities. Please provide measurable mitigation measures to address spillover to minimize impacts to housing.

**Pop Comment #16. 4.10.2.3. 2008 LRDP Impacts and Mitigation Measures**

**LRDP Impact POP-2:** The analysis of this impact is inadequate because it states that mitigations to address induced growth through roadway improvements are consistent with County goals expressed in the Isla Vista Master Plan and the County General Plan. Neither of these County documents contemplates the development or growth proposed in the 2008 LRDP, thus no clear conclusion can be made to support the designation of a “less than significant” impact based on an alignment with the goals expressed in the Isla Vista Master Plan or the County General Plan.

Furthermore, the new on-campus housing that will be constructed under the 2008 LRDP will not alleviate the housing needs of the population in Santa Barbara County who are not UCSB students, faculty or staff. The increased number of students, faculty and staff under the 2008 LRDP will cause businesses to grow in Santa Barbara County, and those businesses will attract people to move to the County to work in the County. This indirect growth cannot be classified as less than significant without a proper analysis.

**Alternative Mitigation Measure that is Adequate and Feasible**

The EIR should demonstrate how direct and indirect growth caused by the 2008 LRDP may impact the goals expressed in the Isla Vista Master Plan and the County General Plan, and then determine the level of significance and provide mitigations consistent with those proposed in the County’s June 2008 comments on the DEIR.
Pop Comment #17. 4.10.2.3. 2008 LRDP Impacts and Mitigation Measures

LRDP Mitigation Measure POP-3(A) is inadequate as it states that housing opportunities may not keep pace with increases in either enrollment and/or new employees anticipated under the 2008 LRDP. This is identified as a significant impact, and LRDP Mitigation POP-3A proposes to defer mitigation of the impact to a later date and through later studies. As proposed, by reviewing later permit trends, UCSB will try to assure that adequate housing will be provided for new populations. It is unclear when this housing would be provided, since pages 4.10-30 – 4.10-33 indicate that studies and subsequent actions would be performed annually, but that actions would be considered every four years. In addition, it is unclear what performance measures will be used to determine whether accelerated planning for new housing is required. It is stated on page 4.10-31 that UCSB may make a “finding” in any given year as to whether “sufficient” progress is being made to provide new housing opportunities. However, no reference or context is provided as to what constitutes “sufficient” progress. Such future findings that are not tied to specific performance standards act to postpone the required impact analysis. Such deferral of impact analysis is clearly prohibited by CEQA and also renders the mitigation measures inadequate since they are not based on appropriate and transparent existing evidence.

No analysis has been provided to illustrate the sufficiency of the menu of actions UCSB may take to house un-accommodated populations. For example, it is impractical to conclude that off-campus apartment complexes could be leased by UCSB without discussing existing apartment availability, vacancy rates, rents, and whether this action would displace existing populations. Likewise, no data has been provided to illustrate that convertible space in lounges and bedrooms is adequate to address a potential housing shortfall. A discussion on the spare feet of space available in existing facilities would suffice. Furthermore, increasing the per-room occupancy of the existing on-campus housing needs to be further analyzed for consistency with fire codes and density limitations. Finally, the conclusion that the payment of in-lieu fees for replacement housing is infeasible is unsubstantiated, since no data has been presented to analyze past housing production enabled through the in lieu fee programs managed by the County or other jurisdictions (see narrative on page 4.10-33).

The comment made on 4.10-32 that Study area communities could see temporary increases in demand for housing is in direct conflict with the designation of a less than significant impact provided for POP-1. This is especially the case, given the low rate of vacancy in Isla Vista. Any time lag between LRDP residential development and the growth in student, faculty, and staff populations presents significant impacts to the surrounding areas that could be mitigated with an accurate development phasing plan that developed housing prior to increases in enrollment. Absent such a plan, population increases will lead to an acceleration of urban blight, impacts on parking and transportation, and a decrease in the availability and sufficiency of public services, among other foreseeable issues.

To provide data and context regarding impact to surrounding communities, over any given four-year period in the LRDP, housing for an average of 1,176 students and 450 faculty/staff (annualized growth over four years) is needed. These increases in population will have an impact on the demand for additional housing and services in the unincorporated area of Santa Barbara County by significant levels. Moreover, these impacts have not been adequately quantified, as the unincorporated areas of Goleta and Isla Vista are not disaggregated from the City of Goleta in most discussions. According to the DEIR Table 4.10-3, 40-46% of UCSB students live in Isla Vista (This is inconsistent with Table B.11 in the Draft LRDP which says that 40% of students live in Isla Vista). This means an additional 470 to 540 students and 20-25 faculty/staff may locate in Isla Vista over this four-year period. In fact, this additional population represents a new increment of growth that will not be entirely accommodated until the final LRDP housing projects are constructed, which could be twenty years into the future. This new increment does not account for any increases to the base population of students (70% off-campus) that is likely to occur due to a portion of undergraduate students that may need more than four years to graduate.
This new increment of growth will increase the demand for housing, parking, public safety, and other public services throughout the life of the LRDP. According to the Parking Study referenced in the RDEIR, 83% of students living in Isla Vista own vehicles. Most faculty and staff can be assumed to own vehicles. This indicates that the demand for and additional 400 – 450 parking spaces will likely have an impact on Isla Vista parking and circulation conditions, which are severely constrained currently. Additionally, this new increment of growth will place pressure on existing non-student residents’ ability to afford the cost of housing, as lower vacancy rates and heightened demand for housing will drive rents above the current rate of $1,000 - $1,400 per bedroom for student housing in Isla Vista.

This negatively impacts the ability of the County to achieve the Isla Vista Master Plan’s (IVMP) Housing Goal to produce new housing that is affordable to all sectors of Isla Vista, including area workers and families who are unaffiliated with UCSB. IVMP Housing Policies 2, 4, and 5 are negatively impacted by this unaddressed increment of growth, as overcrowding will expedite dilapidation of the housing stock and large student populations could crowd out long-term residents. This new increment of growth also negatively impacts the County’s’ Housing Element Policy 1.10.4, under which Isla Vista constitutes an important community for meeting the unincorporated area’s regional housing needs.

**Alternative Mitigation Measure that is Adequate and Feasible**

The most effective way to mitigate these impacts is to ensure that new housing accommodates growth in student enrollment and faculty/staff is provided prior to the actual presence of these populations. Currently, the mitigation is unclear and calls for ensuring that accommodations are provided within annual or four-year periods. The following should be incorporated into LRDP Mitigation POP-3A to ensure that the impact remains less than significant:

- To ensure that sufficient housing accommodations are planned appropriately, the County requires that the LRDP and the EIR include a phasing plan and development schedule that shows when residential projects will be phased, and demonstrates how this phasing correlates with anticipated UCSB workforce and student growth.

- To ensure that sufficient housing accommodations have been provided, the County requires that all NOIDs demonstrate affordability and suitability of the proposed space. Notices should include all items illuminated in the LRDP, as well as housing types and tenures, proposed rents or sale prices of units, targeted population served by the units, the number of units in a project, and the jurisdiction within which the project is located to ensure that units will be affordable to UCSB workforce and students, and will not induce growth in Isla Vista.

- UCSB is required to provide an annual report summarizing all NOIDs, along with the other information relevant to the new development, to the County and all other jurisdictions by February 1 of each year, so that this information may be included in the Housing Element section of each appropriate jurisdiction’s General Plan Annual Report to the Legislature.

- The findings supporting whether sufficient housing capacity has been demonstrated will be based on the information provided in the NOIDs and UCSB’s annual report. If a finding has been made by the UCSB Planning Director that sufficient housing capacity has been demonstrated, this finding must be supported by the County Board of Supervisors. Otherwise, UCSB will contribute to the Isla Vista Affordable Housing Trust Fund and the Isla Vista Parking Fund.

- The items noted above should be incorporated into the 2008 LRDP Notice of Impending Development (NOID) language and associated DEIR mitigations.
Pop Comment #18.  4.10.2.4. Cumulative Impacts and Mitigation Measures

LRDP Impact POP-4: The LRDP will create direct and indirect growth that will add to the demand for housing in the County. This will have significant impacts that are capable of being mitigated. As the RDEIR notes, the annual average rate of growth in population exceeds the rate of growth in housing throughout the County. This fact places pressure on vacancy rates, increases rents and housing costs, and increases competition for affordable housing, particularly for very low and low income households. The proposed LRDP will worsen this situation in several ways.

As noted in POP-4, the LRDP will drive employment growth in other industries through the induced effects of workforce and student spending, as well as capital spending. At least 2,214 new jobs will be created as a result of the implementation of the LRDP (estimated based on new total of 11,071 induced jobs in Section 6.21). The vast majority of these jobs will be in the retail, hospitality, and service sectors, which are some of the lowest paying industries in the County. Based on salary information from the 2006 UCSB Economic Outlook, salaries for the hospitality and retail industries averaged $23,000 per worker, and salaries in the services industry averaged $42,000 per worker. Retail and hospitality workers could afford to pay $680 per month for housing, whereas service industry workers could afford to pay $1,180 per month. Clearly, workers that occupy these jobs will place increased demand on the County’s stock of rental housing. Those who are unable to find housing will be forced to commute from outside of the area, thereby impacting the roadway system and contributing to traffic congestion, air quality and greenhouse gas emissions.

Additionally, a large portion of the UC workforce is likely to remain on the South Coast through retirement, adding to the demand for housing that is created by existing and new members of the UC workforce. Even though newly hired staff would be provided with housing through the projects in the 2008 LRDP, as much as 72% of the current University workforce is expected to retire, and a large portion of these retirees are likely to remain on the South Coast. For those retiring members of the UCSB workforce that are currently housed on-campus, their re-entry into the private market place represents an additional increase in demand for housing.

In sum total, indirect growth inducing impacts from job creation and UC retirement are estimated to total 12,105 persons per the computation below:

<table>
<thead>
<tr>
<th>Indirect Job Creation:</th>
<th>2,214 Jobs</th>
</tr>
</thead>
<tbody>
<tr>
<td>No. of Jobs Per Household:</td>
<td>1.2 Jobs</td>
</tr>
<tr>
<td>No. of Job Creation Households:</td>
<td>1,845 Hslds (2,214 Jobs/1.2 Jobs)</td>
</tr>
<tr>
<td>No. of UC Retirees:</td>
<td>3,373 Persons (4,685 * 72%)</td>
</tr>
<tr>
<td>No. of UC Retire Households:</td>
<td>2,811 Hslds (3,373 Persons/1.2 Jobs)</td>
</tr>
<tr>
<td>Total No. of Indirect Households:</td>
<td>4,656 Hslds (1,845 Job Hslds + 2,811 Retirement Hslds)</td>
</tr>
<tr>
<td>Total No. of Indirect Persons:</td>
<td>12,105 Persons (4,656 Hslds x 2.6 Persons)</td>
</tr>
</tbody>
</table>

Alternative Mitigation Measure that is Adequate and Feasible

LRDP Mitigation POP-4A should be modified to ensure that the resulting impact is mitigated to a less than significant level. The modification below should accomplish this.

- House 100% of the current and future UC workforce and student population on the UCSB campus, so as to relieve direct and indirect induced pressure on the County’s housing stock. This will reduce demand for housing and enable the new workers that occupy jobs induced by UCSB, along with UCSB retirees, to find housing within the existing housing stock.
• Provide housing for more UCSB students. Currently only first-year undergraduate students are guaranteed on-campus housing. If UCSB were to extend this guarantee to even just first and second-year students, the impacts on the surrounding housing stock would be lessened.
4.13 Transportation

Trans Comment #1 General Comment

The 2008 LRDP proposes a substantial amount of growth for its student population, faculty, staff and academic space. Implementation of the proposed UC Santa Barbara LRDP would degrade County of Santa Barbara intersection and roadway operations near the campus to unacceptable levels. Comments provided below address the traffic impact analysis and adequacy of proposed mitigation measures identified in the Draft EIR. Furthermore, the DEIR should disclose the assumption made in the baseline impacts as part of this DEIR for the pending development of North Campus.

This section also needs to differentiate impacts, mitigations, monitoring and supporting discussion between affected jurisdictions. Currently, the identified impacts use and contain different jurisdictions within the RDEIR proposed mitigations and supporting discussion. This inaccurate description of existing conditions is confusing and results in mitigation measures that are not supported by clear data or other supporting evidence. Further, the mitigation measures themselves, even if they were based on accurate and reasonable data are ineffective. Also, the DEIR should identify all reasonable and feasible measures to ensure implementation of improvements that would mitigate the large impacts that the project will cause. Under the 1990 LRDP, the relocation of the main UCSB entrance from El Colegio Road to Mesa Road was proposed as mitigation to traffic and air quality impacts. This mitigation was never implemented and, as such, residual traffic impacts persist. The 2008 LRDP DEIR does not describe the clear cumulative impacts that are caused by the residual traffic problems and the foreseeable impacts caused by the project. The DEIR should detail how mitigation will reduce these significant cumulative transportation impacts, how these measures will be implemented and measures to ensure their full execution.

As noted under Population and Housing herein (POP Comment 18: 4.10.2.3. LRDP Impact POP-4), indirect impacts attributable to the 2008 LDRP total 12,105 persons. Indirect impacts attributable to the University must be addressed in addition to the 11,106 persons directly attributable to UC growth. As a consequence, traffic modeling is compromised and the conclusions in the REIR are based on faulty assumptions and thus are not supported by substantial evidence. Insofar as the air quality and transportation/circulation sections are interdependent, corresponding deficiencies must be corrected and resulting effects must be evaluated.

Finally, a number of the mitigation measures, such as “LRDP Mitigation TRAFFIC-4A,” do not ensure effectiveness through a quantitative analysis. Such analysis is required for the EIR to be deemed adequate.

Trans Comment #2 4.13.1.1 Roadway System

Please use the proper names of the Caltrans facilities mentioned in the DEIR and RDEIR: SR 217 and US 101. Please revise both documents to be consistent in this usage throughout.

Trans Comment #3 4.13.1.1 Roadway System

The DEIR and RDEIR should be clear that the Community of Isla Vista is in the unincorporated portion of the County of Santa Barbara and is subject to the County Comprehensive Plan, the Coastal Land Use Plan, the Goleta Community Plan, and the Isla Vista Master Plan.
Trans Comment #4  4.13.1.1 Roadway System

The County initially commented that the DEIR omits discussions of Isla Vista roadway operational issues such as level of service and safety impacts associated with bicycle traffic and pedestrian traffic. Of particular significance, the intersection level of service (LOS) at Embarcadero Del Norte and Pardall Road is greatly influenced by east-west bicycle pedestrian traffic. The County stated how the DEIR must provide a level of service analysis, discuss and analyze sensitivity to increases in pedestrian and bicycle volumes, and discuss and analyze impacts caused by creating several vehicular access points to the main UCSB campus from Isla Vista roadways.

The RDEIR attempted to address this by stating that there is no national standard for intersection analysis with a mix of bicycles, pedestrians and cars. However, the bicycle volume is not considered in the intersections other than showing signal warrant criteria based on bicycle and pedestrian volumes. The Institute of Transportation Engineers’ (ITE) “Manual of Transportation Engineering Studies” shows that there are several methods that could be used including delay studies, queue studies, etc. These types of studies should be used to help the reader and decision maker form an understanding of how the intersections are performing. The absence of any national standard specifically does not excuse UCSB of preparing the required analysis to determine the expected impacts related to high volumes of pedestrians and bicycles to intersections.

Trans Comment #5  4.13.1. Roadway Systems

Traffic Volumes: Although traffic counts were added to Appendix 4.13-1 to augment the recirculated section analysis, the County is concerned that the counts were taken in May 2006 for internal campus roadways and intersections, and in February 2007 for City of Goleta and for freeway facilities. No new counts were done. Also, the counts do not show pedestrian or bicycle volumes. A reason is presented on Page 4.13-4 for why new counts were conducted more than 2 years ago. However, considering that a sufficient EIR requires traffic counts to be conducted within one year time frame, the result should be updated to ensure a valid traffic count for an EIR traffic study.

Trans Comment #6  4.13.1. Roadway Systems

Traffic Volumes: The document identifies eleven (11) study intersections analyzed in the am peak. All intersections that were analyzed in the pm peak should also be analyzed in the am peak for project specific impacts as well as fair share contributions to cumulative impacts.

Trans Comment #7  4.13.1 Study Intersections

The document should rely on the Isla Vista Master Plan and the Goleta Community Plan for study intersections in Isla Vista.

Trans Comment #8  4.13.1.1 Study Intersections

US 101/SR 217 and US 101/Fairview Avenue interchanges should be added/noted as primary interchanges serving the UCSB campus in the 4th paragraph on page 4.13-1.

Trans Comment #9  4.13.1 Traffic Volumes

On Page 4.13.4, the first paragraph mentions that several additional facilities were analyzed in the RDEIR. These additional facilities should be listed.
Trans Comment #10 4.13.1 Traffic Volumes

To determine roadway and intersection performance the document performs an analysis during the pm Peak Hour, only performs a partial analysis of the am Peak Hour. The document reports that this decision was based on analysis of roadway volumes on Storke Road and Ocean Road. Ocean Road is within the UCSB campus and has no relevance to the regional roadway network. Storke Road may have little significance related to the regional roadway network depending on where the data was taken, which is not disclosed. If the data was collected near the intersection of El Colegio Road, then primarily UCSB related traffic would be captured. The document needs a thorough am Peak Hour analysis because regional impacts to roadways that are not just in UCSB or immediately adjacent to UCSB need to be analyzed.

Trans Comment #11 4.13.1 Traffic Volumes

The volume to capacity (V/C) calculations in Table 4.13.8 and Table 4.13-41 are incorrect for City and County roadway segments. The analysis incorrectly uses the LOS C threshold volume instead of the roadway design capacity volume to calculate volume to capacity. These tables should be revised with the correct V/C information.

Trans Comment #12 4.13.1 Bicycle and Pedestrian Facilities

The document proposes to designate at least five east-west routes from Isla Vista to the Main Campus (Page 4.13-25 and Figure 4.13-4A and B) for bicycle/pedestrian uses. This may impede the flow of traffic in Isla Vista, as bicycle users typically do not obey traffic controls. By spreading the east-west bicycle routes throughout the area, it would be very hard for northbound and southbound motorists to cross both protected and unprotected intersections. Instead, UCSB should designate less impeding bicycle routes using Pardall Road/Sueno Road and design them as Bicycle Boulevards (bikes, pedestrians, and other non-automobile modes of transportation only).

Trans Comment #13 4.13.1 Bicycle and Pedestrian Facilities

Bicycle and Pedestrian Facilities: Under past LRDPs, UCSB has implemented an effective and comprehensive circulation system for bicyclists and pedestrians, as shown in Figure 4.13-4A and B. However, it is unclear if this existing system will be maintained under buildout of the LRDP. Readers of the DEIR would benefit from the maps shown as figures 4.13-4a and 4.13-4b being modified to show both existing and proposed bicycle routes. Proposed building footprints should be displayed on these maps to indicate where the existing system would be eliminated and how the new proposed system would link with existing system elements. This would aid in the full disclosure of known impacts and ability of identified mitigations to lessen these impacts.

Trans Comment #14 4.13.1 Bicycle and Pedestrian Facilities

The proposed diversion of bicycle traffic from Pardall Road to parallel routes would result in causing two additional intersections (El Greco and Cordoba Road) to warrant a bicycle signal. The impacts are identified but no mitigation is proposed. Impact fees or intersection enhancements should be included as necessary and new mitigation measures should be added.

Trans Comment #15 4.13.1.4 Parking

The document omits an analysis of the impacts associated with the non-resident vehicles parking as close as possible to UCSB occupying available space closer to the main campus. The document also omits a discussion of how any increase in Isla Vista non-resident parking impacts spread to the west. The methodology presented in the document suggests that a percentage of any increase in student population...
will mean an increase in non-resident Isla Vista Parking. The document does not provide this data and an associated analysis of potential impacts.

The document implies that the County could mitigate these impacts for UCSB by implementing a community parking permit program. UCSB is responsible for mitigating the impacts of the proposed LRDP and the document should discuss past failed attempts to implement a parking permit program due to opposition from many groups including the State of California Coastal Commission, which indicates that a parking permit program in Isla Vista implemented by the County is not feasible. UCSB shall be responsible for the implementation and management of any on-campus parking permit program since UCSB is responsible for mitigating impacts of their development plans.

Additionally, a free or subsidized campus parking permit program that encourages faculty, staff and students to utilize UCSB-provided parking through cost-savings may be viable to reduce the need for free parking in Isla Vista and surrounding neighborhoods. So long as the University charges for on-campus parking, Isla Vista will be the natural choice of UCSB users insofar as off-campus parking is free. A reasonable and feasible mitigation measure would be to equalize the cost of parking on and off-campus as well as the construction of additional on-campus parking to accommodate overall demand. In this regard, all on-campus parking could be made free of charge by the University and a user charge could be added to enrollment fees to recoup the cost of maintenance.

**Trans Comment #16 4.13.1.4 Parking**

The RDEIR does not address the percent utilization, turn-over, and inventory of parking in Isla Vista. The document does not specifically address, quantify or mitigate how the added faculty, students, and staff parking in Isla Vista will exacerbate the existing conditions and deficiencies largely caused by UCSB related parking on the streets of Isla Vista. The document provides no discussion regarding UCSB related parking typically filling in all available spaces near the University and the impacts this has to resident and business parking.

**Trans Comment #17 4.13.1.4 Parking**

Isla Vista students are not allowed to purchase parking permits for the proposed parking structures because they live too close to campus to qualify. However, given the identified underutilization of campus parking spaces and proposed new parking spaces, a parking pass for long-term car parking should be made available to resident students residing in Isla Vista. Since many students store their cars in Isla Vista while they access campus for academic and commercial purposes, the option of on-campus long-term parking for UCSB students who live in Isla Vista may help mitigate the impacts of UC students parking in the community.

**Trans Comment #18 4.13.1.4 Parking**

According to the parking survey contained in the document, 25.4% of the available parking (approximately 3,480 total spaces) in the neighboring community of Isla Vista is used on a daily basis. Another 11.4% of the available parking spaces in Isla Vista is frequently occupied by UCSB campus residents and faculty/staff. An additional 12% of parking spaces is occupied occasionally and 22.4% of spaces is used approximately once per month. If the seldom and occasional users decide to park on days that the daily and frequent drivers occupy the community’s parking spaces, 71.2% of all the available parking in the community would be occupied by UCSB residents and faculty/staff. The usage of available parking in Isla Vista currently may range from 25.4% to 71.2% on any given day. This is unquestionably a current and significant impact on the Isla Vista community. This significant impact to the community reduces available parking for residents, businesses, and coastal visitors.
The proposed parking program does not address the current impacts from current UC Santa Barbara development nor mitigate for future impacts. Since there are constraints on available parking space on campus to serve the current population, it can be assumed that approximately the same percentages of new campus residents and faculty/staff would choose to park in the neighboring community. The community does not currently have the available parking capacity to handle demand created by existing and proposed UC development. Further, offering main campus parking for a fee will not fully mitigate impacts to coastal access since the majority of coastal access parking will be located in Isla Vista where there is not a fee for parking. So long as the University charges for on-campus parking, Isla Vista will be the natural choice of UCSB users insofar as off-campus parking is free. A reasonable and feasible mitigation measure would be to equalize the cost of parking on and off-campus as well as the construction of additional on-campus parking to accommodate overall demand. In this regard, all on-campus parking could be made free of charge by the University and a user charge could be added to enrollment fees to recoup the cost of maintenance.

Since the Coastal Commission has denied the County’s parking permit program for Isla Vista and parking is therefore to remain free for the foreseeable future, the LRDP must address its impacts to the community through mitigation fees and/or provision of parking in or near the community. The analysis does not include discussion of the multiple vehicle households that will likely be added with proposed faculty/staff and graduate student housing. Consideration should be given to the parking demands of families that will occupy new faculty, staff and graduate student housing and the commensurate increased parking demands in Isla Vista.

Trans Comment #19 4.13.1.4 Parking

The RDEIR should include a discussion of the economic climate that may lead to increased pressure on people to park off-campus rather than pay the cost of permit for the campus parking spaces. As noted above, reasonable and feasible mitigation measures include the elimination of on-campus parking fees and/or banning off-campus parking for registered students, faculty and staff. Both alternatives would be the University’s responsibility to implement.

Trans Comment #20 4.13.1.4 Parking

The DEIR/RDEIR references a study indicating that as much as 28% of students and an additional 1% of resident faculty/staff residing on the Main Campus use Isla Vista for parking despite the availability of on-campus parking. It may be assumed that a similar percentage of new resident students, faculty and staff will choose to park in Isla Vista rather than pay for UC campus parking. This is a significant impact to an area that is already significantly impacted by current UC development.

As previously noted, the document asserts that 25.4% of the available parking spaces in Isla Vista is used by UC Santa Barbara campus residents, faculty and staff on a daily basis. Another 11.4% of the available parking spaces is frequently occupied by UCSB campus residents and faculty/staff. An additional 12% of parking spaces are occupied occasionally and 22.4% of spaces is used approximately once per month. If the seldom and occasional users decide to park on days that the daily and frequent drivers park in the community, 71.2% of all the available parking in the community would be occupied by UCSB residents and faculty/staff. The proposed 2008 LRDP, in combination with existing baseline conditions attributable to UCSB, will create considerable cumulative impacts. There is a current significant impact to the community that will be further impacted by the proposed development.

The discussion in this section includes a suggestion that the County implement a parking permit and enforcement program for Isla Vista but also notes that a previous County parking permit proposal was not approved by the Coastal Commission. The RDEIR concludes that this impact is therefore unavoidable. The conclusion is not supported by the facts. As noted above, reasonable and feasible mitigation measures include transportation demand strategies which have effective and document impacts on automobile
dependent transportation, such as subsidized mass transit, etc. The absence of reasonable and specific mitigation measures that would measurably reduce automobile dependency render ambiguous mitigation shifting measures to cooperate on developing a Isla Vista parking program as simply inadequate.

Trans Comment #21 4.13.1.4 Parking

Of the 3,650 parking spaces proposed to be added to the current stock, the University is planning to only provide on additional 100 parking spaces for commuter use on Main Campus. The limited parking spaces provided for the Main Campus are not proportional for the magnitude of proposed development. The amount of parking increase provided should bear some relationship to the programmatic increases and physical development planned in the LRDP to appropriately mitigate parking impacts to Isla Vista.

Specific parking impacts to the Isla Vista Community are not addressed in RDEIR. A significant amount of the campus daily use and residential parking demand is currently occurring on public roadways in the Isla Vista area. Programmatic enrollment and staffing increases, without associated parking or transportation provisions, will increase demand for parking in Isla Vista as well as resultant traffic increases associated with the search for available parking. A comprehensive parking demand, supply, & management study for the Isla Vista Community should be provided to identify adequate mitigation to the impact of additional parking demand on the neighboring communities.

Trans Comment #22 4.13.1.4 Parking

The parking study did not examine the am (7-9) and pm (4-6) peak hours similar to the traffic study in Isla Vista. This approach would show the correlation between the am. and pm. peak travel times and to be consistent with the Isla Vista parking analysis. Without this analysis, the RDEIR fails to adequately assess the impacts of peak traffic conditions on parking availability.

Trans Comment #23 4.13.1.4 Parking

Parking histogram: Page 4.13-32: This chart should be expanded to include the am and pm peak hours to be consistent with the analysis period of interest and to be consistent with the Isla Vista parking study, which did include the roadway peak hours of operation. Without this analysis, the RDEIR fails to adequately assess the impacts of peak traffic conditions on parking availability.

Trans Comment #24 4.13.1.4 Isla Vista Parking

Table 4.13-18: This table provides the reader with survey information and statistical data. The table should be expanded to provide the reader with a margin of error in the interest of full disclose consistent with CEQA.

Trans Comment #25 4.13.1.4 Isla Vista Parking

Table 4.13-18: The total responses for Non-UCSB/Non-Isla Vista Housing do not track with “Have a car while at UCSB” as they do in the previous columns. It also seems odd that all of the total responses for this column also do not have an on-campus permit. Additionally, the “total surveyed” does not appear to be a summation of the data in the columns. These omissions result in unreliable data which can not be adequately assessed for impacts to the regional transportation and parking network.

Trans Comment #26 4.13.1.4 Isla Vista Parking

Table 4.13-19: This table provides statistical data that is not clearly presented. The table should make it clear that an average weighted utilization rate based on the number of school days per month was used. For reference, County staff calculates this rate to be approximately 32%. The paragraph following table
4.13-19 provides data that calculates to a rate of 25% (885/3480) and page 4.13-40 claims a utilization rate of 40%. The data in this section should be reevaluated for consistency and a standard methodology should be applied to the survey results that does not ignore the user groups that park in Isla Vista on a less than often basis.

Trans Comment #27 4.13.1.4 Goleta Beach Parking

Table 4.13-20: This table provides statistical data that is not clearly presented. The table should provide an average weighted utilization rate that is based on the number of school days per month. The data in this section should be reevaluated for consistency and a standard methodology should be applied to the survey results that does not ignore the user groups that park at Goleta Beach on a less than often basis. Percentages were calculated based on total surveyed, not total responses. For people who did not respond, it is not known where they parked. Percentages should therefore be taken based on the total responded. Therefore, Table 4.13-20, which reflects the total population, is also incorrect.

The University should pursue reasonable and feasible mitigation measures for impacts to coastal beach access at Goleta Beach, including but not limited to the funding of parking enforcement staff to ensure that UCSB commuters do not occupy parking spaces designated for coastal recreation.

Trans Comment #28 4.13.1.4 Parking

Proposed LRDP Parking: The LRDP states that since “new students and faculty/staff would reside in University owned housing under the LRDP, additional parking on the main campus for commuters would be minimal”. Unless there are restrictions placed on the new students, such as prohibiting cars for students living on-campus, it should be assumed, and documented numerically, that there will be an increase in parking demand in Isla Vista and surrounding communities. The University should consider a new policy restricting cars for new enrollment and/or the development of permitted remote lots for undergraduate student long-term and daily parking to deter parking in adjacent parking spaces in Isla Vista and Goleta Beach.

Trans Comment #29 4.13.1.4 Parking

The DEIR and 2008 LRDP propose to increase the available parking from 1 space for every 4.6 students to 1 space for every 4 students. However, Tables 4.13-12 and 4.13-13 indicate an average parking utilization rate between 66% and 80%. Given that 60% of UCSB students have personal vehicles, it is reasonable to assume that the proposed population growth and academic space increases will require additional parking spaces beyond the proposed 3,650 under the 2008 LRDP.

Trans Comment #30 4.13.1.5 Campus Travel Characteristics

Mitigation in the DEIR places significant value on the UCSB TAP program to help mitigate impacts associated with buildout of the LRDP. To assess the effectiveness of this mitigation, figures regarding existing TAP utilization under current campus characteristics need to be provided. If mitigation relies on the success of expanding program elements to mitigate for LRDP traffic impacts, then information needs to be provided to assess how the existing program is performing.

Trans Comment #31 4.13.1.5 Campus Travel Characteristics

Table 4.13-25: This table is based, in part, on the results of a 2002 survey. The results of this survey are outdated and are not applicable due to their age. The students who answered this survey in 2002 have graduated. Current student, staff and faculty responses are necessary for the proper analysis. The DEIR should be revised to reflect a current survey, no more than two years old.
Trans Comment #32 4.13.1.6 Local Goals & Policies

In addition to the Isla Vista Master Plan, this section should include references to the County of Santa Barbara Goleta Community Plan Transportation Policies and the Goleta Transportation Improvement Plan (GTIP) policies and implementation strategies.

Trans Comment #33 4.13.1.6 Local Goals & Policies

While never completed under the 1990 LRDP, the designated improvements of Mesa Road that were agreed upon in the 1990 LRDP Mitigation Implementation Agreement should be completed. This would help mitigate impacts to the relatively few regional east-west roadways. Mesa Road can then become a local access road to the Main Campus. LRDP Policy TRANS-8 should be amended to state “Mesa Road shall be widened...” as this is a critical transportation corridor. In addition, consistent with mitigation proposed by the County in Section 4.3 Biology, any widening of Mesa Road should not encroach into designated Environmentally Sensitive Habitat Areas (ESHA).

Trans Comment #34 4.13.2.2 Analytical Method

Throughout the document, potential new roadway connections between Isla Vista and the main campus are referenced, discussed and considered as potential mitigation. However, roadway connections are not part of the 2008 LRDP and the County has no intention to plan, construct, or maintain these roadway connections. The RDEIR states: “The roadway connections between Isla Vista and the Main Campus are not proposed as part of the 2008 LRDP” (Page 4.13-76). Therefore, the discussions and road connection references should be removed from the DEIR document and not considered as potential mitigation to traffic and circulation impacts.

Trans Comment #35 4.13.2.2 Analytical Method

Figure 4.13-7: Although the Proposed Roadway Improvement and Additional Study Intersection Map have been updated in the RDEIR, this figure could show existing and proposed lane geometrics at each intersection under the LRDP. This would indicate what will happen at each intersection in a graphical format that should be easier to understand. Alternately, an additional map would allow more detail to explain the improvements on a finer scale.

Trans Comment #36 4.13.2.2 Analytical Method

The analytical method discussion in LRDP section 4.13.2.2, states that the Isla Vista Master Plan has not been submitted to the Coastal Commission. However, the plan was submitted to the Coastal Commission on November 20, 2007 and is currently in the review process. This analysis is not sufficient to draw the conclusions that are made in the RDEIR.

Trans Comment #37 4.13.2.2 Analytical Method

The analysis includes 41 intersections for the pm peak hour, but it only analyzed 11 intersections for the am peak hour. The document should analyze all 41 intersections for both am and pm peak hour conditions. Although some of the area roadways and intersections show more total traffic during the pm peak hour, the am traffic volumes indicated at the selected locations show much stronger directional movements and higher one-way traffic flows especially toward the campus in the am peak hour. Critical traffic conditions near college campuses are more likely to be found during the am peak hour, since the majority of students take classes that begin during am peak period, while relatively few classes end during the pm peak period. It is more likely that traffic impacts would be found during the am peak hour, especially for intersections within or near the campus. Thus, the analysis to be conducted for am peak hour is very important to determine the impact of the project.
In addition, to identify potential project impacts or cumulative impacts, the study area should have included the following areas:

- Roadway segments and major intersections along Cathedral Oak Road,
- (Additional) roadway segments and major intersections within the Isla Vista Community
- Roadway segments and major intersections within County of Santa Barbara unincorporated areas, northeast of the campus

In general, the LRDP traffic study area should be determined based on the CMP criteria and study guidelines for UCSB, City of Goleta, Isla Vista Community, County of Santa Barbara, and Caltrans. The recirculated study added five (5) arterial intersections, ten (10) ramp junctions, and one (1) street segment for the analysis. However, no additional am peak hour analysis and no intersections along Cathedral Oak Road and within Isla Vista Community have been added. This omission renders the analysis inadequate in determining the impacts of the 2008 LRDP on the local transportation network.

Trans Comment #38 4.13.2.2 Analytical Method

Table 4.13-33 indicates that the LRDP will generate a total of 27,276 daily trips with 1,604 am peak hour trips and 2,170 pm peak hour trips. The adequacy of the trip rate (for instance, the trip rate from students’ apartments) should be presented. Table 4.13-28 of the DEIR proposes 25% internalization (reduction) of trips within the Main Campus. However, the 25% trip reduction of the daily and am and pm peak hour volumes cannot be replicated based on the assumption. In addition, Table 4.13-31 fails to provide detailed information on how the trips for the 25% internalization of trips between Storke & West Campus Housing & Main Campus have been calculated. It is likely that such internalized trips will leave one side of the campus and use streets in the Isla Vista Community to travel to the other side of the campus. The EIR may thus underestimate traffic impacts on streets in Isla Vista and on El Colegio Road by reducing the traffic generation forecast based upon internalized trips both within Main Campus and between Main Campus and remote campuses.

The trip generation and internalization assumptions are the factors which ultimately generate the “fair share” calculations related to impacts to intersections and roadway segments. The University’s fair share calculation if applied to County cost estimates to transportation facilities come to a total of approximately $1.9 million dollars. The University’s flawed fair share calculation ignores community standards related to Levels of Service and the County’s projection that these facilities would operate at or above accepted levels of service without added 2008 LRDP trips. The cost of maintaining Levels of Service at intersections and along roadway segments as a result of LRDP impacts must be wholly borne by UCSB. The County estimates the transportation improvements needed for the multi-modal approach to accommodating LRDP growth to be approximately $90 million dollars.

Trans Comment #39 4.13.2.2 Analytical Method

Project trip distributions are not provided in the RDEIR. A traffic study and traffic impact section of an EIR must indicate roadways that are expected to experience traffic increases and the numerical traffic volumes associated with the project on each roadway. The project trip distribution should be based upon an objective source or reliable origin/destination study. For this study the traffic model should provide a select zone analysis indicating the distribution of project trips and the resultant traffic volumes in the am and pm peak hours. The study documents provided do not allow for the identification of the volume of traffic increase associated with each roadway, because the volumes are not documented and the traffic model can unintentionally mask project traffic increases during the traffic assignment process, thus underestimating the traffic volumes and potential impacts.
Trans Comment #40 4.13.2.2 Analytical Method

The report mentioned bicycle and pedestrian issues on and off campus. It also suggests designating five new east-west connections between Isla Vista and the Main Campus (Page 4.13-24) for bicycle/pedestrian uses. The plan also proposes to discourage use of Pardall Road, which is the main bicycle route connecting the Isla Vista Community to the main campus, passing through an underpass into the campus aligned with the main east/west bicycle corridor within the campus.

The plan to deemphasize Pardall Road is not advisable. Bicycle users often do not obey stop signs and other static traffic controls. By spreading the bicycles on other roadways throughout the area, it will become more difficult for northbound and southbound motorists to travel through intersections with more frequent east/west bicyclists. The LRDP should continue to encourage bicycles to use Pardall Road/Sueno Road, and these roads should be further enhanced as Bicycle Boulevards to provide the most appropriate method of circulation for bicyclists. The Isla Vista Community Master Plan should be further referenced in order to properly plan for and participate in the improvement projects for Isla Vista. The task of managing the extremely high bicycle traffic volumes between Isla Vista and the campus will be greatly complicated by deemphasis of the Pardall bike route and the proposed elimination of the grade separation of Pardall Road at Ocean Road.

In addition, the intersection analysis did not consider the impact of bicycle movements at several locations where their inclusion would seriously affect the results. For instance, the intersection of Pardall Road at Embarcadero Del Norte is shown as LOS B during the existing pm peak hour. This is because all east/west bicyclists were excluded from the traffic count used for the analysis. If bicycle volumes were counted and properly considered, we believe that the intersection would be evaluated at LOS F under existing conditions based on field review of traffic flows and delays to the stopped street movements. We estimate that up to 20,000 bicycle trips per day are being made along Pardall Road on a typical school day. LRDP growth and the modal assumptions made in the traffic analysis and the lack of modeling intersection friction by bicycles does not accurately determine the levels of significance, and therefore do not properly provide reasonable and feasible mitigation measures.

Trans Comment #41 4.13.2.2 Analytical Method

With regard to forecasted turning movement volumes for all scenarios illustrated on Figure 4.13-8 through 4.13-11, the methodology for explaining why the southbound left turn volumes for intersection #15 are decreased by 110 vehicles from “2025 No Project” to “2025 With LRDP Conditions” should be disclosed. Also, an explanation is needed as to why the westbound volumes for intersection #34 are decreased from the existing condition to 2025 No Project conditions. This type of reduction should not occur given the assumptions of the LRDP’s traffic model. Many forecasted turning movement volumes for all scenarios illustrated on Figure 4.13-8 through 4.13-11 do not appear reasonable. Specifically, the volumes for intersection # 37, #38, and #40 show negative volumes from existing to 2025 No Project conditions, which implies traffic conditions will improve. The DEIR should disclose the assumptions and reasons for this type of discrepancy.

Trans Comment #42 4.13.2.2 Analytical Method

Table 4.13-29: UCSB Housing Summary: The table should be revised to include the net difference between each scenario (i.e., existing to cumulative, cumulative to cumulative plus LRDP).

Trans Comment #43 4.13.2.2 Analytical Method

The intersection and roadway analysis in the RDEIR for the roadway geometric conditions did not assume the completion of the County of Santa Barbara’s and the City of Goleta's roadway improvements under the GTIP. The completed improvements should be considered as baseline conditions; future improvements...
should not be considered as either baseline conditions or as mitigations for the impacts of the 2008 LRDP. The planned and completed improvements of the GTIP are intended to service populations under build out assumptions exclusive of the 2008 LRDP. New trips and associated traffic impacts must be assessed independently from the planned improvements of local jurisdictions.

Trans Comment #44 4.13.2.2 Analytical Method

The RDEIR identifies substandard levels of service at the regional intersections under 2025 no project conditions. This is not true since both the City and the County have approved infrastructure improvement programs and are currently collecting fees for improvements to retain acceptable LOS at these intersections and roadways. This table misrepresents the LRDP impacts to the surrounding infrastructure since it does not take in to account the baseline improvements approved in the Goleta Transportation Improvement Plan (GTIP). This table should be revised to reflect implementation of the approved GTIP improvements as a baseline for the projects proposed at the 2025 transportation scenario.

Trans Comment #45 4.13.2.2 Analytical Method

The RDEIR reports Mesa Road/Los Carneros Road is stated to operate at LOS E under 2025 conditions. The County GTIP identifies this intersection to operate at LOS C or better with the implementation of the GTIP improvement. The RDEIR should be revised to reflect a revised LOS under 2025 assuming completion of the Mesa Road/Los Carneros Road GTIP project.

Trans Comment #46 4.13.2.2 Analytical Method

In reviewing the calculation worksheets, a few intersections may be calculated incorrectly. For example, the intersection of Fairview Street at 101 Northbound Ramp shows incorrect geometry conditions. The Intersection of Camino del Sur at El Colegio has stop control placed along El Colegio instead of Camino Del Sur for the analysis. Errors in calculations of level of service can result in failure to properly identify deficiencies and impacts, and, therefore, the environmental impacts analysis is inadequate.

Trans Comment #47 4.13.2.2 Analytical Method

The RDEIR should list mitigation measures for each intersection based on the traffic patterns disclosed, and should illustrate the improvements on a geometry improvement figure. As it is, the scope and extent of improvements required may be underestimated. For example, if two turn lanes are required as a mitigation measure, the receiving roadway must have two lanes. This may result in the need to provide additional lanes on roadway segments continuously from one intersection to another.

Trans Comment #48 4.13.2.2 Analytical Method

Although the RDEIR includes a preliminary list of needed improvements to mitigate the impacts of the 2008 LRDP, the projected cost and feasibility of these improvements is not disclosed or analyzed. The RDEIR proposes to pay the County of Santa Barbara a “fair-share” of the cost to mitigate the impacts to transportation within the jurisdiction. In order to calculate a fair-share, the total cost of needed improvements should be disclosed. Furthermore, the proposed fair-share calculation should be based on the am and pm peak hour project volume contributions. The RDEIR propose a fair-share payment methodology and no cost estimates have been provided. As noted throughout these comments, the University’s flawed analytical approach and fair share calculation grossly underestimate the intersections and roadway segments that require improvements to maintain approved Level of Service.
Trans Comment #49 4.13.2.2 Analytical Method

The RDEIR should discuss and analyze anomalies in the existing traffic counts provided through verification of the raw traffic counts. If the raw counts have been adjusted for the analysis, please provide the location and methodology of the adjustment. Specify the assumptions of the ICU methodology for signalized intersection analysis methodology, e.g., the saturation flow and lost time assumptions.

Trans Comment #50 4.13.2.2 Analytical Method

A detailed Trip Generation and Distribution Study should be included in the technical appendices.

Trans Comment #51 4.13.2.2 Analytical Method

Student Housing trip generation estimate of 2.16 average daily trips (ADT) per student appears to be underestimated considering observed patterns in Isla Vista. For instance, Santa Catalina housing residents have a history of driving to classes on campus or parking close to campus in Isla Vista to avoid walking, riding a bike, or taking the bus. The RDEIR should assess the reported estimate of ADT for remote campus housing uniquely from the average trip rate and compare against rates observed from other residence halls and published national standards.

Trans Comment #52 4.13.2.2 Analytical Method

Tables included in the document do not reflect the phase-specific trip generation based on the project description. A new table should be added that shows projected trips associated with each proposed phase of development of the 2008 LRDP.

Trans Comment #53 4.13.2.2 Analytical Method

The document fails to provide project-specific trip distribution figures. In addition, no project-specific traffic volume figures have been provided either. Of particular concern is the Ocean Rd Housing/Mixed Use Project which has potential for significant auto, bicycle, and pedestrian traffic impacts in Isla Vista. This project should be considered in this RDEIR due to its high level of known detail in the project description as part of the first phases of implementation. Please provide these project-specific data based on a detailed 2008 LRDP phasing plan.

Trans Comment #54 4.13.2.2 Analytical Method

While the City of Goleta’s calibrated traffic model has been used in the analysis and mitigation of transportation impacts, there is no clear discussion of the assumptions or methodology applied in the model. Judging by the large scale and nature of the proposed development, it is reasonable that many assumptions were needed to complete the model and the traffic analysis. Without disclosure of the assumptions and methodology applied, the findings in the RDEIR and the technical appendices are unsubstantiated and, therefore, the RDEIR is inadequate. All assumptions in the methodology should be released in a traffic modeling report for the DEIR and clearly disclosed in Section 4.13. Specifically, the City model does not take into account pedestrians or bicycles in the trip generation. The intrazonal trips in the City model are therefore vehicle trips, from West or Storke campus to the Main campus or vice versa. With the LRDP model being refined to have more TAZs, the trips that were accounted for as intrazonal trips in the City model should be accounted for as internal (TAZ to TAZ) trips in the LRDP model. Also, no volume figures are provided and no model is provided for the new Housing Lag scenario in the appendix.
Trans Comment #55 4.13.2.2 Analytical Method

The RDEIR reports that the City of Goleta traffic model forecasts p.m. peak hour volumes under Year 2030. However, the source for the peak hour trip generation rates is not disclosed or justified in the RDEIR for the land use categories of Student Family Housing Units and Faculty Housing Units. Additionally, the RDEIR does not describe or justify modifications to the trip generation rates specifically for the 2008 LRDP project description. There is no further discussion of how the a.m. forecasts have been generated. Please provide detailed modeling data for am forecasts. These trip generation rate details should be disclosed and explained in the RDEIR. Without these details, the findings and mitigations proposed by the DEIR are unfounded and inadequate.

Trans Comment #56 4.13.2.2 Analytical Method

The RDEIR refers to Appendix 4.13-1 for land use and roadway improvements. No land use data or roadway improvement information was provided in Appendix 4.13.1. Please provide detailed land use assumptions for review.

Trans Comment #57 4.13.2.2 Analytical Method

The RDEIR sentence states that several land use categories were omitted due to negligible changes under different scenarios. In the interest of full disclosure, this information should be disclosed in a tabular format consistent with the requirements of CEQA.

Trans Comment #58 4.13.2.2 Analytical Method

The RDEIR acknowledges that funding for the majority of the roadway improvements is uncertain (i.e., full funding has not yet been identified) and that traffic forecasts and LOS results were developed assuming only the existing roadway network was present. This approach is not acceptable considering the County and the City of Goleta have identified and approved improvements for the planning area and are currently collecting AB1600 fees to construct. The LRDP analysis must assume these improvements as part of the baseline conditions to be consistent with County and City of Goleta Community Plans. The assumption that the infrastructure will never be built is completely unfounded and minimizes the impacts of the LRDP to the surrounding infrastructure, as infrastructure that is already compromised is slated for improvements. The County and City of Goleta have adopted plans and improvements that will maintain LOS C conditions within Goleta planning area under build out conditions. As mentioned in prior comments, the improvements planned by the City of Goleta and the County of Santa Barbara should not be applied as mitigation to the impacts of the 2008 LRDP project.

Trans Comment #59 4.13.2.2 Analytical Method

The RDEIR and transportation analysis should be revised to consider the implementation of the approved GTIP improvements on the region’s transportation network.

Trans Comment #60 4.13.2.2 Analytical Method

This section, and the associated analysis, should be revised to reflect the impacts of the 2008 LRDP on transportation with and without the widening of Hwy 101 to 6 lanes. Though the 6-lane project is identified in the SBCAG 2004 MTP, it is unapproved and unfunded. Therefore, the UCSB may not associate this project as part of baseline conditions when impacts to traffic are assessed.
Trans Comment #61 4.13.2.2 Analytical Method

Vehicle Miles Traveled (VMT) Comparison: The RDEIR provides an analysis of potential increases in VMTs resulting from implementation of the 2008 LRDP as related to commute distances and housing trends, but it fails to identify linkages with AB32, SB375, and other air pollution policy, planning, a regional goals. Specifically, this section should explain the linkages and provide analysis of air quality impacts related to VMTs in the Section 4.2: Air Quality of the DEIR.

Trans Comment #62 4.13.2.2 Analytical Method

The list of proposed LRDP roadway improvements is internally inconsistent regarding how proposed improvements to El Colegio Rd. are treated. The RDEIR suggests El Colegio Rd. is assumed to be improved from County funding sources. As yet, no funding source for improvements to El Colegio west of Los Carneros has been finalized. UCSB impacts to this section of roadway/intersections, assuming existing conditions, should be determined.

Trans Comment #63 4.13.2.2 Analytical Method

The RDEIR indicates that the City of Goleta traffic model forecasts pm peak hour volumes for Year 2030. There is no further discussion with how the am peak hour forecasts have been generated. Detail modeling data and methodology for both am and pm peak hour forecasts should be provided. Although City of Goleta traffic model documentation is available, the land use data, the zone structure and the highway network have been updated/modified for the UCSB LRDP project. Information on the approach to and extent of modeling inputs should be furnished to insure that model updates have been properly made.

The City of Goleta Traffic model provides only peak hour traffic volumes on roadway links, while intersection turning movements are required to evaluate traffic level of service. The methodology for transforming link volumes into intersection turning movements should be identified and documented. Some methodologies may inappropriately reduce traffic volumes during the process of preparing turning movement forecasts. Also, the process of refining the peak hour link forecasts to address local inconsistencies and anomalies in the forecast should be indicated.

It is indicated that Year 2025 traffic forecasts were developed by addition of traffic growth between the base year and Year 2025 models to existing traffic counts for the study facilities. Please provide the detail post-processing worksheets for review. The methodology may not apply to future new intersections and/or locations which experience significant roadway circulation changes.

Trans Comment #64 4.13.2.2 Analytical Method

It is clear that the focus of this section of the RDEIR is an analysis of the relative changes in traffic associated with changes in campus development associated with the proposed LRDP. This is perhaps appropriate for identification of the incremental impacts of the changes proposed by the LRDP; however it does not consider the additional impacts of planned development permitted under the existing LRDP. The impacts of a development, per CEQA, should not be reduced by dividing the project into phases and analyzing the incremental development of each phase, especially when a large amount of development is identified by the current plan. Therefore, pending projects of the existing LRDP should be included in baseline conditions. At minimum, additional traffic resulting from the existing LRDP should be included in the assessment of cumulative impacts and the relative contribution of UCSB to cumulative traffic growth in the area.

Intersections in or near the campus are highly affected by this issue. The traffic analysis shows minor contributions to total traffic increases at locations such as Los Carneros Road at Phelps/Mesa Road, however virtually all traffic increase at this intersection would be attributed to UCSB campus growth.
Additionally, as noted under Population and Housing herein (POP Comment 18: 4.10.2.3. LRDP Impact POP-4), indirect impacts attributable to the 2008 LDRP total 12,105 persons. Indirect impacts attributable to the University must be addressed in addition to the 11,106 persons directly attributable to UC growth. As a consequence, traffic modeling is compromised and the conclusions in the REIR are based on faulty assumptions and thus are not supported by substantial evidence. Insofar as the air quality and transportation/circulation sections are interdependent, corresponding deficiencies must be corrected and resulting effects must be evaluated.

Trans Comment #65 4.13.2.2 Analytical Method

With regard to the calculation of UCSB’s proportional fair share of specific improvements in Table 4.13-52, the County has the following comments:

1) The list of improvements is exclusive of improvements the County believes are needed in other areas of the Goleta Valley to mitigate the impacts of the 2008 LRDP, specifically segments and intersections along Hollister Ave and Cathedral Oaks. Please see Table 1 of this comment letter section for the County’s assessment of impacts and related costs based on the adopted GTIP and additional mitigation.

2) The percentage “fair share” identified does not comport with what the County has assessed as the actual contribution of trips based on the information provided in this RDEIR. With an overall increase of 29,266 daily trips external to main campus and the fact that relatively little development is proposed by the County of Santa Barbara or the City of Goleta in these areas, it is reasonable to assume that any improvements required to the area’s roadway network to accommodate the 2008 LRDP develop will be caused primarily by these additional trips. Table 4.13-52 reports that the University is only responsible for at most 21.9% of the future traffic volume increases. The County is concerned that the traffic model for the 2008 LRDP is under-projecting the traffic volume increases and distribution without justification. Please see Table 1 of this comment letter section for the County’s assessment of impacts and related costs based on the adopted GTIP development impact fee structures and additional mitigation costs.

3) The RDEIR assumes that the percentage of future increased traffic volumes on area roadways attributable to the 2008 LRDP should determine the percentage of the cost to improve the roadway or intersection. This is not an appropriate approach to the mitigation. Since the County of Santa Barbara and the City of Goleta has adopted thresholds for acceptable levels of service, based on V/C ratios, the planned transportation improvements are intended to maintain acceptable service for the network based on long-range land use planning. The UCSB unplanned contribution to the transportation network will breach the adopted thresholds. Therefore, the cost of any additional improvements, other than those planned as part of the GTIP, are 100% attributable to UCSB for the contribution to local roadway network.

4) Of particular concern, intersections in or near the campus are highly affected by increased trips and delays. The traffic analysis shows minor contributions to total traffic increases at locations such as Los Carneros Road at Phelps/Mesa Road, however virtually all traffic increases at this intersection would be attributed to UCSB campus growth.

Trans Comment #66 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

The RDEIR should add City of Santa Barbara to the participating agencies due to the existence of the Airport and the regional nature of bus lines utilized by UCSB.

Trans Comment #67 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

LRDP Mitigation TRAFFIC-2A: The 2008 LRDP will have significant impacts to Santa Barbara County, specifically in Isla Vista, intersections and roadway operations due to increased demand from autos, bicycles and pedestrians. Increases in faculty, staff, and students, even those living on campus, result in
increased traffic in Isla Vista, particularly bicycle and pedestrian related trips. It is reasonably foreseeable that LRDP development will utilize the Isla Vista transportation network for a portion of their trips, particularly via El Colegio Rd. to transport UCSB populations between the many campuses of UCSB. However, impacts to the Isla Vista transportation network are not assessed in the RDEIR, and no mitigations are proposed. The RDEIR should be revised to propose improvements to County roadways in Isla Vista and the Goleta Valley to benefit future auto, bicycle and pedestrian trips as part of the 2008 LRDP.

**Alternative Mitigation Measure that is Adequate and Feasible**

In 2006 the County of Santa Barbara, Department of Public Works completed the Isla Vista Sidewalk Study. The purpose of this study was to identify strategies for improving sidewalks in Isla Vista between the UCSB Main Campus western boundary and Camino Pescadero. The study determined that it would cost approximately $20,166,000 to improve the sidewalks’ conditions and connectivity. The improved sidewalk network will be necessary to safely serve the increased pedestrian traffic associated with build out of the proposed LRDP, and it would be consistent with the Isla Master Plan. The sidewalk improvements are a portion of the approximately $90 million dollars in improvements that are specified in the County’s June 23, 2008 comments which are being re-submitted for reference.

Additionally, the County of Santa Barbara’s Goleta Community Plan and Isla Vista Master Plan envisions bicycle and roadway improvements totaling approximately $174,405,000, which will primarily serve University populations (See Table 1 of this comment section). Of particular importance is the Isla Vista Master Plan’s intended bicycle boulevards to provide adequate facilities for the community’s cyclists. UCSB is expected to support these adopted plans with their own and pay its fair share of these types of improvements as a major developer in the area.

The proposed mitigation is inadequate because it does not appropriately address the physical impacts associated with the increases in bicycle and pedestrian traffic that will occur in Isla Vista.

The following mitigation measures should be incorporated into the DEIR to ensure that the impacts of the proposed LRDP remain less that significant:

1) Provide funding to implement all transportation improvements as specified in the County’s June 23, 2008 comments on the 2008 LRDP and DEIR and in Table 1 of this submission.

**Trans Comment #68 4.13.2.3 2008 LRDP Impacts and Mitigation Measures**

The DEIR discussion acknowledges significant impacts from a delayed housing scenario. These impacts from proposed development can be mitigated through preparation of a phased development and construction plan to be realized prior to increased enrollment. By not increasing enrollment until adequate housing is in place, the potential impacts are greatly reduced and the temporary housing scenarios and corollary transportation impacts are not disclosed, analyzed, or mitigated.

**Trans Comment #69 4.13.2.3 2008 LRDP Impacts and Mitigation Measures**

The removal of Pardall tunnel and replacement with an at-grade intersection on the roadway poses a significant impact that may need more analysis and proposed mitigation. The increased traffic from new high-density residential development along Ocean Road and location of parking structures on Ocean Road will significantly increase traffic. Coupled with high levels of traffic, the proposed removal of the tunnel under Ocean Road and replacement with intermingled bicycle and pedestrian cross traffic may lead to significant congestion and potential for undesirable impacts. The proposed intersections and traffic flow management require further analysis.
Trans Comment #70 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

The discussion of removal of the Pardall tunnel should include a discussion of any potential historical significance, impacts and proposed mitigation if necessary.

Trans Comment #71 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

Proposed bike and pedestrian paths should be designed to accommodate skateboard and scooter traffic. According to the UC Santa Barbara 2006 study cited in RDEIR Section 4.13.1.5, Campus Travel Characteristics, 21% of students that reside at UCSB, Isla Vista, and Goleta travel by foot, skateboard or scooter. The proposed circulation plan should include a discussion of accommodating all modes of non-vehicular transportation.

Trans Comment #72 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

The LRDP identifies proposed ‘Isla Vista Connections’ to improve access to the campus along the proposed Ocean Road development. A majority of the east-west Isla Vista roadways currently ‘dead end’ for vehicles but allow for pedestrian and bicycle passage from UCSB campus. The County has no plans to open these roadway connections between UCSB and Isla Vista for automobile, bus, or service vehicle through-traffic. All references to “Isla Vista roadway connections” as mitigation for potential LRDP-related traffic impacts should be removed from the DEIR and the RDEIR. Isla Vista connections are not proposed as part of the LRDP and the County has not agreed to build these vehicle connections. As such, these improvements should not be included in the discussion of impacts or proposed mitigations and they are not reasonably feasible.

However, should UCSB choose to pursue these connections regardless of the County’s recommendation, it is unclear in the RDEIR if these connections are proposed to allow vehicular access between Ocean Road and Isla Vista. If these connections are proposed to allow vehicular access, the RDEIR must analyze the impacts of increased trips through Isla Vista, especially on Isla Vista intersections. The RDEIR does not evaluate potential impacts associated with the proposed Isla Vista Connections and should be revised to address this omission.

Alternative Mitigation Measure that is Adequate and Feasible

Provide funding to the County to construct all improvements necessary to impacted transportation system to meet the adopted County levels of service policies should UCSB pursue development of any roadway connections between Isla Vista and UCSB’s main campus that allow vehicular traffic.

Trans Comment #73 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

The potential impacts of introducing the bicycle and pedestrian cross traffic to the new vehicle traffic from proposed residential development and parking structures along Ocean Road is not adequately addressed in the RDEIR. The additional traffic generated from the new intersections may greatly increase vehicle and bicycle congestion and lead to increased cars parking in the community of Isla Vista to avoid long wait and pose a threat to bicycle and pedestrian safety.

Trans Comment #74 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

The RDEIR states that a significant impact would occur on County of Santa Barbara roadways operating at LOS C if the 2008 LRDP project increased daily traffic volumes by 1%. However, the DEIR should clarify that any increase in traffic related to a 2008 LRDP project that creates LOS “C” on County roadways or LOS “D” on Isla Vista roadways should be considered a significant impact, as these LOS standards are the County’s adopted thresholds for traffic impacts.

Attachment B: Santa Barbara County Comment Letter, March 30, 2009
UCSB Vision 2025 LRDP & EIR SCH # 2007051128
Trans Comment #75 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

In conjunction with the development of Mesa Road as a primary east-west road at Los Carneros, a new east-west corridor could serve the local UCSB circulation needs while alleviating traffic pressures on regional roadways as alternate routes for UCSB-related traffic. This option should be analyzed in the RDEIR.

Trans Comment #76 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

Tables 4.13-42 and 43: The tables provided misrepresent the impacts of the LRDP since the 2025 No Project scenario does not take into account the approved County and City GTIP improvements. Please revise these tables to reflect LOS operations with the approved improvements.

Trans Comment #77 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

Although Cathedral Oaks Road is a major collector, it is extremely sensitive to volume and speed impacts because of its residential nature for much of the route. For this reason, it is critical to the County that UCSB mitigate traffic impacts to east-west routes in the immediate campus area to avoid spillover as congestion occurs. The DEIR needs to specifically discuss impacts to all east-west roadways in the region and propose specific mitigation measures. Of particular importance are the operations of Hwy 101 and Hollister Ave., which typically handles spillover traffic from Hwy 101 during peak hours and special events. The DEIR should include a discussion regarding the operation of each east-west roadway including analysis and discussion of impacts to Cathedral Oaks Road when breakdowns in levels of service occur on the limited number of alternative east-west routes.

Trans Comment #78 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

LRDP Impacts TRAFFIC-1 - 6 discussion and analysis and their proposed mitigations are inadequate. No evidence is provided to prove that LRDP Mitigation TRAFFIC-1-6 will mitigate the impacts identified in the RDEIR. The County has the following comments regarding the proposed mitigation measures for LRDP Impact TRAFFIC-2, as well as other impacts proposed to be mitigated by the following:

1) Monitoring of transportation conditions is not a mitigation measure for the impacts identified. The proposed mitigation is unacceptable. Monitoring alone does not provide a measurable and definable reduction in the significance of impacts to a less than significant level. A monitoring program for traffic conditions should be proposed in addition to proposed mitigation to ensure that the implementation of the mitigation is effective as the 2008 LRDP is developed, not as mitigation alone.

2) Transportation demand management measures should be specific in types, and relate to quantifiable direct impact reduction. The proposed mitigation is unacceptable. This mitigation measure does not provide a measurable and definable reduction in the significance of the impacts to a less than significant level. This mitigation measure does not clearly define a target LOS for the campus intersections. The mitigation measure should be revised to reference the adopted LOS standard for intersection operations on campus and/or for local jurisdictions. The mitigation measure should be refined to provide a specific project that demonstrates a quantifiable reduction in vehicle trips to identified intersections that is backed by a documented analytical methodology.

3) The proposed mitigation is unacceptable. Coordination with another jurisdiction does not provide a measurable and definable reduction in the significance of impacts to a less than significant level. While the County desires to participate in an effort to cooperatively mitigate impacts created by the 2008 LRDP, absent any specific comprehensive, ongoing mitigation agreement, pledges to work with the County as mitigation are entirely inadequate.
4) Although the RDEIR commits UCSB to paying a proportionate share of mitigating significant impacts to identified intersections and roadways, the mitigation measure states that contribution will include one or more of the following:
   a) Alternative transportation enhancements
   b) Payment of fair-share of improvements based on the methodology presented in this study
   c) Payment towards or construction of all or a portion of specific roadway improvements (especially those that directly benefit University related transportation)

The County finds these proposed mitigations to inadequately guarantee that the improvements needed to support the transportation needs of UCSB in the local area and the region will be funded by UCSB and not by County taxpayers. This mitigation measure should be revised to state “Contribution shall include the following, but is not limited to:” to ensure that the fair-share payment to cover the full costs of mitigation to transportation facilities as outlined in the County’s June 23, 2008 comment letter.

Additionally, as phases of the LRDP are permitted/constructed, a development impact fee agreement should be agreed upon with the County to fund the cost of improvements at the time of construction to mitigate the impacts that occur within each phase. Please quantify the share of current degradation due to current unmitigated UC Santa Barbara development. Please propose a timeline and mitigation for the current impacts as well as proposed new impacts. LRDP Impact TRAFFIC-2, associated impacts and supporting discussion need to remove all references to the City of Goleta, as the City is a separate jurisdiction from the County of Santa Barbara.

Alternative Mitigation Measure that is Adequate and Feasible

1) UCSB shall pay the County of Santa Barbara development impact fee^4 (AB 1600) for transportation pursuant to the Development Impact Fee (AB-1600) as currently calculated by the County of Santa Barbara to mitigate the impacts of the 2008 LRDP to transportation levels of service and facilities, and as calculated by the County of Santa Barbara at the time of the issuance the Notice of Impending Development (NOID), and
2) UCSB shall pay the fair share for the ongoing cost for funding this public service in the amount of $76,700 and shall be revised annually by a percentage equal to the adjustment equal to the annual percentage change in the April Consumer Price Index (“CPI – All Urban Consumers) for the Los Angeles-Anaheim-Riverside Region. Adjustments shall be increased up to the nearest five-cent increment. Adjustments shall automatically become effective on the first day of November at which time payment is due each year without amendment. The payment of UCSB’s fair share of ongoing costs may be offset by direct revenues specifically generated by UCSB and its related population in Isla Vista as described in Attachment C.

Trans Comment #79 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

“Enhance and promote existing TDM measures” are supportable goals. However, the analysis to support the conclusion of a 10% overall reduction as identified in this mitigation is unsupported by any specific programs or mitigation measures. The mitigation is speculative. Though the recirculated section proposed text edits, no supporting evidence for the 10% trip reduction is provided.

Alternative Mitigation Measure that is Adequate and Feasible

Mitigation should contain at least the following parameters to gauge potential success. Sample Mitigation: Given past documented performance of the existing TAP program, funds will be expended on an annual basis by department[s] on the following specific TDM elements: Although text related to fair share payments and a 1-year timeline has been added, the use of subsidized transit passes, car share vehicles, bicycle facilities, etc. while working with outside jurisdiction not changed.
Other reasonable and feasible mitigation measures include source reduction through: (i) the requirement that all on-campus residents of University housing be prohibited from owning their own automobile; and (ii) imposition of a refundable registration fee for students who voluntary relinquish ownership of an automobile. In the case of the second measure, for students and faculty that retain ownership of a vehicle, the registration fee paid by such individuals could be applied toward capital improvements necessary to mitigate traffic impacts or toward the funding other TDM measures. This amounts to a user fee that is charged to persons who contribute to the impacts.

**Trans Comment #80 4.13.2.3 2008 LRDP Impacts and Mitigation Measures**

It is inadequate to propose specific mitigation of adverse impacts through a future study/work effort. The proposal to “work with” outside jurisdictions is vague and the value of mitigation against adverse impacts cannot be evaluated or quantified. The mitigation must contain specific milestones related to funding levels, timelines and specific transit programs. These comments provide a significant number of mitigation measures that if implemented would have a measurable impact at reducing environmental impacts.

**Trans Comment #81 4.13.2.3 2008 LRDP Impacts and Mitigation Measures**

The reference to “alternative transportation enhancements” is not specific and the value of mitigation against adverse impacts cannot be evaluated or quantified. The mitigation is vague and must contain specific milestones related to funding levels, timelines and specific transit projects, such as the transit projects identified in Table 1 below.

**Trans Comment #82 4.13.2.3 2008 LRDP Impacts and Mitigation Measures**

The intersections identified for mitigation monitoring should include the intersections of El Colegio/Los Carneros and Storke/El Colegio since the 2008 LRDP will have a significant impact on these roadways and intersections.

**Trans Comment #83 4.13.2.3 2008 LRDP Impacts and Mitigation Measures**

As illustrated by road patterns depicted Figure 1 of this comment letter, mitigation to east-west roadways is imperative to prevent major impacts at already poorly operating locations. The RDEIR should address the limited east-west roadways in the region. An analysis should be performed that considers all of the east-west regional roadways including each route’s sensitivity to breakdowns in levels of service. Roadways such as Cathedral Oaks Road, US 101, and Hollister Avenue should be analyzed. The RDEIR mitigation is inadequate and ineffective in these areas. UCSB should mitigate their impacts by assisting the County of Santa Barbara with necessary improvements to the County transportation infrastructure necessary to mitigate impacts to traffic and air quality as outlined in these comments and those submitted in June 2008. Additionally, project-specific mitigations may also be necessary to ensure that project specific impacts are less than significant.

**Alternative Mitigation Measure that is Adequate and Feasible**

UCSB shall pay the County of Santa Barbara for its fair share of improvements to County of Santa Barbara transportation infrastructure including, but not limited to, intersection and roadway segment improvements as numerated below in Table 1.
### TABLE 1, Section 4.13: Transportation Comments

**COUNTY OF SANTA BARBARA**
**DEPARTMENT OF PUBLIC WORKS**
**Transportation Division**

**2008 UCSB LRDP Transportation Mitigation Payment Calculation**
**May 22, 2008**

<table>
<thead>
<tr>
<th>Projected Required Mitigation Projects</th>
<th>Estimated Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>ROADWAYS</strong></td>
<td></td>
</tr>
<tr>
<td>1 Los Carneros Road Widening</td>
<td>$4,000,000</td>
</tr>
<tr>
<td>2 Phelps Road Extension</td>
<td>UCSB</td>
</tr>
<tr>
<td>3 Fowler Road Extension</td>
<td>City of Goleta</td>
</tr>
<tr>
<td>4 Storke Road Widening</td>
<td>$4,000,000</td>
</tr>
<tr>
<td>5 Hollister Widening from San Antonio Road to SR 154</td>
<td>$19,700,000</td>
</tr>
<tr>
<td>6 Turnpike Road Widening from Calle Real to Cathedral Oaks Road</td>
<td>$6,500,000</td>
</tr>
<tr>
<td>7 US 101 Widening – 6 Lanes from Storke Road to Fairview Road</td>
<td>Caltrans</td>
</tr>
<tr>
<td><strong>SUB-TOTAL:</strong> $34,200,000</td>
<td></td>
</tr>
<tr>
<td><strong>INTERSECTIONS</strong></td>
<td></td>
</tr>
<tr>
<td>8 Los Carneros Road/Mesa Road Intersection Improvements</td>
<td>$2,750,000</td>
</tr>
<tr>
<td>9 Hollister Avenue/Storke Road Intersection Improvements</td>
<td>City of Goleta</td>
</tr>
<tr>
<td>10 El Colegio Road/Storke Road Intersection Improvements</td>
<td>$2,500,000</td>
</tr>
<tr>
<td>11 Turnpike Road/Calle Real Intersection Improvements</td>
<td>$2,000,000</td>
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<tr>
<td>12 Hollister Avenue/Patterson Avenue Intersection Improvements</td>
<td>$2,500,000</td>
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<tr>
<td>13 Hollister Avenue/Storke Road Intersection Improvements</td>
<td>City of Goleta</td>
</tr>
<tr>
<td>14 Hollister Avenue/Los Carneros Road Intersection Improvements</td>
<td>City of Goleta</td>
</tr>
<tr>
<td>15 Traffic Signals – Various Locations (4 Intersections)</td>
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<td><strong>SUB-TOTAL</strong> $11,550,000</td>
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<tr>
<td><strong>NEIGHBORHOOD TRAFFIC MANAGEMENT</strong></td>
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<td>16 Traffic Calming Devices</td>
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<tr>
<td><strong>INTERCHANGES</strong></td>
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<tr>
<td>17 US 101/SR 217/Patterson Avenue Interchange Improvements</td>
<td>Caltrans</td>
</tr>
<tr>
<td>18 US 101/Storke Road/Glen Anne Road Ramp Intersection Improvements</td>
<td>Caltrans</td>
</tr>
<tr>
<td>19 US 101/Los Carneros Road Ramp Intersection Improvements</td>
<td>Caltrans</td>
</tr>
<tr>
<td>20 US 101/Fairview Road/Calle Real Interchange Improvements</td>
<td>Caltrans</td>
</tr>
<tr>
<td>21 US 101/Turnpike Road Ramp Intersection Improvements</td>
<td>Caltrans</td>
</tr>
<tr>
<td>22 US 101/Hollister Avenue Interchange Improvements</td>
<td>Caltrans</td>
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<tr>
<td><strong>ISLA VISTA</strong></td>
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<tr>
<td>23 Embarcadero Loop Roadway Improvements</td>
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<tr>
<td>24 El Embarcadero Roadway Improvements</td>
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<tr>
<td>25 Camino Pescadero Roadway Improvements</td>
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</tr>
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<td>26 Sabado Tarde Roadway Improvements</td>
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<tr>
<td>27 Camino Del Sur Roadway Improvements</td>
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<tr>
<td>28 Pardall Road from Embarcadero Del Norte to UCSB</td>
<td>$1,500,000</td>
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<tr>
<td>29 Del Playa Drive Roadway Improvements</td>
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<tr>
<td>30 Embarcadero Del Norte/Pardall Road Intersection Improvements</td>
<td>$1,750,000</td>
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<td>31 Embarcadero Del Mar/Pardall Road Intersection Improvements</td>
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<tr>
<td>32 El Embarcadero Intersection Improvements</td>
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<td>Project Description</td>
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<tr>
<td>Isla Vista Traffic Calming</td>
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<tr>
<td>Isla Vista Sidewalks – Sidewalk In-Fill Various Locations</td>
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<td><strong>SUB-TOTAL:</strong> $48,920,000</td>
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<td><strong>BIKEWAY IMPROVEMENTS</strong></td>
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<td>San Jose Creek Class I Bike path - Cathedral Oaks to Hollister</td>
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<td>San Jose Creek Class I Bike path - Hollister Ave. to Goleta Beach</td>
<td>$3,850,000</td>
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<td>Ekwill St. Class I Bike path - Ekwill to Maria Ygnacia Creek</td>
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<tr>
<td>Patterson Ave Class II Lanes-Hollister Ave to Atascadero Creek Bike Path</td>
<td>$523,000</td>
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<td>Patterson Ave Class II Lanes - Cathedral Oaks to Calle Real</td>
<td>$400,000</td>
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<tr>
<td>Obern Trail - Pedestrian Trail, Bikepath</td>
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<tr>
<td>San Antonio/Maria Ygnacia - Class I Bike path Improvements</td>
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<td>San Pedro Class I Bike path - From Fowler Road to Goleta Beach</td>
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<td>Patterson Ave Class II Lanes - Various Locations</td>
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<td>Bikeway Signage Program-Continue On - Going Bikeway Signage Program</td>
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<td>Class I Bikeway Lighting - Illuminate Key Class I Facilities</td>
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<td><strong>SUB-TOTAL:</strong> $12,548,500</td>
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<td><strong>TRANSIT IMPROVEMENTS</strong></td>
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<td>Purchase Battery Chargers - 5 Battery Chargers for Recharging Shuttles</td>
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<tr>
<td>Purchase of Shuttles - New Transit Route, Patterson/Turnpike-4 Shuttles</td>
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<td>Purchase of Busses - New Transit Route, Santa Barbara/Fairview Express</td>
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<td>Purchase of Busses - 2 New busses to maintain Trunk Line Level of Service</td>
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<tr>
<td>Bus Stops - Construct Bus Stops, Turnouts &amp; Pavement Reinforcement</td>
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<td>Passenger Boarding Improvements - Provide ADA Access Improvements</td>
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<td><strong>SUB-TOTAL:</strong> $1,842,000</td>
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<td><strong>SIDEWALK IMPROVEMENTS</strong></td>
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<td>Hollister Avenue, Puente Drive, Etc.</td>
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<td><strong>SUB-TOTAL:</strong> $1,380,511</td>
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<td><strong>PLAN ADMINISTRATION</strong></td>
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<td>Model, Cost Estimates and Fee Calculation Updates</td>
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<td>Project Study Reports</td>
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<td>Future Plan Administrative Costs</td>
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<tr>
<td><strong>TOTAL:</strong> $112,891,011</td>
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</table>

Notes:
The County of Santa Barbara, Department of Public Works reserves the right to revise this improvement list and total cost estimates provided above, as well as revise the payment calculation shown below. Significant mitigations including project specific mitigations may be identified as further information is obtained from the University of California, Santa Barbara.

Projects listed for jurisdictions other than the County of Santa Barbara were included to disclose in full the improvements needed to mitigate impacts to the operations of the County transportation network.

Projects shown in bold are included in the current Goleta Transportation Improvement Plan (GTIP).
UCSB LRDP Transportation Mitigation Payment Calculation:

<table>
<thead>
<tr>
<th>Description</th>
<th>Calculation</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Trips - Remaining in Current Plan (1,841) Plus UCSB LRDP (7,282)</td>
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<tr>
<td>Revised Peak Hour Trip Cost (Current Plan plus UCSB LRDP)</td>
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<td>$12,240</td>
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<tr>
<td>0.62 PHTs/Apartment x Revised GTIP Fee</td>
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<td>LRDP Proposed Apartments</td>
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<td>Sub-Total</td>
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<td>$22,470,734</td>
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<tr>
<td>0.52 PHTs/Townhouse x Revised GTIP Fee</td>
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<tr>
<td>LRDP Proposed Townhouses</td>
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<tr>
<td>Sub-Total</td>
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<td>$11,927,793</td>
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<tr>
<td>2.54 PHTs/1000 Sq. Ft.</td>
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<td>Proposed Square Feet (1000s)</td>
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<tr>
<td>Sub-Total</td>
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<tr>
<td><strong>Total UCSB LRDP Transportation Mitigation Payment</strong></td>
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<td><strong>$90,360,545</strong></td>
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</table>

*Total Mitigation Payment subject to changes annually by Construction Cost Index (CCI)*

The above project list is based on the Goleta Transportation Improvement Plan (2007 Cost Estimates Update) and the Isla Vista Sidewalk Initial Study (County of Santa Barbara, Department of Public Works, 2006). Mitigation measures for UCSB LRDP impacts to any and all County of Santa Barbara transportation facilities listed above, as shown in TRANS Comments Figure 1 below and as proposed in all of the comments in this document are subject to further refinement as UCSB provides more information.
Figure 1: 2008 LRDP DEIR Transportation Mitigation Improvement Projects
Trans Comment #84 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

The number of County intersections included in the traffic impacts analysis is inadequate, particularly in Isla Vista. It is reasonably foreseeable that proposed Campus growth could be to increase UCSB trips by an estimated 25-35%. That level of increase will have impacts to County roadways and intersections throughout the South Coast.

Alternative Mitigation Measure that is Adequate and Feasible

An analysis of all Isla Vista intersections on Embarcadero Del Norte for the proposed project should be provided within the document in tabular form and must disclose and mitigate the inevitable decrease in service and associated impacts on air quality, noise, and surrounding resources at these Isla Vista intersections and roadways. Furthermore, the “with project” analysis should include a discussion and analysis of the seven proposed roadway connections to Ocean Road from the Isla Vista area. Please note that the County of Santa Barbara has no plans of developing vehicle connections between Isla Vista and UCSB’s main campus.

Trans Comment #85 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

The RDEIR proposes the payment of the University’s fair share of the cost of improvements to mitigate impacts to traffic in the County of Santa Barbara. However, the RDEIR fails to provide estimated costs from adequate fair-share calculations based on quantifiable traffic volume contributions. Additionally, cost estimates for foreseeable intersection improvements are also missing from the report. The cost of improvements and a proposed fair share agreement and payment should be assessed and disclosed as part of the mitigation proposed in the RDEIR.

Trans Comment #86 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

The RDEIR provides discussions of mitigation measures without consideration or analysis of consequences should proposed mitigation goals not be met. Additionally, the RDEIR does not propose any specific monitoring to ensure adequate mitigation. The document attempts to leave it up to UCSB to determine which, if any, fees it will pay for transportation mitigation measures. The document should specify specific impacts to off-campus transportation facilities and propose specific mitigation measures that could range from directly mitigating the impact to paying fees to a regional transportation improvement plan so the University is paying its fair share to improve a transportation facility.

Trans Comment #87 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

According to the DEIR, significant development is still pending under the 1990 LRDP, including 976 beds, 151 student family units, and 172 faculty and staff units, as conditions under 2025 No Project. However, these increases in development and population are not considered as part of the baseline population for the RDEIR analysis. Instead, the RDEIR analysis considers the average enrollment of 20,000 students and 4,685 faculty and staff as the baseline, which inaccurately represents the total UCSB population in the 2007-08 school year. Table 4.13-26 should be revised to depict actual population numbers as the baseline compared to 2025 plus LRDP population projections (5,000 additional students, and 1,700 faculty and staff) for the DEIR impact analysis.

Trans Comment #88 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

UCSB shall provide its fair share payment to all project specific impacts. In areas with multiple modal choice impacts (i.e. bike, pedestrian and vehicle conflicts), the County will consider improvements that offer an
effective solution for all travel modes, provided roadway operations meet the County minimum LOS standard.

Trans Comment #89 44.13.2.3 2008 LRDP Impacts and Mitigation Measures

The UCSB LRDP does not assume the completion of the County of Santa Barbara and the City of Goleta’s GTIP roadway improvements. This assumption misrepresents the LRDP impacts to the local roadways since implementation of the improvements maintains LOS C operations under 2025 conditions. The LRDP DEIR should be revised to reflect completion of these approved improvements under the 2025 scenario.

Trans Comment #90 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

Table 4.13-42 through Table 4.14-45 documented the intersection analysis results under the With Mitigation conditions. However, those improvements are not included in the bullet lists on Page 4.13-96 through Page 4.13-97. Please list mitigation measures for each intersection and illustrate the improvements graphically.

Trans Comment #91 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

The proposed mitigation provides for LOS D operations at the Hollister/Los Carneros intersection. The County and City of Goleta acceptable LOS for intersections is LOS C. Please provide proper mitigation to meet the LOS standards for the applicable jurisdiction.

Trans Comment #92 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

The LRDP identifies intersections that are below LOS C under the 2025 scenario. These numbers do not appear to reflect the implementation of the County and City GTIP improvements. Because these improvements are included in approved documents, they should be assumed in place and functional under the 2025 scenario, regardless of funding. Please revise this paragraph to reflect LOS operations with the approved improvements.

Trans Comment #93 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

The RDEIR proposes to partially mitigate the impacts to levels of service at the Hollister/Storke Intersection and other local roadways by widening westbound Phelps Road to contain a left, through, and right turn lanes and by constructing the Phelps/Mesa Connection to direct traffic through the Storke Wetlands to connect at Los Carneros Rd. The DEIR claims that these improvements would “also improve peak hour operations” to a level lower than Year 2025 no project conditions. This connection has been contemplated by the County in the adopted GTIP, but the design and construction of the connection and widening would be the responsibility of the City of Goleta, as the proposed improvements lie within the incorporated city limit.

Though the Phelps/Mesa Road widening and connection project has been considered by the County in past and is generally supported, it has not been analyzed for environmental impacts by UCSB or the RDEIR. It is reasonable to assume that the significant impacts of the proposed Phelps improvements may have prohibitive impacts on air quality, traffic volumes, wetland habitat, noise, land use, and neighborhood compatibility aesthetics. Without adequate study, analysis and disclosure of the feasibility of the Phelps Road improvements and all environmental impacts, the widening and connection project does not adequately mitigate the impacts of the 2008 LRDP on local roads serving residential development on Phelps Road.
Alternative Mitigation Measure that is Adequate and Feasible

The RDEIR should analyze the impacts to biological resources, aesthetics, alternative transportation, noise, and air quality resulting from the proposed widening and connection of Phelps Rd. to Mesa Rd as part of the RDEIR. Adequate alternatives should be developed that would alleviate existing and future impacts to traffic levels of service should the Phelps/Mesa Road project be infeasible due to constraints.

Trans Comment #94 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

The RDEIR reflects LOS E operations at the Storke/Hollister intersection under the 2025 scenario. This assumes the approved GTIP improvements are not implemented. Please revise this paragraph to reflect LOS operations with the approved improvements. The approved County and City standard is LOS C.

Trans Comment #95 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

The County has the following comments regarding proposed mitigation measures. In particular, the County is concerned that mitigation payments to local jurisdiction coincide with the rate and type of development under the 2008, as follows:

1) Please clarify the method and timeline for the proposed enhancement and promotion of existing transportation demand management measures. Identify the impact of current development and propose targeted monitoring. If there is a current impact, there is no reason not to identify immediate mitigation measures. Current development impacts may not been adequately mitigated and should be addressed before new development may be considered.

2) UC Santa Barbara development plan mitigation should not rely on maximum potential development considered in the County and City community plans. Mitigations for development in Isla Vista are the responsibility of the individual developer as directed by the regulatory agency. The UC projects are not independent developers but rather the entity itself. Therefore, proposing a proportional share of mitigation that relies on potential development, which itself should require appropriate mitigations for individual projects if and when they are realized, is not an appropriate method of determining mitigation. It would be more appropriate for the complete impacts of the proposed development to be mitigated by the developer (UC Santa Barbara) prior to the construction of the proposed development.

3) The RDEIR proposes contribution of mitigation payments no later than the start of construction. However, mitigation fees should be paid prior to the start of construction to ensure that measures are in place prior to impacts from the development. Efforts should be made to plan so that there is not a lag time between development and impact mitigation.

4) The RDEIR discussion includes neighborhood-serving retail measures as mitigation for traffic impacts. However, adding retail uses to the UC main campus may have its own significant impact to the local economy and negatively affect Isla Vista community businesses. The impacts of this proposed measure must be studied. Please explain how additional commercial uses on the main campus meet the education mission of the UC development plan.

Trans Comment #96 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

It is difficult to evaluate the effectiveness of the proposed mitigation overall because it is unexplained how the improvements will improve connectivity and guarantee reasonable use by UCSB students, faculty, and staff.
Trans Comment #97 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

The RDEIR references significant impacts with no reference to the LOS, actual impact or a mitigation measure to reduce the impacts to a less than significant level. The RDEIR should be revised to reflect the above referenced items to make the impacts and mitigation measures it more apparent to the reader.

Trans Comment #98 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

The proposed mitigation fails to identify who will determine “appropriate transportation facilities.” An actual investment in specific transit projects would be required to provide for measurable transit mitigation. As written, any conclusion of mitigation for adverse impacts is speculative.

The County has provided a list of improvements and calculated UCSB’s fair share contribution in Table 1 to adequately mitigate the impacts to local transportation attributable to the 2008 LRDP.

Trans Comment #99 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

LRDP Mitigation Measure TRAFFIC-10A is inadequate. The UCSB parking survey results (Table 4.13-17 and 4.13-18) indicate approximately 1,530 faculty/staff and students are parking off-campus in Isla Vista and Goleta Beach on a daily or frequent basis. For Isla Vista, this represents 25% (885 spaces) of the on-street parking spaces are being used daily by UCSB affiliates. The DEIR acknowledges off-campus parking intrusion by UC Santa Barbara affiliates. This has historically been a concern due to the close proximity of free parking spaces in Isla Vista and at Goleta Beach.

Alternative Mitigation Measure that is Adequate and Feasible

The LRDP needs to propose specific mitigation measures such as fully accommodating the parking needs of the UCSB faculty, staff and students. The LRDP and DEIR need to discuss the specific impacts to the Isla Vista community and proposed specific mitigation measures such as building more parking spaces and reducing parking fees so using UCSB provided spaces becomes more attractive.

Trans Comment #100 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

LRDP Mitigation TRAFFIC-10A relies on UC Santa Barbara contributing its fair-share towards the implementation of a parking permit program in Isla Vista. As noted on page 4.13-133, Santa Barbara County has attempted to implement a parking permit program in Isla Vista but was unable to receive approval from the Coastal Commission. Due to the future uncertainty surrounding approval of a parking permit program in Isla Vista, the 2008 LRDP & DEIR shall disclose this issue and identify additional mitigation measures to alleviate off-campus parking intrusion in Isla Vista and at Goleta Beach associated with buildout of the LRDP.

Alternative Mitigation Measure that is Adequate and Feasible

Mitigation may include, but are not limited to prohibiting cars for all on-campus residents; providing free on-campus parking for UCSB students, specific alternative transportation measures that have documented efficacy at reducing automobile trips, faculty and staff; designate long term parking versus day parking lot to allow student to store their cars on-campus, alleviate impacted Goleta Beach Parking in Isla Vista; develop additional free parking spaces within UCSB and Isla Vista.

Trans Comment #101 4.13.2.3 2008 LRDP Impacts and Mitigation Measures

As noted in earlier remarks, the County knows of at least one mitigation measure identified in the FEIR for the 1990 LRDP that has not been executed by the University. The measure entails the relocation of the
main UCSB entrance from El Colegio Road to Mesa Road. This was proposed and listed as the mitigation for traffic impacts to El Colegio Road and Isla Vista intersections as well as air quality. The consequence is a large unmitigated residual traffic impact. A second potential violation of the 1990 Mitigation Implementation Agreement is that fact that current UC enrollment exceeds the 1990 cap of 20,000 students by approximately 1,100 persons.

Ongoing mechanisms are needed to ensure that identified mitigation measures are implemented in an appropriate and timely manner. A detailed mitigation reporting and monitoring program is needed and should be furnished as part of the EIR. In addition, the County recommends that the LRDP itself embody policies that reinforce the University’s obligations under CEQA. Sample language is provided below:

“LRDP: Trans-15: The University shall cooperate with the County in devising parking and traffic management strategies to mitigate off-campus impacts. All reasonable and feasible measures necessary to mitigate the impacts of UCSB development and operations on Isla Vista and surrounding areas shall be identified and implemented in conjunction with all new on-site development.”

“LRDP: Trans-16: Prior to undertaking any project covered by the LRDP, the University shall devise and implement an Environmental Quality Assurance Program encompassing two basic components: (i) a Development Component covering the implementation of Mitigation Measures identified in 2008 LRDP Final EIR during the construction phase of the Project; and (ii) an Operational Component covering implementation of transportation demand measures, payment of development impact fees, land management practices and other ongoing mitigation. The Environmental Quality Assurance Program shall be developed in cooperation with the County of Santa Barbara and shall embody the following elements:

1) Project Logistics. The scope, format, methodology, timing and submittal requirements of environmental documentation, pre-construction surveys and associated mitigation.

2) Governmental Permits. The scope, timing and procurement of all permits required for the Project by Responsible Agencies including, but may not be necessarily required by, the U.S. Army Corps of Engineers, Regional Water Quality Control Board, California Coastal Commission, Cal Trans and County of Santa Barbara.

3) Monitoring and Reporting Protocols. The delineation of roles, responsibilities, intervals, frequency and duration of monitoring and compliance reporting by and between the University, Isla Vista community, City of Goleta and County of Santa Barbara.

4) Lines of Authority. Lines of authority, security measures and enforcement responsibilities for managing parking permit programs, transportation demand measures and similar ongoing activities.”

Trans Comment #102 Additional Technical Remarks Specific to RDEIR

- P4.13-20 Table 4.13-10: The Isla Vista Master Plan FEIR and Goleta Community Plan classify Camino Corto, Camino Del Sur, Camino Pescadero, Embarcadero Del Mar, and Embarcadero Del Norte as S-2 roadways as opposed to the LRDP which classifies these road segments as S-1. Please clarify and reconcile.

- Figure 4.13-6: Parking lot color should be revised for Lots 10, 12, 15, 18, 24, 29, and 30.

- P4.13-39, Table 4.13-18: Percentages were calculated based on total surveys, not on total responses. For those who did not respond, it is unknown where they choose to park. In the interest
of statistical integrity, percentages should be calculated based on the total responses to the survey. Under the same assertion, Table 4.13-19 reflecting the total population is inadequate as well.

- **P4.13-65, 4th paragraph, second sentence**: The RDEIR describes trip generation as based on the counts collected at the existing campus housing, not the campus gateways. However, this methodology does not account for cut-through trips to reach destinations in the area. Please update the text.

- **P4.13-65, 5th paragraph, 4th sentence**: The RDEIR states “Although many students and faculty/staff typically commute to campus in a mode other than a SOV, they may occasionally drive to campus, which was not reflected in the travel survey results”: But the survey results, Table 4.13-25, has the mode of travel, and also the appendices Tables 6, 7 and 8 which has the inbound and the outbound traffic should include all types of mode. Please reconcile.

- **P4.13-66, 2nd and 3rd paragraph**: The trip generation calculation, which was based on the actual counts conducted at the existing housing complexes, includes all types of trips (trips to and from the campus or elsewhere). Since real data was used, it is unreasonable to apply a 25% reduction for internalized trips.

- **TDF Model**: The model did not account for existing bicycle and pedestrian volumes and associated impacts on local transportation systems, and these factors were not forecasted nor taken into account for the analysis of future conditions. Additionally, no model is provided for the housing delay scenario in the appendix. Please describe how these volumes were estimated, and which assumptions were made in the calibration of the traffic model. Also, Year 2025 with LRDP without Proposed Student and Faculty/Staff Housing only analyzed vehicle miles traveled (VMTs). Please explain why other data was not provided.

- **Appendix 4.13-3: Model Trip Generation (Page 30) Table 25 and 26**: The 2005 City of Goleta traffic model does not take into account the pedestrian or bicycle in the trip generation. The intrazonal trips in the City model must be the vehicle trips, perhaps from West or Storke campus to the Main campus or vice versa. With the LRDP model being refined to have more TAZs, the trips that used to be accounted as intrazonal trips in the City model should be accounted as internal (TAZ to TAZ) trips in the LRDP model.

- **Model Validation and Future Forecast**: Comparing the traffic volumes along Embarcadero Del Norte south of Pardall Rd and the peak volume of the 2005 pm directional model at the same location, a substantial difference in the volumes was observed. The accuracy of the growth factor (calculated from the 2005 and 2025 model and applying to the existing volumes Feb 2006) is questionable. The same discrepancy is noted for other locations as well. A select zone analysis or a graphic showing the Trip assignment of the new LRDP projects is not included in the RDEIR which is needed to adequately determine the study intersections and roadway segments. Please clarify and reconcile.
4.14 Water Supply

W Comment #1 General Comment

The Goleta Water District articulated methodological shortcomings in the RDEIR analysis and will be offering a wealth of comments on the inadequacy of the water supply and demand analysis contained in the DEIR and REIR. The comments call into question the favorable supply assumptions utilized in the RDEIR as well as the water use factors. The County concurs with the input and comments of the Goleta Water District; in summary, the conclusions in the REIR are based on faulty assumptions and thus are not supported by substantial evidence and fail to provide reasonable and feasible mitigation measures to reduce impacts to the region’s water supply.

W Comment #2 4.14.1.3 Future GWD Water Demand

In order to fully evaluate water supply availability, water supply and demand analysis needs to be based on both annual demand and peak daily demand. Only annual demand is used in the analysis. Please provide additional analysis based on peak daily demand.

W Comment #3 4.14.1.3 Future GWD Water Demand

In calculating future water demand, the number residential units proposed under the 2008 LRDP does not coincide with the total in Tables 4.14-10 through 4.14-13. Together, new residential units shown in these tables add up to 3,304 compared to 5,443 bedspaces and 2,113 dwellings appearing in Table 4.10-21. Please clarify and reconcile.

W Comment #4 4.14.1.3 Future GWD Water Demand

The analysis should consider the future water demand of the secondary/indirect growth associated with the University as identified in Section 6.0: Other CEQA Consideration of the DEIR. As noted under Population and Housing herein (POP Comment 18: 4.10.2.3. LRDP Impact POP-4), indirect impacts attributable to the 2008 LDRP total 12,105 persons. Indirect impacts attributable to the University must be addressed in addition to the 11,106 persons directly attributable to UC growth. These indirect growth projections will cumulatively have an impact on the availability of water to the Goleta Water District area.

W Comment #5 4.14.1.5 Regulatory Context

This discussion needs to disclose that water in excess of those amounts held in the name of local districts is held by Central Coast Water Authority as a drought buffer, and is therefore not available for other uses, including the University’s future needs under the 2008 LRDP.

W Comment #6 4.14.1.6 Cumulative Setting

This section provides no discussion of reasonably foreseeable projects to be considered in the Cumulative Impacts section. The evaluation of future demand appearing in Tables 4.14-10 through 4.14-14 only considers approved, but yet constructed projects. In short, the Cumulative Impacts section for water supply is essentially omitted. Given the importance of water supplies in Santa Barbara County and the South Coast area in particular, a robust analysis of cumulative impacts is needed to understand the LRDP’s potential effect in combination with other foreseeable projects. In particular, the RDEIR should consider the impacts of long range planning efforts in the County of Santa Barbara, the City of Santa Barbara, and the City of Goleta in terms of cumulative impacts of population growth and development.
W Comment #7  4.14.2.3 Cumulative Impacts

LRDP Impact W-2 claims that the increase in demand for water resulting from the 2008 LRDP “may necessitate the pumping of additional groundwater from the Goleta Groundwater Basin.” This impact is listed as less than significant, and no mitigation measures are required. The impact, however, of resuming groundwater pumping from the Goleta Groundwater Basin may in fact have significant and unavoidable environmental impacts. There is no analysis of the impacts that might result from resuming pumping of the basin. Furthermore, the Goleta Water District currently uses the Goleta Groundwater Basin as a storage facility to bank excess water from the Cachuma and State Water Projects. If pumping resumes, the Goleta Water District’s reserves will be lowered, and this may have a significant impact in future critically dry and drought years.

W Comment #8  4.14.2.3 Cumulative Impacts

LRDP Impact W-3 and its proposed mitigations do not adequately address nor secure potable water needed to accommodate the proposed growth. Stating that the increase in population under the 2008 LRDP “may increase demand” is not logical. The significant increase in students, faculty and staff will clearly increase the demand for water. The proposed mitigations do not demonstrate the availability of supplemental supplies. In addition, the proposed mitigation of conservation/retrofitting does not provide a schedule or estimate of water savings. Thus the statements regarding adequacy of supply for the LRDP are without basis. The proposed Residual Significance level is inadequate.

LRDP Mitigation W-3B proposes to individually meter all new UCSB living units or buildings and charge each unit based on water use. This efficacy of this measure is questionable in large dormitory-style facilities where common bathrooms and kitchens are used by numerous students, making individual charges infeasible. This mitigation will only be effective in “apartment-style” units and faculty/staff homes.

LRDP Mitigation W-3C proposes the installation of water saving devices in all new buildings and in all existing buildings. Without a pre-determined timeline for installation in existing buildings, this mitigation measure will also have limited effectiveness.

LRDP Mitigation W-3D and 3E are both vague and unenforceable. These measures will have limited, if any, effect on mitigating Impact W-2.

LRDP Mitigation W-3F is unenforceable as written. By saying that the University “shall work to identify and acquire additional water supplies beyond those currently available to GWD” mitigation measures which provide a level of certainty to address impacts are ignored. Without a solid requirement for the University to actually acquire enough water for the LRDP’s needs (not just to “work to identify and acquire water”), the impact ignores reasonable and feasible mitigation measures.

Alternative Mitigation Measure that is Adequate and Feasible

The proposed mitigations need to ensure that potable water for the proposed growth is secured. The mitigations should disclose the needed water entitlements to accommodate the 2008 LRDP growth. If at any point, demand for water attributable to the University has the potential for exceeding supply, then a reasonable and feasible mitigation measure would be to phase enrollment, faculty/staff growth and facility construction with the capacity of available water supplies. Significant impacts to water supply impacts, regardless of whether they are temporary, are avoidable.
4.15 Wastewater

WW Comment #1  General Comment

The County of Santa Barbara concurs with the input and comments of local sanitary districts, as this utility is served by Goleta Sanitary District (GSD) and Goleta West Sanitary District (GWSD).

WW Comment #2  4.15.2.3 2008 LRDP Impacts and Mitigation Measures

LRDP Impact WW-1: If the LRDP is approved as planned, the wastewater flows from the University will exceed the University’s portion of the wastewater facility’s capacity, the University’s capacity under the GSD’s NPDES permit and the GSD’s NPDES permit capacity. The only mitigation measures suggested by the RDEIR involve the University “requesting” that the GSD and the GWSD apply for new NPDES permits and for the University to “negotiate” the acquisition of additional design capacity in the GSD wastewater treatment plant. These mitigation measures are unenforceable and will do little, if anything, to reduce the significant impact if the NPDES permit is denied or additional capacity is not granted. Mitigation measures to reduce wastewater generation of existing and proposed facilities are not analyzed.

Alternative Mitigation Measure that is Adequate and Feasible:

The University should have to ensure that it owns an adequate portion of the GSD wastewater treatment facility’s capacity before the LRDP is allowed to progress. This may involve the University having to make a financial contribution to the expansion of the wastewater treatment plant. The University should contribute to the cost of the GSD and the GWSD’s applications for modification or re-issuance of their NPDES permits.
Endnotes and References

1 Affordability is based on the assumption that a worker could afford a rental payment equal to 33% of this/her gross monthly income.
2 RDEIR, page 4.10-36, provides this data regarding indirect population and job growth.
3 The EIR indicates that 2,214 new jobs will be created as a result of the implementation of the LRDP. The vast majority of the new off campus jobs to service the direct UCSB population growth of 11,071 will be in the retail, hospitality, and service sector industries. We know that there are 1.2 jobs per household which means that 1,845 new households will be created. The average household size in the south coast is 2.6 persons. From that we can calculate that 4,797 new indirect people, given the projections would come to the south coast as indirect result of job growth to service the direct LRDP population growth.
4 Currently Transportation DIF estimated at $57,008,800 + $33,150,300.
Response to comment R-26-COVER-1. Please see response to comment I-26-10.

Response to comment R-26-COVER-2. Please see response to comment R-21-21H. The Virtual University alternative does not meet the University’s goals of collaborative learning and faculty student interaction because it would not provide actual face-to-face interaction, and would greatly limit the time available for interaction and collaboration.

Response to comment R-26-COVER-3. The No On-Campus Housing Alternative was considered because it would reduce or avoid some of the Project’s significant environmental impacts while meeting some of its objectives. The No Project Alternative was identified as the environmentally superior alternative because it would have fewer significant environmental impacts than other alternatives. DEIR at 5.0-34.

Response to comment R-26-COVER-4. Regarding the alternative of purchasing housing in Isla Vista, please see response to comment A-17-5.0. Regarding the alternative of housing upper-class students, the LRDP proposes to provide housing to accommodate all new enrollment and faculty/staff added under the LRDP. Housing exiting Campus population, which appears to be the goal of this proposal, would not address any of the Project’s potential environmental impacts.

Response to comment R-26-COVER-5. Because the Campus is not subject to local land use regulation, the DEIR does not consider whether development under the LRDP promotes other jurisdiction’s policies or goals. The DEIR does consider, in Impact LU-3, those policies of the Goleta Community Plan that relate directly to the Campus, and determines that the LRDP would have a less than significant in relation to those policies. No further mitigation is required.

Response to comment R-26-COVER-6. Please see response to comment A-17-LU-17.

Response to comment R-26-COVER-7. No development under the LRDP will divide any part of Isla Vista from any other part of Isla Vista. Moreover, Mitigation Measures AES-3A and 4A will ensure that development along Ocean Road and on the Storke Campus will be compatible in scale, proportion and appearance with adjacent existing neighborhoods.

Response to comment R-26-COVER-8. The conclusion of Impact LU-7 is supported by the discussions and conclusions of Impacts LU-1 through 6.

Response to comment R-26-COVER-9. All mitigation measures to be implemented by the University would be adopted as part of the approval of the Project and would be included in the Mitigation Monitoring and Reporting Plan, and would therefore be binding. Where mitigation would be implemented by another jurisdiction, the EIR acknowledges this fact and alters its significance conclusion when appropriate. All mitigations that allow for precise mitigation design as part of project-level environmental review provide performance standards to ensure that the measure effectively reduces or avoids the relevant environmental impact.

Response to comment R-26-COVER-10. The discussion of residence patterns on RDEIR page 4.10-5 includes the 40% of students who live in Isla Vista among the 70% of students who live off-campus. Regarding the pace of housing and population growth, please see Master Response – Housing and Population.
Response to comment R-26-COVER-11. Regarding the proposed alternative of reducing enrollment, please see response to comment I-5-46. Regarding the proposal to house a higher percentage of students, please see response to comment R-26-COVER-4.

Response to comment R-26-COVER-12. Please see response to comment A-10-1.

Response to comment R-26-COVER-13. The RDEIR’s traffic and parking analyses account for the on-campus population. The traffic analysis provides a trip generation rate for on-campus housing. The LRDP, moreover, provides sufficient parking for on-campus residents.

Response to comment R-26-COVER-14. The RDEIR identifies a residential permit program as effective and appropriate mitigation for parking impacts in Isla Vista. The RDEIR also acknowledges past difficulties in enacting such a program. See RDEIR at 4.13-162 through 163.

Response to comment R-26-COVER-15. Tables 4.13-48 and -49 provide data on the projected volume and volume/capacity ratios at impacted roadways and intersections, thus providing specificity as to the magnitude of traffic degradation. All projects undertaken pursuant to the LRDP will be subject to project-level environmental review.

Response to comment R-26-COVER-16. The analysis in Impact TRAFFIC-7 concludes that the new bicycle connections between the Campus and Isla Vista would reduce impacts in Isla Vista to a less than significant level. That discussion, moreover, states that traffic delays would be taken into account when determining whether to install signals. Specific mitigation and traffic controls would be designed as part of project-level environmental review of specific developments.

Response to comment R-26-COVER-17. The LRDP proposes to provide sufficient on-campus housing to accommodate all enrollment and faculty/staff growth. Thus, as the DEIR states, the UCSB Police Department will have primary responsibility for the increased demand for law enforcement services attributable to the LRDP.

Response to comment R-26-COVER-18. The DEIR acknowledges that the Sheriff’s Department assists the UCSB Police Department. Such assistance may increase with growth under the LRDP. However, there is no substantial evidence that such increase would lead to a need for new or expanded facilities for the Sheriff’s Department; the increase would not, therefore, cause a significant adverse impact on the physical environment.

Response to comment R-26-COVER-19. The relative contributions of the Sheriff’s Department and the University to the staffing of the Isla Vista Foot Patrol do not constitute impacts on the physical environment.

Response to comment R-26-COVER-20. Pursuant to CEQA, the DEIR analyzes and mitigates the potential impacts to the physical environment associated with the expansion of Fire Department facilities required by growth under the LRDP. Mitigation Measure PUB-3A therefore commits the University to either pay a proportionate share of the costs of mitigating impacts associated with such construction or to provide land for such expansion. If the “proportionate share” option is implemented University will therefore pay an amount relative to its responsibility for the expansion. It will, as the commenter suggests, pay the part of the mitigation costs related to providing fire services for the campus population. The actual costs of expanding facilities and providing fire protection services are not relevant to this analysis under CEQA; please see Master Response – Fiscal Impacts.

Response to comment R-26-COVER-21. While Campus population added under the 2010 LRDP may make some use of County libraries, the University system will meet most needs. Any additional demand on
the County system will not be great enough to require the construction of new or expanded facilities, and therefore will a less than significant impact on the physical environment.

**Response to comment R-26-COVER-22.** Section 4.7 of the DEIR concludes that with the application of identified mitigation, the LRDP’s impacts related to runoff would be less than significant. No further mitigation is required.

**Response to comment R-26-COVER-23.**

A. The RDEIR determines that development under the LRDP will have a less than significant impact related to groundwater pumping; no mitigation is required. RDEIR, p. 4.14-33.

Regarding population growth and cumulative demand, please see Master Response – Water Supply section V.E.

B. Please see Master Response – Water Supply, section VI.

**Response to comment R-26-COVER-24.** The RDEIR acknowledges that NPDES permits are in the jurisdiction and control of other agencies, and therefore concludes that the LRDP’s impact related to waste water treatment capacity would be significant and unavoidable.

**Response to comment R-26-COVER-25.** Each of the EIR’s individual analyses of impacts determined to be less than significant explains the facts and reasoning supporting its conclusion.

**Response to Cover Letter. A.** The RDEIR determines that development under the LRDP will have a less than significant impact related to groundwater pumping; no mitigation is required. RDEIR, p. 4.14-33. Regarding population growth and cumulative demand, please see Master Response – Water Supply section V.E.

B. Please see Master Response – Water Supply, section VI.

1.0 Introduction and Summary

**Response to Comment R-26-Intro-1.** The text on RDEIR page 10.3 was meant to assure the reader that he or she did not need to re-submit comments on the unchanged portion of the DEIR, and that the University would respond to those earlier comments.

With regard to comments on the RDEIR, however, each section of the RDEIR entirely replaces the corresponding DEIR section. Paragraphs or statements in the DEIR that were not reproduced in the RDEIR have been deleted. For instance, using the example cited by the commenter, RDEIR Section 4.13, Transportation and Circulation entirely replaces DEIR Section 4.13. Accordingly, as authorized by State CEQA Guidelines Section 15088.5(f)(2), the University will respond to comments on RDEIR Sections 1.0, 4.2, 4.10, 4.13, 4.14 and 4.15, but not to comments on the corresponding superseded DEIR sections. The first paragraph of the County’s March 30, 2009 cover letter expressly contemplates this approach.

In addition, because the deleted DEIR sections are no longer relevant, they will not be relied on by The Regents in deciding whether to approve the proposed LRDP.

**Response to Comment R-26-Intro-2.** The excerpts from EIR Section 4.8 that are cited by the commenter explain the role the Ocean Road Housing plays in the context of the LRDP and the objectives therein. Further discussion of Ocean Road Housing is found throughout the EIR.
The University issued a Notice of Preparation of an EIR for the Ocean Road Project, but then suspended work on that project-level environmental review pending completion of the LRDP EIR. The Ocean Road Housing is included in the envelope of the 2010 LRDP and the LRDP EIR and, when developed, will be considered to be an increment of growth under the 2010 LRDP. Following certification of the EIR and approval of the 2010 LRDP, the University will resume project-level environmental review of the Ocean Road Housing Project and will respond to any comments on the project at that time.

Response to Comment R-26-Intro-3. Please see response to comment R-26-INTRO-1.

Response to Comment R-26-Intro-4. Comment noted.

Response to Comment R-26-Intro-5. A. This EIR describes the existing physical conditions at the time the NOP was issued, determines the significance of impacts due to proposed changes from existing conditions, and identifies feasible mitigation measures to lessen or avoid the significant impacts of the proposed 2010 LRDP. If approved by The Regents, the 2010 LRDP will replace the 1990 LRDP. The suggestion to relocate the main UCSB entrance is noted.

B. Like the proposed 2010 LRDP, the current, 1990 LRDP is a building and infrastructure program to accommodate campus enrollment. The 1990 LRDP was designed to accommodate approximately 20,000 students. In any given school year, the number enrolled is subject to normal fluctuations, especially during Fall quarter, due to factors such as the rate of acceptances of offers of admission, but construction of new buildings and infrastructure to accommodate enrollment increases (such as the proposed physical changes to accommodate 25,000 students proposed in the 2010 LRDP) requires additional environmental review.

4.2 Air Quality

Response to Comment R-26-AQ-1. The Air Quality Section was recirculated along with the Transportation Section, and contains revised analyses of air quality impacts based on the adjustments to the traffic analysis. Air quality impacts related to indirect, regional growth are accounted for based on SBCAG population projections.

Response to Comment R-26-AQ-2. A. Please see response to comment R-19-9b.

B. Regarding the EIR’s determination of the significance of the LRDP’s contribution to greenhouse gas (GHG) emissions, please see RDEIR page 4.2-61. The Santa Barbara County APCD has not yet adopted thresholds for GHG emissions, and other than the AB 32 requirement to reduce GHG emissions to 1990 levels by 2020 (which is estimated to be equivalent to a 30% reduction from “business as usual”).

C. GHG emissions are estimated and projected in RDEIR Section 4.2. See pages 4.2-57 and 4.2-59.

D. Please see responses to comments R-19-9b and R-26-2a through -2c. Campus baseline emissions are stated in RDEIR Table 4.2-18, page 4.2-57.

E. Please see response to comment R-19-10.

Response to Comment R-26-AQ-3. The EIR used the best available information at the time of the Notice of Preparation, and as updated by the RDEIR for the sections recirculated therein.

Response to Comment R-26-AQ-4. The non-attainment status of the air basin for ozone and PM10 is discussed in Impact AIR-5 (EIR, p. 4.2-38).

4.10 Population and Housing
Response to Comment R-26-POP-1. Please see response to R-26-INTRO-5.

Response to Comment R-26-POP-2. Table A.1 of the LRDP shows the average headcount over three quarters for 20,000 students, whereas the 2007-08 Campus Profile shows the actual enrollment during the Fall quarter. Because enrollment is lower during the second two quarters of an academic year than during the Fall quarter, an average number of students from past academic years is a more accurate estimate of campus enrollment. Please see RDEIR Table 4.10-1 (Student Enrollment) on page 4.10-2. The commenter is correct that some students, faculty and staff live on campus (campus population), and some students, faculty and staff do not live on campus (campus-affiliated).

This EIR presents the program of development for net new campus growth under the proposed 2010 LRDP. Please see DEIR Section 3.0, Project Description, and RDEIR Section 4.10, Population and Housing, for a thorough discussion.

Response to Comment R-26-POP-3. The text on RDEIR page 4.10-4 has been revised as follows:

In any given year, more than 50% of the academic and non-academic headcount reported in Table 4.10-2 are students, including student assistants to faculty, and student employees in Professional and Support Staff categories.

The text on RDEIR page 4.10-5 has been revised as follows:

Students. The UC Santa Barbara Community Housing Office tracks the geographic distribution of students each year. This data is reported in the Office of Institutional Research and UC Santa Barbara Office of Planning’s annual Campus Profile. A selection of data is presented in Table 4.10-6.

The text on RDEIR page 4.10-9 has been revised as follows:

The Santa Barbara County Association of Governments (SBCAG) provides population and household projections for the region. These projections are shown in Table 4.10-10.

The text on RDEIR page 4.10-10 has been revised as follows:

The University hosts many types of visitors. Visitors come to the University for campus tours and open houses (e.g. Parent’s Weekend), graduation ceremonies, summer conferences, and athletic events. Visitor counts or estimates are available for most of these events. Table 4.10-11 outlines the current visitor number and mix based on the UC Santa Barbara Economic Forecast Study.

The text on RDEIR page 4.10-11 has been revised as follows:

For campus events, the number of visitors differs widely according to the type of events. Graduation ceremonies occur twice per year (typically over a weekend). The major open house occurs once per year, with a large influx of visitors (mostly parents) during that time. The major ongoing events are the campus tours, which occur regularly, with multiple groups of ten or fewer people visiting throughout a day (see Table 4.10-12).

The text on RDEIR page 4.10-12 has been revised as follows:

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A survey of visitors to coastal recreation areas via campus streets and paths was performed in preparation for the Ellwood-Devereux project. The results of the survey for the months of September and October 2001 are presented in Table 4.10-13.

The text on RDEIR page 4.10-14 has been revised as follows:

**Apartments.** Campus apartments are available for families, upper-division students, and a small number of faculty. As shown in Table 4.10-15, […]

The text on RDEIR page 4.10-15 has been revised as follows:

**Family Housing.** As noted in Table 4.10-15 and in the preceding paragraph, there are 553 family units on campus.


Response to Comment R-26-POP-5. RDEIR Appendix 4.13-3 (pages 11-17) contains the documentation of the trip generation for the LRDP. As stated, the trip generation was based on a combination of traffic count data at existing University uses and travel survey data and validated to existing conditions as follows:

The trip generation rates based on travel survey data for students and faculty/staff were adjusted (increased) so that the trip generation of existing uses matched actual traffic counts at the campus gateways. Increasing the trip generation rates was necessary to account for visitor trips to/from campus (visitors are included in the trip generation rates for faculty/staff). In addition, although many students and faculty/staff typically commute to campus in a mode other than a SOV, they may occasionally drive to campus, which was not reflected in the travel survey results. The final trip generation rates applied to the LRDP traffic study produced existing forecasts that matched existing traffic counts on campus.

Response to Comment R-26-POP-6. The Santa Catalina Residence Hall is not jurisdictionally within Isla Vista, since it is campus property. (Please see LRDP Figure B.6.)

Response to Comment R-26-POP-7. The intent of Table 4.10-8 is to show the relative percentages of faculty and staff owners and renters in the communities that make up the study area. This information is from the UC Santa Barbara Faculty and Staff Housing Survey Summary Report published by the Office of Institutional Research and Planning, which gives the overall sample sizes for the faculty and staff population (1,248 owners, 940 renters, at a total of 2,237). The report does not provide a number for each location.

Response to Comment R-26-POP-8. The “Santa Barbara unincorporated” category in Table 4.10-10 consists of all unincorporated areas within the South Coast sub-region of Santa Barbara County. Table 4.10-10 will be clarified as follows:

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Table 4.10-10.
SBCAG Regional Growth Projections 2005-2040

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>2005</th>
<th>2010</th>
<th>2015</th>
<th>2020</th>
<th>2025</th>
<th>2030</th>
<th>2035</th>
<th>2040</th>
<th>Annual Average Rate of Growth</th>
</tr>
</thead>
<tbody>
<tr>
<td>County Total¹</td>
<td>417,500</td>
<td>430,200</td>
<td>444,900</td>
<td>459,600</td>
<td>473,400</td>
<td>481,400</td>
<td>487,000</td>
<td>492,800</td>
<td>0.47%</td>
</tr>
<tr>
<td>County Unincorporated</td>
<td>135,900</td>
<td>138,300</td>
<td>140,700</td>
<td>143,000</td>
<td>144,900</td>
<td>146,800</td>
<td>148,900</td>
<td>151,200</td>
<td>0.30%</td>
</tr>
<tr>
<td>South Coast Subregion</td>
<td>204,700</td>
<td>205,800</td>
<td>208,500</td>
<td>211,300</td>
<td>213,600</td>
<td>215,700</td>
<td>216,300</td>
<td>216,900</td>
<td>0.17%</td>
</tr>
<tr>
<td>Goleta</td>
<td>31,000</td>
<td>31,700</td>
<td>33,100</td>
<td>34,500</td>
<td>35,900</td>
<td>37,300</td>
<td>37,300</td>
<td>37,300</td>
<td>0.53%</td>
</tr>
<tr>
<td>Santa Barbara Unincorporated</td>
<td>64,400</td>
<td>64,600</td>
<td>64,800</td>
<td>65,000</td>
<td>65,200</td>
<td>65,400</td>
<td>65,500</td>
<td>65,800</td>
<td>0.10%</td>
</tr>
<tr>
<td>Santa Barbara (City)</td>
<td>89,800</td>
<td>90,000</td>
<td>91,000</td>
<td>92,000</td>
<td>92,400</td>
<td>92,800</td>
<td>92,800</td>
<td>93,000</td>
<td>0.10%</td>
</tr>
</tbody>
</table>

Notes:
1. The Department of Finance projections for the county are inconsistent with the projections provided by SBCAG (approximately 440,000 for 2010, 460,000 for 2020 and 465,000 for 2030). Source: SBCAG Regional Growth Forecast 2005-2040.
2. The South Coast Subregion includes unincorporated areas of Santa Barbara County, unincorporated areas of Carpinteria Valley, and the cities of Goleta, Santa Barbara, and Carpinteria.

Response to Comment R-26-POP-9. The EIR used the best available information at the time of the Notice of Preparation, and as updated by the RDEIR for the sections recirculated therein.

Response to Comment R-26-POP-10. RDEIR Section 4.10 acknowledges the built-out nature of the South Coast region and ultimately determines that the cumulative impact to housing is significant. Also, please note that the EIR uses population figures from SBCAG to be consistent with the population and household characteristics of the region. Please see Impact POP-4.

Response to Comment R-26-POP-11. As disclosed on RDEIR page 4.10-19, a draft RHNA was being prepared at the time of environmental review; however, the most current RHNA available at the time the NOP was the version published in December 2002. The 2007 RHNA, published June 19, 2008, shows a new housing need determination of 11,600 (2007-2014 RHNA, p. 4), and this was acknowledged in the RDEIR at page 4.10-20, including the fact that the County claims some amount of credit for the contribution of campus housing to the RHNA target. This does not change the conclusions in the EIR. The cumulative impact to housing has been determined to be significant and unavoidable, because of the lag time to produce new housing for people newly seeking housing in the region due to the proposed LRDP; that conclusion remains the same. Please see RDEIR Impact POP-4 for more information.

Response to Comment R-26-POP-12. Pertinent housing goals and policies from the County’s General Plan Housing Element and the proposed Isla Vista Master Plan are reproduced in the RDEIR on pages 4.10-23 through -25.

Response to Comment R-26-POP-13. Please see response to comment A-12-2 regarding ASF versus GSF.
There is no substantial evidence that the buildings proposed to be constructed under the LRDP will not be used for the purposes specified in the LRDP. In addition, further environmental review will be performed for the specific development projects implementing the LRDP.

Response to Comment R-26-POP-14. Please see the Master Response – Housing and Population. Also, please see response to comment A-12-1 regarding the four-year lag in housing provision. The University’s NOID submittal to the Coastal Commission will include all of the information that the Commission requires.

Response to Comment R-26-POP-15. As discussed in RDEIR Impact POP-1, buildout of the 2010 LRDP would allow for an increased enrollment of approximately 5,000 students, and would create up to 5,443 new bedspaces and 239 new student family units. Hence, the proposed 2010 LRDP campus housing program would accommodate more than the estimated increase in students. The same is true for faculty and staff, with a proposed increase of 1,700 over the life of the plan, and 1,874 new units provided at buildout. Therefore, the 2010 LRDP will house all of the new university affiliate population, which accounts for the direct growth. That is why Impact POP-1 was determined to be less than significant. The RDEIR also discloses that the 2010 LRDP will create a demand for housing off campus. Please see RDEIR Impacts POP-3 and POP-4.

Response to Comment R-26-POP-16. The commenter’s summary of RDEIR Impact POP-2 is inaccurate. Impact POP-2 concludes that the proposed off campus roadway improvements would mitigate the traffic impacts of the proposed 2010 LRDP, but that those roadway improvements would not induce substantial population growth. “Improvement of traffic flow in this area is consistent with County goals expressed in the Isla Vista Master Plan, as well as the County General Plan … and would not induce growth in a manner that is not anticipated by these plans. Most importantly, the project would not extend road infrastructure to a previously not served, unincorporated County or city area. The growth-inducing potential of these street improvements is, therefore, considered low…” and no mitigation is required (RDEIR, p. 4.10-30).

Indirect and induced growth due to the proposed 2010 LRDP are analyzed in RDEIR Impacts POP-3 and POP-4, which were determined to be significant and unavoidable.

Response to Comment R-26-POP-17. The RDEIR discloses that this impact would be significant and unavoidable because housing opportunities would not keep pace with University enrollment and/or employment increases. Nevertheless, the EIR includes feasible mitigation (Mitigation Measure POP-3A), which will reduce the impact, but not to a less-than-significant level. Mitigation Measure POP-3A is intended to create new housing within four years of additional LRDP demand, requires tracking demand and housing creation, and constitutes a commitment to provide new housing within a feasible time frame given the identified constraints. These constraints include funding (see RDEIR p. 4.10-15), land use constraints at individual sites, and compliance with CEQA. University housing cannot be phased closer to the time of need because of these constraints, nor can it be required in advance of projected need because University housing must be self supporting.

Regarding Impact POP-1, please see response to comment R-26-POP-15. Regarding future campus NOID submittals, please see response to comment R-26-POP-14. Regarding separate consideration of impacts to Isla Vista, this subject is discussed throughout the EIR. For example, parking impacts in Isla Vista are analyzed in RDEIR Impact TRAFFIC-10. Please see response to comment A-14-2 regarding Isla Vista recreation impacts.

Response to Comment R-26-POP-18. The proposed 2010 LRDP will house all of the new campus affiliates that the LRDP would accommodate. The LRDP does not involve creating more housing than is required by the proposed plan. Housing all current and future students and employees on campus is both infeasible and unrealistic. The University has neither the financial resources nor the physical space to accomplish such a goal.
4.13 Transportation

Response to Comment R-26-TRANS-1. The comments summarized in the commenter’s introduction are addressed below.

Response to Comment R-26-TRANS-2. Comment noted.

Response to Comment R-26-TRANS-3. Both the LRDP and EIR acknowledge that Isla Vista is within the jurisdiction of the County.

Response to Comment R-26-TRANS-4. Please see response to comment A-14-8. In addition, UC Santa Barbara hosted a bicycle design charrette in May 2009 with campus staff and members of the community, including the County of Santa Barbara, to identify bicycle and pedestrian improvements with the Ocean Road Housing project. The Ocean Road Housing project would enhance bicycle connections between the campus and Isla Vista by increasing the number of connections between Isla Vista and Main Campus. The University is committed to working with agencies and local jurisdictions to ensure a complete and comprehensive study is conducted for the LRDP.

Response to Comment R-26-TRANS-5. The traffic counts were performed as a part of preparing the DEIR. Even though the DEIR Transportation and Circulation Section was recirculated to address a number of technical issues raised in comments on the DEIR, there is no substantial evidence that there has been a significant change in conditions between the DEIR and the RDEIR such that new traffic counts are warranted.

With regard to analysis of bicycle and pedestrian circulation, please see response to comment R-26-TRANS-4.

Response to Comment R-26-TRANS-6. Study intersections in which directional traffic flows substantially vary between morning and evening commute periods, such as freeway on- and off-ramps and campus gateways, were analyzed during both the a.m. and p.m. peak hours. As shown in the graphs on RDEIR page 4.13-4, traffic volumes within the study area are substantially higher during the p.m. peak hour than during the a.m. peak hour. For those intersections analyzed under a.m. peak hour conditions, no additional traffic impacts or mitigation measures were identified beyond those already identified in the p.m. peak hour analysis. Please see response to comment O-20-4 for more information.

Response to Comment R-26-TRANS-7. The EIR analyzed 18 intersections within Isla Vista (including intersections along El Colegio Road) that are most likely to be impacted by the LRDP. As stated in the recirculated Transportation Section (p. 4.13-4), “the study intersections and roadway segments are presented below. These study locations were selected based on area plans, prior studies by local governments, and consultation with planning staff and transportation engineers as locations that could be potentially impacted by campus growth proposed under the 2008 LRDP.” Please see pages 4.13-5 to 4.13-8.

Response to Comment R-26-TRANS-8. The intersections were included in the analysis.

Response to Comment R-26-TRANS-9. A complete list of study facilities is provided on RDEIR pages 4.13-5 through -10.


Response to Comment R-26-TRANS-12. Please see response to comment R-26-TRANS-4.

Response to Comment R-26-TRANS-14. The effects of bicycle traffic and LRDP changes to the bicycle network are discussed on RDEIR page 4.13-93. As stated on page 4.13-94, based on bicycle volume measurements, signals for pedestrian and bicycle traffic may be warranted. Please see the discussion of RDEIR Impact TRAFFIC-7

Response to Comment R-26-TRANS-15. The proposed 2010 LRDP will provide housing for all new students, faculty and staff. Parking will be provided at the housing complexes to accommodate resident student, faculty, and staff. Due to the close proximity of the new housing uses to the campus, students, faculty, and staff living in these new units will not be permitted to drive to campus. Therefore, additional parking, beyond that being provided as part of the housing complexes, is not needed on the main campus to accommodate the growth proposed under the LRDP. In addition, the existing campus parking supply exceeds, demand as shown in RDEIR Table 4.13-13.

RDEIR Appendix 4.13-4 contains a parking study conducted in Isla Vista, which includes parking data collected for the Isla Vista area. The parking study describes general trends in parking demand and occupancy within the Isla Vista Community, and estimates the numbers of students, faculty and staff parking in Isla Vista instead of on the UCSB campus. Parking inventory and percent utilization throughout the day was documented. RDEIR Impact TRAFFIC-10 identifies parking in Isla Vista as a significant impact, and Mitigation Measure TRAFFIC-10A requires the University to contribute its fair share to a permit parking program to alleviate this impact. Because the permit parking program would require approval from agencies outside of the University’s control, the impact was identified as significant and unavoidable.

The suggestion to provide free parking on campus would not support the University’s efforts to reduce SOV trips. Based on parking occupancy surveys, parking is available on campus and parking on campus is more convenient than parking in Isla Vista if affiliates already have an UCSB parking permit.


Response to Comment R-26-TRANS-17. Please see response to comment R-26-TRANS-15.


Response to Comment R-26-TRANS-22. The parking surveys of on-campus lots included both the a.m. and p.m. peak hours. As shown in the graph on RDEIR page 4.13-32, parking demand is highest during the afternoon between 2:00 – 3:00 p.m. Parking demand decreases in the early morning and late afternoon hours on-campus. Therefore, the RDEIR tables comparing parking supply to demand focus on this 2:00-3:00 p.m. peak hour to show the worst-case parking scenario for campus.

Response to Comment R-26-TRANS-23. Please see response to comment R-26-TRANS-22.

Response to Comment R-26-TRANS-24. The level of detail requested by the commenter is not necessary in RDEIR Table 4.13-8. (See State CEQA Guidelines Section 15147 [the information in the EIR “shall include summarized technical data;” placement of highly technical data in the body of the EIR “should be
avoided[4]. In any case, putting this information in the EIR would not change the outcome of the impacts analysis.

The information in RDEIR Table 4.13-8 comes from a traffic study prepared by transportation experts Fehr & Peers which is found in RDEIR Appendix 4.13, and was prepared according to ICU methodology and industry standards. See State CEQA Guidelines Section 15147 (the information in the EIR “shall include summarized technical data;” putting highly technical data in the body of the EIR “should be avoided”).

Response to Comment R-26-TRANS-25. Students living off-campus and outside of Isla Vista that had purchased an on-campus parking permit were not asked if they parked in Isla Vista, because it is reasonable to assume that they park on campus. The 288 students who responded that they do not have an on-campus permit were asked if they parked in Isla Vista. Based on the results of past parking occupancy surveys, the University has learned that parking is available on campus and parking on campus is more convenient than parking in Isla Vista if one already has a UCSB parking permit. For example, the newest parking structure on campus, Structure 22, was approximately 20 percent occupied during the Spring 2007 parking survey. This structure is located on the west side of campus and in close proximity to the Isla Vista Community.

Response to Comment R-26-TRANS-26. Please see response to comment A-17-TRANS-29.

Response to Comment R-26-TRANS-27. The parking survey data for Goleta Beach was collected by transportation experts Fehr & Peers using standard parking survey techniques. The parking study describes general trends in parking demand and occupancy, and estimates the number of students, faculty, and staff parking in Goleta Beach instead of on the UCSB campus. See State CEQA Guidelines Section 15147 (the information in the EIR “shall include summarized technical data;” putting highly technical data in the body of the EIR “should be avoided”).


Response to Comment R-26-TRANS-29. Please see response to comment R-26-TRANS-15.

Response to Comment R-26-TRANS-30. The University performed surveys of travel modes used by students, faculty and staff in 2006 and 2002 (RDEIR, pp. 4.13-46 to 4.13-48). The effectiveness of the TDM measures will be quantified through monitoring, as required in Mitigation Measure TRAFFIC-1A(2), in order to achieve the performance standard in Mitigation Measure TRAFFIC-1A(1) of a 10% reduction in vehicle trips to and from campus. The University will collect traffic counts at the intersections and roadways analyzed in the EIR traffic model, including campus gateways. The TDM program is only one of several proposed mitigation measures. Physical roadway improvement mitigation measures have been identified based on the conservative (worst case) assumption that no traffic volume reduction would be achieved from TDM measures. The mitigation monitoring program will be used to identify the appropriate timing for the implementation of required mitigation measures.

Response to Comment R-26-TRANS-31. The EIR relied on the most recent available travel survey data, which was conducted in 2002 for students. More recent data (from 2006) were available for faculty and staff. Because the amount of University housing close to campus has increased since 2002, the survey may overestimate vehicle use by students.

Response to Comment R-26-TRANS-32. Santa Barbara County’s traffic impact significance criteria were used in this EIR’s traffic impact analysis. Please see RDEIR, pp. 4.13-57 to -59.

Response to Comment R-26-TRANS-33. LRDP Policy TRANS-8 provides that Mesa Road may be widened west of Ocean Road to accommodate bike lanes and pedestrian paths. Mesa Road is an on-campus
roadway and under the University’s jurisdiction. If it is proposed for widening, appropriate environmental review would be required.

Response to Comment R-26-TRANS-34. As noted in the comment, vehicular roadway connections between Isla Vista and the Main Campus are not proposed as part of the LRDP; however, they were explored as a potential alternative to alleviate traffic congestion along El Colegio Road. The El Colegio widening project will improve traffic operations along El Colegio Road, and the roadway connections are not needed to meet County LOS standards. The discussion of the potential connections and LOS results are useful information to include in the LRDP and will remain part of the document.


Response to Comment R-26-TRANS-36. The text on page 4.13-70 has been amended as follows:

While the Isla Vista Master Plan has been approved by the County, it has not been submitted to or approved by the California Coastal Commission. Thus, inclusion of the development contemplated as part of the Isla Vista Master Plan in the LRDP cumulative traffic analysis projects a worst-case traffic scenario.

Response to Comment R-26-TRANS-37. Study intersections in which directional traffic flows substantially vary between morning and evening commute periods, such as freeway on- and off-ramps and campus gateways, were analyzed during both the a.m. and p.m. peak hours. As shown in the graphs on RDEIR page 4.13-4, traffic volumes within the study area are substantially higher during the p.m. peak hour than during the a.m. peak hour. For those intersections analyzed under a.m. peak hour conditions, no additional traffic impacts or mitigation measures were identified beyond those already identified in the p.m. peak hour analysis.

Based on output from the travel demand forecasting model, locations with minimal traffic volume changes (less than 2 percent) were not analyzed. Therefore, study locations further from campus were not included in the impact analysis.

Response to Comment R-26-TRANS-38. As stated in the RDEIR Transportation and Circulation Section, page 4.13-66, some trips internal to University uses would still require use of non-campus roadways (e.g., a vehicle-trip between the West Campus and Main Campus would travel on El Colegio Road):

The West Campus is estimated to generate approximately 2,200 daily, 170 a.m. peak hour, and 190 p.m. peak hour vehicle-trips, and Storke Campus is estimated to generate approximately 6,900 daily, 610 a.m. peak hour, and 550 p.m. peak hour vehicle-trips. Students and faculty/staff residing in the proposed West Campus and Storke Campus housing were also included in the student/faculty/staff FTE increase on the Main Campus. To account for the internalization of trips between the Main Campus, West Campus, and Storke Campus, 25 percent internalization was accounted for in the following uses listed in Tables 4.13-31 and 4.13-32: faculty/staff units on the West Campus, and student apartments and faculty/staff housing on Storke Campus. The 25 percent internalization for these uses accounts for approximately 7 percent of vehicle-trips generated by the LRDP (e.g., 157 out of 2,327 trips during the p.m. peak hour). These vehicles would use non-campus roadways, such as El Colegio Road, to travel between the Main Campus, West Campus, and Storke Campus.

The vehicle-trips that would use non-campus roadways are included in the fair-share calculations presented in the RDEIR.

Response to Comment R-26-TRANS-39. RDEIR Appendix 4.13-3 contains a select zone model plot reflecting the distribution of project trips for the LRDP. In addition, traffic volume figures are presented in the RDEIR Transportation and Circulation Section documenting traffic volumes with and without the LRDP.
Response to Comment R-26-TRANS-40. The effects of bicycle and pedestrian travel on study intersections in Isla Vista were evaluated. RDEIR Tables 4.13-9 and 4.13-42 present the findings of bicycle and pedestrian warrant analysis. In addition, UC Santa Barbara hosted a bicycle design charrette in May 2009 with campus staff and members of the community, including the County of Santa Barbara, to identify bicycle and pedestrian improvements with the Ocean Road Housing project. The Ocean Road Housing project would enhance bicycle connections between the campus and Isla Vista. Fehr & Peers submitted a Draft Report to the University in June 2009 documenting the recommended improvements resulting from the charrette. The University is committed to working with agencies and local jurisdictions to ensure a complete and comprehensive study is conducted for the LRDP.

Response to Comment R-26-TRANS-41:

At intersection #15, the southbound left-turn volume increases from 650 vehicles under 2025 No Project conditions to 740 vehicles under 2025 Plus Project conditions. For intersection #34, westbound left-turn and through volumes also would increase, and traffic levels for intersections ## 37, 38 and 40 are expected to improve from Existing and 2025 No Project conditions to 2025 Plus Project conditions. Traffic volumes are shown in RDEIR Figures 4.13-2B, 4.13-8B, and 4.13-9B.

Response to Comment R-26-TRANS-42:

Comment noted. Table 3.0-9 has been revised to provide a simplified version of the housing summary.

Response to Comment R-26-TRANS-43:

As described in RDEIR Section 4.13.2.2 (page 4.13-75), traffic forecasts for the LRDP impact analysis were developed without the planned regional roadway improvements, such as the widening of U.S. 101 or planned U.S. 101 overcrossings in the City of Goleta, because the funding of these improvements is uncertain (i.e., full funding has not been identified). This conservative approach (worst-case scenario) was applied to the LOS analysis to ensure that the traffic impacts of the LRDP are fully mitigated, and that UC Santa Barbara will contribute its fair-share towards planned roadway improvements in the campus vicinity. The commenter's suggestion that the EIR should assume all planned roadway improvements are in place would have the contrary effect of reducing the traffic impacts identified in the EIR and reducing the number of proposed mitigation measures.

Traffic operations with future roadway improvements were analyzed as part of the mitigation measures for the LRDP for the purpose of determining impacts at buildout. RDEIR Figure 4.13-16 shows the future improvements assumed in place under the mitigation scenario. The LRDP’s proposed mitigation measures include planned regional roadway improvements, and identify the University’s fair-share contribution towards funding these improvements. Traffic forecasts were produced with the refined travel demand model as discussed in Appendix 4.13-3. The LOS results with the future roadway improvements in place are presented under RDEIR Impacts TRAFFIC-1, TRAFFIC-2, TRAFFIC-4, TRAFFIC-5, and TRAFFIC-6.

Response to Comment R-26-TRANS-44. Please see response to comment R-26-TRANS-43.

Response to Comment R-26-TRANS-45. Improvements at the Mesa Road/Los Carneros Road intersection are identified as part of Mitigation Measure TRAFFIC-1A. These improvements will improve the intersection LOS as the commenter states.

Response to Comment R-26-TRANS-46. The lane configurations and traffic controls assumed in place at the two intersections cited in the comment were reviewed. The lane geometry depicted for the Fairview/101 Northbound Ramp intersection is consistent with existing conditions, and the reported LOS is accurate. The
Response to Comment R-26-TRANS-47. RDEIR Figure 4.13-16 displays the roadways and intersections in which mitigation measures were provided. For County intersections, RDEIR page 4.13-136 contains a description of improvements proposed as mitigation measures. County roadway improvements are included on RDEIR pages 4.13-151 and 4.13-152.

Response to Comment R-26-TRANS-48. Please see RDEIR Section 4.13 and Table 4.13-52, which are based on an updated the transportation study and provide additional information regarding the University’s fair-share of future improvements.

Response to Comment R-26-TRANS-49. The traffic count data are provided in the RDEIR Transportation and Circulation Section 4.13, Appendix 4.13-1. ICU assumptions relied on in the analysis are presented on page 4.13-13. As noted on page 4.13-12, the ICU methodology corresponds to the intersection LOS based on the thresholds in Table 4.13-3.

Response to Comment R-26-TRANS-50. The trip generation and distribution for the LRDP analysis are provided in RDEIR Appendix 4.13-3.

Response to Comment R-26-TRANS-51. RDEIR Appendix 4.13-3 (pages 11-17) contains the documentation of the trip generation for the LRDP. Traffic counts were collected at UC Santa Barbara housing complexes to determine the trip generation rates.

Response to Comment R-26-TRANS-52. The traffic impact study did not analyze phase-specific impacts because the LRDP is assumed to build out at a more or less steady annual rate and not in phases. Cumulative impacts at buildout of the LRDP were analyzed as appropriate for a programmatic EIR. Individual project-specific impacts will be identified in project-specific traffic impact studies at the time that projects implementing the LRDP are proposed.

Response to Comment R-26-TRANS-53. Please see response to comment R-26-TRANS-52. Ocean Road Housing has been incorporated into the LRDP effort for programmatic purposes, but will undergo project-specific environmental review at the time of project proposal.

Response to Comment R-26-TRANS-54. RDEIR Appendix 4.13-3 contains the model development report and the assumptions used in the LRDP impact analysis to forecast future traffic volumes.

Response to Comment R-26-TRANS-55. RDEIR Appendix 4.13-3 contains the model development report and the assumptions used in the LRDP impact analysis to forecast future traffic volumes, including trip generation and a.m. peak hour forecasts.

Response to Comment R-26-TRANS-56. Please see response to comment R-26-TRANS-57.

Response to Comment R-26-TRANS-57. Detailed land use assumptions are contained in RDEIR Appendix 4.13-3. RDEIR Table 4.13-36 (p. 4.13-74) shows the major land use categories that were used in the analysis. No pertinent land use categories were omitted.

Response to Comment R-26-TRANS-58. Please see response to comment R-26-TRANS-43.

Response to Comment R-26-TRANS-59. Please see response to comment R-26-TRANS-43.
Response to Comment R-26-TRANS-60. Please see response to comment R-18-11.

Response to Comment R-26-TRANS-61. Please see RDEIR subsection 4.2.3 for a discussion of AB 32, SB375, and other air quality legislations and enactments, and how they relate to the LRDP.

Response to Comment R-26-TRANS-62. Phase 1 of the El Colegio widening project has been completed, and Phase 2 (between Storke Road and Los Carneros Road) is under construction but was not assumed in to be in place under future Year 2025 conditions. Omitting Phase 2 from the Year 2025 roadway network assumptions means only that the impacts may be overstated in the RDEIR.

Response to Comment R-26-TRANS-63. Please see response to comment R-26-TRANS-55.

Response to Comment R-26-TRANS-64. The proposed 2010 LRDP is a program of future development. It does not re-analyze unbuilt development projects that were approved under the current LRDP, but properly includes them as part of the future cumulative context because they are reasonably foreseeable future development. The future Year 2025 baseline scenario, therefore, includes the completion of the San Clemente housing project (currently occupied but under construction at the time of traffic count collection), and the Sierra Madre and North Campus housing projects. These projects have been approved, environmental documentation is completed, and would be built with or without the implementation of the proposed LRDP; therefore, they were appropriately included in the future baseline scenario. The future cumulative context also includes projected regional growth projections, which accounts for indirect growth.

Response to Comment R-26-TRANS-65. The University does not agree that the LRDP has significant impacts other than the impacts on the identified transportation facilities. The method for calculating the University’s fair share contribution to these impacted roadways is described in RDEIR page 4.13-117. Please see Master Response – Traffic Fair Share Mitigation.

Response to Comment R-26-TRANS-66. The EIR includes acknowledgement and cooperation with the City of Santa Barbara where relevant.

Response to Comment R-26-TRANS-67. There is no evidence that LRDP-related bicycle and pedestrian traffic will have significant impacts, including significant adverse physical effects on sidewalks, other than those identified in this EIR.

Response to Comment R-26-TRANS-68. As stated in RDEIR Mitigation Measure TRAFFIC-1A, the University will quantity traffic volume changes through a program of routine traffic counts. This monitoring program will be used to identify the appropriate timing for the implementation of required transportation improvements identified in the EIR.

Response to Comment R-26-TRANS-69. The effects of bicycle and pedestrian travel on study intersections in Isla Vista were evaluated. Please see RDEIR Tables 4.13-9 and 4.13-42, which present the findings of the bicycle and pedestrian warrant analysis performed for this EIR. In addition, the removal of the Pardall tunnel was identified as a significant impact. Please see response to comment I-44-8 for more information.

Response to Comment R-26-TRANS-70. Although there is no evidence that Pardall tunnel constitutes a significant historic resource, all development will be subject to the cultural resources mitigation measures identified in DEIR Section 4.4, and will be analyzed for such resources prior to any construction. Please see response to comment I-25-1.
Response to Comment R-26-TRANS-71. Comment noted.

Response to Comment R-26-TRANS-72. Please see response to comment R-26-TRANS-34.

Response to Comment R-26-TRANS-73. Please see response to comment R-26-TRANS-4.

Response to Comment R-26-TRANS-74. Roadways that would operate below LOS C in the County and below LOS D in Isla Vista due to the proposed 2010 LRDP have been identified as being significantly impacted.

Response to Comment R-26-TRANS-75. An additional east-west roadway between Mesa Road and El Colegio Road is proposed as part of the LRDP, and was analyzed in this EIR. The alignment of the east-west roadway is shown in RDEIR Figure 4.13-7.

Response to Comment R-26-TRANS-76. Please see response to comment R-26-TRANS-43.

Response to Comment R-26-TRANS-77. As shown in RDEIR Figure 4.13-1 and in Table 4.13-1, east-west roadways within the study area, including U.S. 101, were analyzed in the LRDP traffic impact analysis. The LRDP traffic model was used to identify roadways that experienced more than a two percent increase in traffic volumes with the implementation of the LRDP. Roadways that had less than a two percent increase in volume, such as Cathedral Oaks Road, were not analyzed further. Traffic mitigation measures, including fair share contributions, are identified in RDEIR Section 4.13.

Response to Comment R-26-TRANS-78. A traffic monitoring program is just one component of RDEIR Mitigation Measures TRAFFIC-1A, -2A, and -4A through -6A. Changes in traffic volumes will be measured and quantified by the University by means of annual traffic counts at campus gateways and specified intersections. The results of this monitoring program will be used to identify the appropriate timing for the implementation of any required transportation improvements, all of which are identified in the TRAFFIC Mitigation Measures. The physical roadway improvements that are identified as mitigation measures are assumed to be needed based the conservative (i.e., worst-case) assumption that no traffic volume reduction would be achieved through use of TDM. With regard to the comment about the effectiveness of TDM, please see response to comment R-26-TRANS-30.

Working with local jurisdictions and agencies is another component of the TRAFFIC Mitigation Measures, and is both reasonable and necessary because the proposed roadway improvements that would be constructed to mitigate impacts on transportation facilities are within the jurisdiction and control of these other agencies.

The proposed fair-share mitigation measure is described in more detail on RDEIR page 4.13-117. Pursuant to the TRAFFIC Mitigations, this University's fair-share contribution could be spent on one of several methods to reduce traffic impacts identified in the Mitigation Measures: alternative transportation enhancements, off-site roadway improvements by other agencies and/or the specific roadway improvements identified in this EIR and listed in the Mitigation Measures. Fair-contribution is an acceptable method of mitigating cumulative impacts. (See State CEQA Guidelines § 15130(a)(3).)

The payment of development fees is inappropriate in this case, since the University is not subject to County regulation and is not developing County property. The impact is mitigated through fair-share contributions.

For information on the measures the University will take to increase alternative transportation, please see response to comment R-4-19.

Response to Comment R-26-TRANS-79. Please see response to comment R-26-TRANS-30.
Response to Comment R-26-TRANS-80. Please see response to comment R-4-19. The effects alternative transportation strategies will have are not quantifiable at this time, since some programs have not yet been implemented, and others will be expanded, and many such measures involve other jurisdictions.

Response to Comment R-26-TRANS-81. The effectiveness of TDM measures recommended under the LRDP will be quantified through mitigation monitoring, as required by RDEIR Mitigation Measure TRAFFIC-1A(2). The University will quantify the effectiveness of TDM measures by collecting traffic counts at campus gateways. The TAP program is only one of several proposed mitigation measures. The monitoring program will be used to identify the appropriate timing for the implementation of required mitigation measures.

Response to Comment R-26-TRANS-82. Phase 1 of the El Colegio widening project has been completed, and Phase 2 is under construction. With the completion of Phase 2 of the El Colegio widening project, which will consist of four lanes, no significant impacts from the proposed 2010 LRDP would occur at these the El Colegio/Los Carneros and Storke/El Colegio intersections. The roadway widening project will accommodate future traffic volumes, consistent with the County’s transportation study conducted for the El Colegio roadway widening project.

Response to Comment R-26-TRANS-83. As shown in Figure 4.13-1 and in Table 4.13-1, east-west roadways within the study area, including U.S. 101 were analyzed in the LRDP traffic impact analysis. The LRDP traffic model was used to identify roadways that experienced more than a two percent increase in traffic volumes with the implementation of the LRDP. Roadways that had less than a two percent increase in volumes, such as Cathedral Oaks Road, were not analyzed. The RDEIR identifies improvements that will, if implemented, reduce traffic impacts at the relevant County roadways to a less than significant level. Mitigation Measure TRAFFIC-2A would commit the University to contributing its proportionate share to these improvements.

Response to Comment R-26-TRANS-84. The LRDP analyzed 20 intersections in the County of Santa Barbara, and identified impacts and mitigation measures. Vehicular roadway connections between Isla Vista and the Main Campus are not proposed as part of the LRDP. However, vehicular roadway connections were explored as a potential alternative to alleviate traffic congestion along El Colegio Road, and the resulting LOS with the connections in place for all study intersections were modeled. The El Colegio widening project will improve traffic operations along El Colegio Road and the roadway connections are not needed to meet County LOS standards. Please see response to comment R-26-TRANS-34.

Response to Comment R-26-TRANS-85. The proposed fair-share mitigation measure is described in more detail on RDEIR page 4.13-117. As part of the methodology for calculating the fair share, “[e]ngineering estimates will be made for the costs of improvements necessary to mitigate the impact based on each jurisdiction’s adopted Transportation Improvement Program.”

Response to Comment R-26-TRANS-86. Please see response to comment R-256-TRANS-78. An analysis of the traffic impacts of the proposed 2010 LRDP, both before and after mitigation, is provided in RDEIR Section 4.13, Transportation and Circulation. (See, e.g., RDEIR Table 4.13-41.)

Response to Comment R-26-TRANS-87. Please see response to comment R-26-TRANS-64.

Response to Comment R-26-TRANS-88. Please see responses to comments R-26-TRANS-65 and -78.

Response to Comment R-26-TRANS-89. Please see response to comment R-26-TRANS-43.
Response to Comment R-26-TRANS-90. The intersections that would be improved as part of the mitigation of significant traffic impacts are identified in the discussions of RDEIR Impacts TRAFFIC-1 through -6, RDEIR pages 4.13-120 through -158.

Response to Comment R-26-TRANS-91. The Hollister Avenue//Los Carneros Road intersection would operate at LOS E under 2025 no project conditions. With the proposed mitigation measures, the intersection would improve to LOS D. The University is required to mitigate its fair-share of traffic impacts. Because the intersection would operate better with the proposed mitigation measure than under no project conditions, this requirement has been met.

Response to Comment R-26-TRANS-92. Please see response to comment R-26-TRANS-43.

Response to Comment R-26-TRANS-93. Please refer to Master Response - Phelps/Mesa Connection.

Response to Comment R-26-TRANS-94. As described in Section 4.13.2.2 (page 4.13-75), traffic forecasts for the LRDP impact analysis were developed without the planned regional roadway improvements, such as the widening of U.S. 101 or planned U.S. 101 overcrossings in the City of Goleta, since the funding of these improvements is uncertain (i.e., full funding has not been identified). This conservative approach (i.e., worst-case scenario) was applied to the LOS analysis to ensure traffic impacts of the LRDP were fully mitigated and to ensure that UC Santa Barbara was contributing its fair-share towards planned roadway improvements in the campus vicinity. Assuming all planned roadway improvements in place would have reduced the number of traffic impacts identified in the LRDP and reduced the number of proposed mitigation measures.

Traffic operations with future roadway improvements were analyzed as part of the mitigation measures for the LRDP. The LOS results with the GTIP improvements in place are presented under LRDP Impact TRAFFIC-1, LRDP Impact TRAFFIC-2, LRDP Impact TRAFFIC-4, and LRDP Impact TRAFFIC-5.

Response to Comment R-26-TRANS-95. Please see responses to comments R-26-TRANS-65 and -78. Pursuant to the detailed description of the fair-share mitigation measure, “Contributions will be made no later than the time the construction contract for the improvement is awarded by the entity making the improvement” (RDEIR, p. 4.13-116).

Response to Comment R-26-TRANS-96. Mitigation measures have been identified in this EIR to reduce significant impacts to transportation facilities. The commenter provides no specific comment about this approach.

Response to Comment R-26-TRANS-97. The LOS results, with and without the proposed 2010 LRDP, significance criteria, and significant traffic impacts are all identified in RDEIR Section 4.13, Transportation and Circulation.

Response to Comment R-26-TRANS-98. Please see responses to comments R-26-TRANS-78, 94, and 96.

Response to Comment R-26-TRANS-99. RDEIR Impact TRAFFIC-10 identified significant and unavoidable parking impacts in Isla Vista due to the proposed LRDP. This impact could be reduced to a less-than-significant level through implementation of a resident parking permit and enforcement program (RDEIR Mitigation Measure TRAFFIC-10A). Without this program, the University will not be able to monitor student, faculty, or staff parking in Isla Vista. Because this program has not been approved by the California Coastal Commission, however, the impact was identified as significant and unavoidable. The University has adequate parking supply on-campus to accommodate parking demand as shown in RDEIR Table 4.13-13. Please see response to comment R-26-TRANS-15.
Response to Comment R-26-TRANS-100. Please see responses to comments R-26-TRANS-15 and -99.

Response to Comment R-26-TRANS-101. The intersections of Los Carneros/Mesa and El Colegio/Mesa currently operate at acceptable LOS, and operations along El Colegio will improve upon the completion of the El Colegio widening project. Therefore, improvements previously identified as part of the previous LRDP were not implemented.

Response to Comment R-26-TRANS-102. A. Comment noted. This comment does not change the findings or outcome of the traffic impact analysis of the LRDP EIR.

B. Comment noted. This comment does not change the findings or outcome of the traffic impact analysis of the LRDP EIR.

C. The parking data collected for the Isla Vista parking study has been presented in the LRDP EIR. The parking study was intended to illustrate general trends in parking demand and occupancy within the Isla Vista Community, and estimate the number of students, faculty, and staff parking in Isla Vista instead of on the UCSB campus. Parking inventory and percent utilization throughout the day were documented.

D. As explained on RDEIR Page 4.13-45 and as shown in Table 4.13-24, cut-through trips were recorded for the main campus and the trip generation accounts for through traffic.

E. RDEIR Appendix 4.13-3 (pages 11-17) contains the documentation of the trip generation for the LRDP. As stated, the trip generation was based on a combination of traffic count data at existing University uses and travel survey data and validated to existing conditions as follows:

The trip generation rates based on travel survey data for students and faculty/staff were adjusted (increased) so that the trip generation of existing uses matched actual traffic counts at the campus gateways. Increasing the trip generation rates was necessary to account for visitor trips to/from campus (visitors are included in the trip generation rates for faculty/staff). In addition, although many students and faculty/staff typically commute to campus in a mode other than a SOV, they may occasionally drive to campus, which was not reflected in the travel survey results. The final trip generation rates applied to the LRDP traffic study produced existing forecasts that matched existing traffic counts on campus.

F. As described on RDEIR page 4.13-66, the trip generation rates assume that some vehicles will travel between the Main Campus and West Campus and between the proposed residential uses and the Main Campus. For example, the 543 new faculty/staff that would be residing on the main campus with the implementation of the LRDP were included in the trip generation for new on-campus housing and for new faculty/staff. Because these faculty/staff would not actually enter/exit the main campus gateways to travel to campus, a portion of the trips were assumed to remain “internal” to campus. The 25 percent internalization was only applied to these uses resulting in a net decrease of 11 percent (i.e., 202 internal trips out of 1,791 total trips during the p.m. peak hour). As stated in the RDEIR, vehicles traveling between the Main Campus, Storke Campus and West Campus would use non-campus roadways, such as El Colegio Road.

G. The effects of bicycle and pedestrian travel on study intersections in Isla Vista were evaluated. Tables 4.13-9 and 4.13-42 in the RDEIR present the findings of bicycle and pedestrian warrant analysis. In addition, UC Santa Barbara hosted a bicycle design charette in May 2009 with campus staff and members of the community, including the County of Santa Barbara, to identify bicycle and pedestrian improvements with the Ocean Road Housing project. The Ocean Road Housing project would enhance bicycle connections between the campus and Isla Vista. Fehr & Peers submitted a Draft Report to the University in June 2009 documenting the recommended improvements resulting from the charette. The University is committed to
working with agencies and local jurisdictions to ensure a complete and comprehensive study is conducted for
the LRDP.

The delayed housing scenario was based on the 2025 version of the LRDP model consistent with the
documentation provided in the model development report contained in the RDEIR. The only modification
made to the LRDP model was to update the UC Santa Barbara housing assumptions as described on Page
4.13-76 and shown in Table 4.13-37.

H. The comment is correct that the City of Goleta model does not forecast walk/bike trips, which is
consistent with the majority of travel demand models currently in use across the nation. The statement
regarding intrazonal trips does not change the findings or outcome of the traffic impact analysis of the LRDP
EIR. The difference between internal and intrazonal trips was discussed in the model development report
contained in the RDEIR.

I. The development of traffic volumes in Isla Vista and elsewhere, and the validity of the forecasts, is
explained in the model development report provided in the RDEIR.

4.14 Water

Response to Comment R-26-WATER-1: Please see responses to comment letters, A-9 and R-13 as well as
the Master Response – Water Supply.

Response to Comment R-26-WATER-2. Consistent with the 2008 WSA and standard water supply
planning procedures, the RDEIR analyzes present and projected future water supplies and demands on an
annual basis. Future peak daily demands may affect the required size and capacity of various components of
UCSB’s and GWD’s water supply infrastructures. New water supply infrastructure that may be required to
implement the LRDP, and the potential environmental impacts of constructing this new infrastructure, are

Response to Comment R-26-WATER-3. RDEIR Table 4.14-9 summarizes the total number of new
residential units proposed under the LRDP. Table 4.14-10 contains information on the water use at existing
residential units for the purpose of calculating water demand factors. The other tables from section 4.14
mentioned in the comment do not contain information on the number of residential units to be built, but
rather calculate the supply and demand district-wide, including LRDP demand.

Table 4.10-21, by contrast, counts planned bedspaces of student housing rather than residential units. For the
purpose of calculating water demand, the University estimates 4 bedspaces per residential unit. This factor is
reflected in EIR Table 4.14-9, with a total of 3,304 residential units associated with the LRDP. Of this total
number of units, 1,874 are faculty/staff units, 239 are family student units, and 1,191 are dormitory units, for
a total of 3,304 units. The 1,191 dormitory units would accommodate 4,766 bedspaces. There is thus no
discrepancy between this table and the tables in section 4.14.

Response to Comment R-26-WATER-4. Please see Master Response – Water Supply section V.E.

Response to Comment R-26-WATER-5. RDEIR Section 4.14.1.5, referred to by the commenter, does not
discuss specific allocations of water. The RDEIR does not propose to use water in the Central Coast Water
Authority drought buffer for growth under the LRDP. The Goleta Water District’s water supplies and future
recycled water capacity will be sufficient to meet University demand under the LRDP. Please see Master
Response – Water Supply sections II and VI.B.

Response to Comment R-26-WATER-6. Please see Master Response – Water Supply section V.E.
Response to Comment R-26-WATER-7. Groundwater pumping would be conducted within the constraints described in the RDEIR on pages 4.14-3 to -4, including maintenance of all required buffers. Please see Master Response Section III.D. Under the RDEIR's significance criteria (p. 4.14-26), the increased groundwater pumping would not result in a significant impact, as the pumping would neither affect the safe yield of the basin, nor affect other groundwater users. RDEIR, p. 4.14-33.

The RDEIR addresses the impact during critical-dry and multiple dry years of cumulative increased groundwater use on page 4.14-33.

Response to Comment R-26-WATER-8. The RDEIR clearly acknowledges that growth under the LRDP will increase demand for water within the Goleta Water District. Impact W-3 states that the 2010 LRDP development, combined with additional development within GWD’s service area “may increase the cumulative demand for potable water beyond the total supplies available to GWD in a normal runoff year.” RDEIR, p. 4.14-34 (emphasis added). This impact properly characterizes the water analysis in the RDEIR as summarized in Master Response – Water Supply section II.

Please see Master Response - Water Supply section VI regarding the relevant mitigation measures. Mitigation measure W-3F requires the University to “work to identify and acquire additional water supplies beyond those currently available to GWD as necessary to serve UCSB potable water demand independently or with GWD, as appropriate.” (emphasis added). This mitigation measure is both enforceable and feasible as described in Master Response – Water Supply section VI.B.

Regarding the alternative mitigation proposed by commenter, please see Master Response - Water Supply section VI.D.

4.15 Wastewater

Response to Comment R-26-WASTEWATER-1. Comment noted.

Response to Comment R-26-WASTEWATER-2. The RDEIR concludes that impacts to wastewater facilities would be significant and unavoidable, in part because the increase in permitted treatment plant capacity to the University needed to serve buildout of the LRDP is not within the University's direct control. Based on discussions with the GWSD, however, there is adequate pipeline/pump station capacity to serve buildout of the University in accordance with the 2010 LRDP. Minor infrastructure up-sizing may be required (see Impact WW-2), but the backbone is sufficient. According to Ryan Lodge of the Regional Water Quality Control Board, there do not appear to be any restrictions or impediments to increasing the permitted capacity of the treatment plant in an amount sufficient to serve full buildout of the 2010 LRDP and projected cumulative growth (pers. comm. October 2008).

While the University's wastewater flow at LRDP buildout is projected to exceed the University's ownership share of the capacity in the treatment plant, because the treatment plant will still have excess capacity in 2025, the plant will not need to be increased in size. The University will negotiate with GSD and/or GWSD to purchase additional treatment plant capacity. In any event, the treatment plant's NPDES permitted capacity will need to be expanded to serve new development within the GSD with or without the 2010 LRDP, but increasing the NPDES permit capacity will not involve any physical changes that could have a significant effect on the environment. Any changes would consist of replacing equipment within the existing facility. The University, like any discharger, is otherwise prohibited by law from exceeding the capacity of the treatment plant that is available to it.

Response to Comment R-26-WASTEWATER-3. Please see response to comment R-26-WASTEWATER-2.
March 30, 2009

Mr. Tye Simpson  
Director of Campus Planning and Design  
University of California, Santa Barbara  
Office of Campus Planning & Design  
c/o Vision2025  
Santa Barbara, CA 93106-1030

Dear Mr. Simpson,

The Community Environmental Council is a local environmental non-profit organization founded in 1970 and based in the City of Santa Barbara. Our flagship campaign is to wean the Tri-Counties region off fossil fuels by 2033 or sooner, effectively eliminating greenhouse gas emissions on a net basis. More information on our programs can be found at www.fossilfreeby33.org. We thank the University for the opportunity to comment on the recirculated Draft Environmental Impact Report for the Long Range Development Plan and look forward to working with staff in the coming months to complete a comprehensive plan.

The University is a major cultural and employment asset in Santa Barbara County. The LRDP proposes some innovative strategies to allow our community to grow in a more sustainable manner, and could be a model for new development. While we applaud the efforts toward energy efficiency, renewable energy, and transportation demand management, we are disturbed by the significance findings regarding greenhouse gas (GHG) emissions. In particular, the DEIR does not include an adequate baseline for GHG emissions, nor an adequate assessment of the GHG emissions from the proposed new buildings. Furthermore, the DEIR uses the proposed projects within the LRDP to estimate “business as usual” for a threshold of significance, when the baseline should be the emissions resulting from current operations.

CEC also supports the University’s plan to house all of the projected growth in students and staff on or near campus. By enabling this population to live close to school and work, many vehicle commute trips will be eliminated, allowing for more sustainable living patterns and less impacts on the surrounding roads and community. However, as the models predict, there will still be a significant amount of new trips generated, particularly by family of staff and off campus trips by students and staff. Thus, there will be deterioration in level of service (LOS) for many surrounding intersections. While we support the mitigation proposed in the DEIR we feel that these measures are too vague and need to be further explained to reduce the impacts levels to less than significant.

A more detailed discussion of our concerns is below:
Other State-Regulated Pollutants (pg. 4.2-5)

Under Other State-Regulated Pollutants (pg. 4.2-5) there is an inaccurate reference for “Section 6.3, Global Climate Change.” This reference should be changed to reflect the current Climate Change Section: 4.2.3.

Climate Change (Section 4.2.3)

We support the University’s Campus Sustainability Plan (CSP), and the UCOP Policies on Sustainable Practices. In particular, we are excited by the requirements for new buildings, efficiency upgrades, renewable energy, and transportation. We also support the University’s goals to meet CARB’s Preliminary Draft GHG Significance Thresholds (pg. 4.2-54 through 4.2-55).

While the University has taken an important first step to understanding their carbon footprint, the 2007 emission calculation is seriously lacking because it does not include private vehicle trips (pg. 4.2-57). Though the DEIR states that the University will conduct an inventory that includes GHG emissions from “fleets, commuting and business air travel” (pg. 4.2-15), the current “baseline” is insufficient because these emissions are not included. Additionally, the emissions attributed to the transportation section of the LRDP should be included in this section (currently we are referred to Section 4.13) to facilitate a comprehensive discussion of GHG emissions.

In addition, the estimated GHG emissions from the LRDP off campus electricity and natural gas use seem to be incomplete. The emissions from the additional 5,443 student bed spaces, 239 student family units, and 1,874 faculty and staff housing (pg. 4.10-26), must be accounted for to adequately assess the future GHG emissions from the LRDP. The 7,000 bed spaces and residential units will more than double the existing bed spaces and units from 2007. This increase brings about two questions regarding the completeness of Table 4.2-20 LRDP GHG Emissions (pg. 4.2-59) and Table 4.2021 LRDP GHG Emissions with Housing and Scoping Plan Measures (pg. 4.2-60).

1). Given this increase, how is it that the emission levels of the LRDP do not change for off-campus electricity and natural gas use depending on the inclusion of housing in the LRDP?

2). Given the more than doubling of the housing stock, how will the emissions from off-campus electricity and natural gas decrease by approximately 30 percent?

A more in-depth analysis of current and future building energy use on campus and off-campus must be included for the DEIR to be deemed complete. The analysis should also be applied to vehicle trips due to the fact that there is no existing baseline for vehicle trips making the estimated reduction invalid.

GHG Significance Determination (pg. 4.2-61)

Under CEQA, the baseline from which to evaluate project impacts is typically “the physical environmental conditions in the vicinity of the project, as they exist at the
time the notice of preparation is published.” Guidelines § 15125(a). Thus, any baseline
to measure significance should be an inventory of current operations – which represents
the “business as usual” estimation; meaning that any additional emissions over current
levels must be considered significant. Therefore, the finding of no significance is invalid.
AB 32 requires statewide emissions of GHG to return to 1990 levels by the year 2020,
this equates to a reduction in emissions of 30 percent over business as usual.

The LRDP does not represent business as usual. Business as usual is the
continuation of existing student, staff, and faculty levels, with no new projects. The
LRDP is a new project (hence the need for an EIR) and therefore any emissions resulting
from the LRDP must be assessed against the existing baseline GHG emissions.

While there is no official emission threshold yet, several state agencies have
decided that a zero emission threshold is required to meet the requirements of AB 32
(including California State Lands Commission1). This means that any additional
emissions, over and above the baseline – current operations – would be considered
significant and must be mitigated to the greatest extent possible.

**GHG Emission Mitigation**

Energy efficiency and conservation are generally the most cost-effective means to
reduce GHG emissions. Many of the plans for building retrofits and renewable energy
may be able to be counted as mitigation for the increased GHG emissions from LRDP
projects. Due to the inadequate baseline and future GHG emission estimates, we cannot,
at this time, quantify the benefits of any specific mitigation measures.

If any GHG emissions are not able to be mitigated through improvements to the
campus, GHG emission offsets may be purchased provided that all offsets are verifiable
through an unbiased, legitimate third party, like the California Climate Action Registry.
The two most important characteristics of GHG emission offsets are validity and
additionality. Verification through a third party ensures that emission offset projects
have actually occurred and have offset the claimed emission amounts. Additionality can
be more difficult to assess, but is equally important. Additionality means that any offsets
need to provide for an opportunity or project that would not otherwise have occurred.
Only when both these criteria are met, can an action be considered an offset.

**Transportation and Circulation**

CEC applauds the University for their plan to house all of the projected growth in
students and staff on or near campus, which will help mitigate some of the congestion
impacts from the LRDP. However, there will be deterioration in level of service (LOS)
for many surrounding intersections in the City of Goleta, County of Santa Barbara, on
campus, and on CalTrans freeways, resulting in the six significant impacts as designated

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1 California State Lands Commission, Recirculated DEIR, Venoco Ellwood Marine Terminal Lease
Renewal Project, CSLC EIR #743. 2008
(TRAFFIC-1 to TRAFFIC-6). Some of these impacts are significant, even with the mitigations that the University plans.

The DEIR proposes to mitigate the significant impacts by paying a proportionate share for roadway improvements in surrounding impacted areas, monitoring traffic conditions at impacted intersections, and working with stakeholders to determine appropriate alternative transportation improvements to mitigate traffic. The focus of our transportation comments are on the LRDP Mitigations TRAFFIC-1A through Traffic–6A (pg. 4.13-119 through pg. 4.13-153). The mitigations include vague goals to enhance and promote existing transportation demand measures, and develop new measures to achieve an overall reduction of 10 percent of trips to and from campus. This mitigation will not reduce congestion impacts below to less than significance.

Mitigation Measures TRAFFIC-1A through TRAFFIC-6A (pg. 4.13-119 through pg. 4.13-153)

In order to fully mitigate the transportation impacts, CEC would like the University to consider mitigation measures that would result in a greater than 10 percent reduction of trips to and from campus. The University has an opportunity to build a model community from the ground up. With aggressive transportation demand measures, as well as new transit and alternative mode programs, the University should target a 20 percent or 30 percent reduction in trips. This would more substantially alleviate congestion concerns, as well as help the University reach greenhouse gas emission reduction goals from commuting. CEC has many ideas on how these goals could be reached, and is willing to work with the University to share success stories from other organizations and to pilot and develop appropriate programs.

In particular, the following traffic mitigation measures should be added to TRAFFIC-1A through TRAFFIC-6A (pg. 4.13-119 through pg. 4.13-153):

- Increased funding for the Transportation Alternatives Program. This successful program encourages and incentivizes staff and students to use alternative transportation. Many innovative and successful programs have come out of TAP. It currently is staffed at 1.5 full time employees, but has a diminishing revenue stream and over the past few years has received less and less funding. With more resources and/or increased staff, TAP could be an instrumental part in reducing trips to and from campus.

- Individualized marketing of specific modes of alternative transportation. The University has taken many steps to encourage alternative transportation at the campus, but could additionally adopt additional commuter benefits strategies utilized by other large employers like Cottage Hospital and the City and County of Santa Barbara. Examples include monthly stipends or additional vacation time for employees who take alternative transportation more than 80 percent of the time, or a no interest loan for a commuting bicycle. These programs could also
help reduce the new parking needed at the University, which at $17,000 to $35,000 per space for structured parking, is very expensive.

- Increase ridesharing and vanpools to campus. While many staff, faculty and students utilize ridesharing and vanpooling, more could be done to encourage ridesharing and vanpools through synergistic efforts with many of the other strategies proposed in this letter, for example, the monetary incentives above could be combined with reduced cost parking permits for ridesharing.

- Integrate car-sharing into the new development, as well as into existing employee and student housing. Parking is a major issue and cost on campus and in Isla Vista. As employee housing will allow employees to walk or bike to work, many of these families could become one car (or no car) instead of two car households. The University should expand the current Zipcar car-sharing agreement to provide a fleet of vehicles for employees and students. A certain number of free hours could be included in monthly rent, and parking spaces could be sold or rented separately from the development to encourage utilization of car-sharing. Studies show that car-sharing members drive less and use alternative transportation more.

- Increased commercial activity in the proposed development and in Isla Vista. Currently, the sizeable population of Isla Vista and the University must travel to Goleta or Santa Barbara for necessities such as a full service grocery store, etc. Isla Vista developments and mixed use new commercial development could incorporate additional community needs (grocery store, corner and convenience stores, restaurants, drycleaners, etc.) so that more of the population’s needs are met within an area that can be reached by bike, foot, or bus.

- Shuttle to Camino Real Marketplace and other frequented destinations. While an electric MTD shuttle may soon be started and funded for 3 years, this program should be expanded for the life of this project to make it easy for students to access this shopping district without generating more car trips. New shuttles should also go campus wide to connect new staff housing with offices and make it easier to get around campus without a car. These shuttles should utilize alternative fuels such as electricity or biodiesel.

- Encourage telecommuting and flexwork (working 4/40 or 9/80 schedules). UCSB went through an extensive demonstration process with SBCAG’s Traffic Solutions to develop telecommuting and flextime policies. However, it is now up to department heads to promote the programs and there has not been a large adoption of telecommuting and flexwork. The University should make policies that set targets depending on how applicable each strategy is for various departments, and promote these targets. If all the groundskeepers went to a 4/40 workweek or administrative staff telecommuted one day per week, or even one day per month, significant trips could be averted. As many staff live in North County or Ventura, this option could also save significant amounts of fossil fuels.
New parking limitations. While the current parking system has helped UCSB have a high adoption of alternative modes, more could be done to discourage students and staff from commuting in single occupancy vehicles. Parking fees could be raised, carpool permits could be free instead of half price, etc. As new structured parking can cost from $17,000 to $35,000 per space, it is only fair to reward those that chose alternative transportation and charge those that drive alone the full cost of providing parking.

Free, unlimited bus passes. While students already receive bus passes, this program could be expanded to staff and faculty.

One way to fund these programs is through a building tax, as is done at Stanford University through their Stanford Infrastructure Program. This money could then fund parking and alternative transportation programs to decrease impacts on surrounding communities.

Mitigation TRAFFIC-7A, pg 4.13-159

Bikes are one of the most used modes of transportation on campus, with 50 percent of students and 9 percent of faculty and staff community by bike. The LRDP will significantly affect biking and walking on campus as indicated in impact TRAFFIC-7 (pg. 4.13-159). Mitigation, the University proposed to implement various biking and walking projects (LRDP Mitigation TRAFFIC-7A, pg 4.13-159). In addition to these mitigations, the following community projects could be considered to build-out relevant parts of Santa Barbara County’s bicycle infrastructure and make it easier for students, staff, and faculty living in adjacent areas to safely access the University and nearby shopping.

- A short Class 1 bike path through Girsh Park to Camino Real Marketplace. Currently, bicyclists have to travel alongside heavy motor traffic on Storke Road to access Camino Real Marketplace. This new bike path would make it easier and safer for bicyclists to access this shopping district.

- A Class 1 bike path along San Jose Creek, connecting with the Coast Route. This would allow bicyclists West of Highway 217 a safe and easy way to access the Coast Route. Many students/staff/faculty could benefit from this path. The City of Goleta has funding for some planning work regarding this route, and the University could work with the City of Goleta to develop and fund this path.

TRAFFIC-8 pg. 4.13-161

The DEIR states that the impact of the LRDP on transit ridership TRAFFIC-8 (pg. 4.13-161) will be “less than significant.” Due to the current demand on the MTD lines and the potential increase in demand to those lines, the impact level should be increased to “significant.” Currently six MTD lines serve UCSB, approximately one quarter of
MTD routes. As transit services only recover a portion of revenue from the farebox, it is unlikely MTD will be able to expand service sufficiently to serve the new population. As is, these lines are some of the most crowded on the system, with boarding denials required at times because of overcrowding. Therefore, it is likely that these routes will become overcrowded as University population grows, affecting both University riders and other community members and resulting in overcrowding and boarding denials – a significant impact.

**Mitigation TRAFFIC-8A (pg. 4.13-161)**

Due to the resulting significant impact to transit ridership, mitigation measure TRAFFIC-8a is inadequate. The University should work with MTD and long distance commuter bus providers to provide an appropriate payment for capital costs, as well as continued payments to assist annual operating budgets.

**Conclusion**

In order to be deemed complete and valid, the Final EIR must:

- Conduct an adequate baseline study of existing GHG emissions
- Analyze additional GHG emissions resulting from additional VMT and new construction
- Fully mitigate any GHG emissions over existing levels through activities like energy efficiency upgrades to existing buildings, investments in renewable energy, or transitioning to a full electric fleet.
- Agree to specific mitigation measures and numeric goals that will ensure a decrease single occupancy vehicle commuter and trips to and from campus.
- Increase mitigation measures for impacts to bicycle and transit commuters.

We thank the University for the opportunity to comment on the LRDP and look forward to working with Staff in preparation of the Final EIR.

Sincerely,

Megan Birney,
Senior Energy Associate,

Michael Chiacos,
Senior Energy Associate,

Dave Davis,
Executive Director
Response to Comment R-27-1. Comment noted. The text on page 4.2-5 of the recirculated Air Quality Section has been revised to read as follows:

See Section 6.3.4.2.3, Global Climate Change, for more pollutants of concern specifically related to climate change.

Response to Comment R-27-2. A. Private vehicle emissions estimates for 2025 are included in Table 4.2-19 (RDEIR, p. 4.2-58). Because, as explained in response to comment R-21-8, the RDEIR’s analysis compares the emissions from development under the LRDP against emissions under a “business as usual” strategy, this projection is sufficient to support the analysis.

B. Table 4.2-20 has been revised as follows:

<table>
<thead>
<tr>
<th>Source</th>
<th>Incremental Change in Throughput¹</th>
<th>Units</th>
<th>Emissions Without Housing on Campus² (MTCO₂e/yr)</th>
<th>Emissions With Housing on Campus (MTCO₂e/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Backup Generators</td>
<td>3,284</td>
<td>gal, diesel</td>
<td>34</td>
<td>34</td>
</tr>
<tr>
<td>Main Campus</td>
<td>35,692,178</td>
<td>kWh</td>
<td>14,428</td>
<td>14,428</td>
</tr>
<tr>
<td>Electricity from Academic Buildings</td>
<td>144,749,1349,710</td>
<td>therms</td>
<td>7,234,7180</td>
<td>7,234,7180</td>
</tr>
<tr>
<td>Marine Vessels</td>
<td>5,400</td>
<td>gal, gasoline</td>
<td>48</td>
<td>48</td>
</tr>
<tr>
<td>Off Campus</td>
<td>1,386,40024,826,275</td>
<td>kWh</td>
<td>553,10,030</td>
<td>553,10,030</td>
</tr>
<tr>
<td>Electricity from LRDP Housing</td>
<td>426,9181,351,653</td>
<td>therms</td>
<td>6,757,191</td>
<td>6,757,191</td>
</tr>
<tr>
<td>Transportation Fuel – Fleet</td>
<td>1,784</td>
<td>gal, diesel</td>
<td>18</td>
<td>18</td>
</tr>
<tr>
<td>Transportation Fuel – Fleet</td>
<td>53,855</td>
<td>gal, gasoline</td>
<td>474</td>
<td>474</td>
</tr>
<tr>
<td>Construction Activities²</td>
<td>0</td>
<td>acres</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Water Use²</td>
<td>856</td>
<td>acre-feet</td>
<td>1,412</td>
<td>1,412</td>
</tr>
<tr>
<td>Private Vehicle Trips²</td>
<td>460,088</td>
<td>VMT/day</td>
<td>68,099</td>
<td>27,291</td>
</tr>
<tr>
<td><strong>TOTAL EMISSIONS</strong></td>
<td></td>
<td></td>
<td><strong>92,976,108,914</strong></td>
<td><strong>52,789,68,736</strong></td>
</tr>
</tbody>
</table>

Percent Reduction 43% 43%
<table>
<thead>
<tr>
<th>Significance Threshold</th>
<th>30%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cumulatively Considerable?</td>
<td>No</td>
</tr>
</tbody>
</table>

Notes: 1. CCAR reported activity (i.e. direct and electricity) scaled by 40% to estimate LRDP impacts.
2. GHG emissions are based on 2007 emission levels scaled by 40%, except for main campus and off-campus electricity and natural gas, where emissions are calculated based on change in gross square footage of residential space.
3. Construction activities will not change from existing levels because project is mostly infill.
4. Private vehicle trips based on Table 4.13-33, URBEMIS run in Appendix 4.2-5, and adjusted to account for 59% reduction in VMT from housing based on Goleta TDM modeling results in Tables 4.13-41 and 4.2-19. URBEMIS results in tons converted to metric tons as presented in this table.

Table 4.2-20 presents the incremental change in GHG emissions that may result from the 2008 LRDP. The incremental change in throughput was based on a percent increase in square footage of 40%. This percentage change was applied for both main campus and off-campus impacts. This is correct for the main campus changes, however as noted by the commenter, the off-campus increase is greater than 40%. In Table 4.2-20, the incremental change in throughput for Electricity from LRDP Housing (formerly “Off-Campus Electricity”) and Natural Gas from LRDP Housing (formerly “Off-Campus Natural Gas”) were recalculated based on an estimated LRDP additional housing gross square footage of 5,517,000. In addition, two typographical errors were corrected; the Natural Gas from Academic Buildings (formerly “Main Campus Natural Gas”) throughput and the Private Vehicle Trips Emissions With Housing on Campus (formerly “LRDP Related Housing”). Table 4.2-21 was also revised to reflect the Table 4.2-20 changes shown above.

The comparison of emissions levels with and without LRDP related housing is actually comparing the difference in emissions related to private vehicle trips. The column titled Emissions Without Housing on Campus (formerly “Emissions Without LRDP Related Housing”) represents the increase in emissions due to longer commutes, if additional housing were not included in the LRDP. It is assumed that housing necessary to accommodate the increase in student and faculty will occur, whether it occurs at the UCSB campus as part of the LRDP or in the community. Regardless of where housing will be built it will have GHG emissions from natural gas and electricity. Therefore, the Electricity and Natural Gas from LRDP Housing emissions are assumed to remain the same in that these emissions will occur whether the additional students and faculty are accommodated in LRDP housing or in nearby community housing. Building the housing as part of the LRDP reduces private vehicle related emissions by reducing vehicle miles traveled.

The percent reduction that is being considered is the reduction in emissions compared to business as usual (i.e., no emission reductions measures implemented). AB 32 and CARB assume that growth will occur. The Scoping Plan identifies measures which when implemented will reduce statewide emissions in 2020 by 30% compared to what they would have been if no measures had been implemented. The percent reduction presented in Table 4.2-20 is the reduction that will occur by building housing on campus as compared to students and faculty commuting from the local community, which would be considered business as usual. The percent reduction presented in Table 4.2-21 is a combination of the reduction in Table 4.2-20 along with reductions which will occur with implementation of the AB 32 Scoping Plan measures.

Vehicle emissions are included in the analysis. A baseline for vehicle trips is not needed because the analysis is based on the incremental change in emissions, not total emissions.

The changes made to Tables 4.2-20 and 4.2-21 result in percent reductions in emissions compared to business as usual, of 37% and 52% respectively. Both of these percent reductions still meet the significance threshold of a percent reduction greater than 30% over business as usual.
In summary, the changes to the titles of several rows in the table clarify that the analysis of greenhouse gas emissions assumes that housing for the population under the LRDP will use the same amount of electricity and natural gas whether that housing is on or off campus. The scenarios differ only in that if housing is provided on-campus, as proposed under the LRDP, Campus affiliates will drive substantially less than under a business-as-usual scenario of off-campus housing. The row titled “Private Vehicle Trips” shows the decrease in emissions brought about by this decrease in driving.

This approach likely understates the emissions savings under the LRDP, as housing constructed pursuant to LRDP policies CC-1 and CC-2, requiring energy efficiency in new buildings, will likely be more energy efficient than off-Campus housing.

Other changes in Table 4.2-20 reflect corrections to minor calculation errors and do not alter the RDEIR's conclusion that development under the LRDP will not make a cumulative considerable contribution to greenhouse gas emissions.

Response to Comment R-27-3. Please see responses to comments R-21-8 and R-33-2.

Response to Comment R-27-4. Because the RDEIR determines that the LRDP’s contribution to global climate change is not cumulatively considerable and therefore is less than significant, no mitigation is required.

Response to Comment R-27-5. The TDM program is only one of several proposed mitigation measures meant to reduce traffic impacts. Physical roadway improvements have been identified as further mitigation measures. Analysis of the efficacy of these improvements assumes that TDM will achieve no new traffic reductions. Thus, when both TDM and improvements are implemented, traffic conditions may be better than the RDEIR projects.

Throughout the RDEIR, where mitigations, such as traffic improvements, are within the responsibility and jurisdiction of another jurisdiction, the relevant impact is considered significant and unavoidable, even if the mitigation would, if implemented, reduce the impact to a less than significant level. Such mitigation measures commit the University to work with the relevant jurisdictions on implementing the improvements and to contribute its fair share of the cost of improvements.

Response to Comment R-27-6. Please see responses to comments R-4-19 and I-36-13A.

Regarding proposed parking restrictions, please see response to comment I-26-8B.

Response to Comment R-27-7. Although the University does not propose bicycle facilities outside its own jurisdiction, it does include extensive plans for improvement on campus and connectivity with regional bike routes. Figures 4.13-4A and 4.13-4B illustrate the proposed bicycle and pedestrian facilities with the LRDP. Moreover, because Impact TRAFFIC-7 concludes that Project would have less than significant impacts related to bicycling conditions, no further mitigation is required. Please see response to comment A-12-48 for more information.

Response to Comment R-27-8. Please see responses to comments A-13-1 and A-12-48. Every student at UCSB pays a fee to MTD as part of registration. The approximately $40 fee generates about $750,000 for MTD annually. With a proposed increase in student population of 5,000, this will increase annual revenue to MTD by $200,000 at full enrollment. In addition, all of the proposed increase in students, faculty, and staff will be housed on campus; therefore, commuting by bus to campus will be greatly reduced for this population over the current population (less that 5% uses MTD to commute to Campus). Thus, MTD will be receiving proportionately more funds for fewer riders in this future population. In addition to this funding, the University may also, pursuant to Mitigation Measures TRAFFIC-1a and 2A, contribute to specific MTD
projects to maintain and improve MTD service between the Campus, Isla Vista, and other neighboring communities.
From: UCSB Vision [mailto:info@ucsbvision2025.com]
Sent: Monday, March 30, 2009 4:12 PM
To: 'Balster'
Subject: RE: FW: UCSB LRDP from a Storke Ranch owner

Thank you for your comments/questions regarding the UCSB Long Range Development Plan. Your correspondence will be entered into the record and addressed within the formal response that will follow after the public comment period closes on 3/31/2009. If you would like to receive notice of future meetings and/or report releases and are not currently on our mailing list, please register on the project Web site, http://www.ucsbvision2025.com/contact.html. We appreciate your interest in UCSB.

From: Balster [mailto:Balster@att.com]
Sent: Friday, March 27, 2009 11:27 AM
To: info@UCSBVision2025.com
Subject: Re: FW: UCSB LRDP from a Storke Ranch owner

Dear UCSB,
I have received the below email from the homeowners association at Storke Ranch regarding your "Environmental Impact Report (EIR) for their Long Range Development Plan (LRDP)". To that I wish to make my opinions known on the issue of traffic.

I do agree with the below email on the need to widen El Colegio Road, although I've seen that already underway and nearly complete if not already so (I don't go that way very often). As for the connection of Mesa Road to Phelps Road, I do hear the concerns of many Storke Ranch association members but I am not entirely opposed to such a connection. Actually I think it would be good to have an alternate evacuation route available to Storke Ranch so having Mesa and Phelps roads connected would be beneficial provided that there's not a large traffic flow thru that street. I agree with one possible approach which is to add a traffic control device at the intersection of Phelps Rd and Bayberry Lane. Now I'm thinking that a 3-way stop sign actually could be all that's needed there. The below letter also fails to mention the traffic issues which the Married Student housing along Mesa road between Los Carneros and Phelps Roads. There are 3 intersections along Mesa Road between Los Carneros and Access Road, each of which will also need traffic control, such as an additional 3-way stop sign, and also at the intersection of Mesa Road and Access Road. Having these 5 quantity 3-way (all way, since they are T intersections) stop signs along the stretch of Mesa-Phelps Roads between Los Carneros and Storke Roads will serve the purposes of

1) allowing easy entrance/exit from the communities along that stretch of road
2) deterring impatient drivers from taking that route, thus somewhat limiting the volume of traffic flow
3) creating an alternate evacuation route for both the Storke Ranch and Married student housing areas

As both of those communities are residential, the section of Mesa-Phelps between Los Carneros and Storke Roads should be posted at the standard residential speed limit of 25 MPH

And lastly and probably the most important thought, Have you considered adding an additional traffic lane in both directions to Los Carneros Road? That should provide better, safer and faster traffic flow than connecting two narrow, low speed limit residential streets together!
Sincerely,
James Balster
529 High Grove Ave
Goleta, CA 93117

At 01:32 PM 3/26/2009, you wrote:

For your information, the following is from an owner at Storke Ranch regarding UCSB.
Thank you.

James Nguyen
Bartlein & Company, Inc.
3944 State St. #200
Santa Barbara, CA  93105-3170
Phone:  805-569-1121 #204
FAX:  805-682-4341

This message may contain information that is privileged or confidential. If you received this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments. Thank you.

From: Kelly Hildner [mailto:kelly@dock.net]
Sent: Tuesday, March 24, 2009 8:12 PM
To: Nguyen, James
Subject: UCSB LRDP

Please comment on the UCSB revised EIR!
Deadline: March 30th

Email: info@UCSBVision2025.com

or

Mail: University of California
Office of Campus Planning & Design
c/o Vision2025
Santa Barbara, CA 93106-1030

UCSB has revised and recirculated the Environmental Impact Report (EIR) for their Long Range Development Plan (LRDP). The chapters that have changed are: Air Quality, Population and Housing, Transportation and Circulation, Water, and Wastewater.

The Phelps Road extension (Phelps/Mesa connection) is still the primary roadway mitigation in the EIR. However, the revised transportation section seems to acknowledge that completing the widening of El Colegio would be a possible alternative.

**Issues you might consider addressing in a letter/email to the university include:**

- Phelps/Mesa connection
  - Enhancing the public transit system servicing West Goleta to include more routes and more frequent service to UCSB is a more effective and sustainable long-term solution to UCSB’s traffic impacts.
Completing the widening of El Colegio is a preferable alternative to the Phelps/Mesa connection.

Preventing freshmen and sophomores from bringing cars to campus is another alternative.

The proposed widening of Phelps Road at the Phelps/Storke intersection is not adequately studied and would not be feasible because there are wetlands adjacent to the road. The university has not properly analyzed the impacts involved with opening Phelps Road, including the impact to the Phelps/Bayberry intersection.

Request that the university refrain from creating the Phelps/Mesa vehicle connection in order to protect pedestrian and bicycle safety.

Request that the university refrain from creating the Phelps/Mesa vehicle connection to protect the integrity of our community from division, air pollution, noise, and traffic hazards.

- Limiting UC enrollment to limit impacts on the surrounding community and the environment.
- Request that the university cap enrollment at a lower number to limit the impacts on the community.
- Mention any concerns you have about the cumulative impacts of additional people, cars, and buildings on air quality, traffic, noise, aesthetics, sensitive wetlands, recreational facilities, water, wastewater facilities, etc.

Storke Family Housing Site adjacent to Storke Ranch to the east

- Request that the university decrease the density of proposed housing – currently planned for >5 times that of Storke Ranch – to be compatible with the existing community
- Request that the university decrease the height of the proposed housing to be consistent with the existing community and avoid blocking views of the mountains
- Request that the university add a minimum 100 ft green space with trees and other landscaping between the new buildings and Storke Ranch to provide a buffer and enhance views and the bike path.
- Request that the university change the orientation of units adjacent to Storke Ranch so the garages and garbage access are facing away from Storke Ranch to minimize noise impacts.

Francisco Torres Site

- Request that the university eliminate the student dorm building planned for immediately adjacent to Storke Ranch, or at least create some buffer space and reduce the height of new buildings to match the scale of the Storke Ranch community.

((((((()))) Jim Balster
//   \ E-mail: Balster@att.com
// - - \ Voice: (805) 879-4337 (direct)
|/(O)-(O)| or (805) 964-7724 x337
(|     |) Fax: (805) 967-7094
|   |
\_____/ / Snail Mail: AT&T Government Solutions
 \_______/ (formerly GRC International)
      5383 Hollister Avenue, Suite 200
       Santa Barbara, CA 93111
Letter R-28
James Balster

3/27/2009

Response to Comment R-28-1. Please see Master Response - Phelps/Mesa Connection.
Student Comments on the RDEIR of the LRDP Population and Housing Section  
Geography 185A – Urban Planning Issues  
March 2009

The EIR focuses on the mitigation measure of increasing the number of beds to fit the number of increasing enrollment. It also describes increasing the number of faculty and staff housing to meet the increasing numbers of faculty and staff that will be needed to teach the additional students. However, it does not provide any mitigation for the multiplier affect that the expanding campus will have on the surrounding community. In section labeled "Growth Inducement" it says that UCSB expenditures created 4,820 non-university jobs between 2002 and 2003. The expansion of the school will create significantly more jobs, which will require more employees and increase the housing stress already felt by a housing stressed community. For the university to mitigate the university's housing impact by building more dorms this EIR is not taking into account the full impact of this project. There needs to be some kind of attention paid to the overflowing impacts into the community. I believe a reasonable mitigation measure would be for the university to develop low and medium income housing within Goleta, since it will be the city that will feel the negative affects of the University's expansion most.

S.M.

University housing projects must be self-sustaining (UC does not allocate funding for these). I do not think this will be a problem, because the Housing and Population EIR states that campus housing facilities are consistently occupied and there is often a waiting list for continuing and new students. Also, some areas where a large percentage of students have historically lived, such as Isla Vista, are built out and already have densities in excess of zoning limits. Therefore, the university already has a demand for more on-campus housing. Further, with the projected 5,000 student increase in enrollment, there will be even more demand for university-provided housing. Therefore, after considering current and future demand, it is evident that new housing projects are needed and would be self-supporting.

In relation, the report overlooked the overcrowding of students in campus housing that is already occurring. When I was a freshman in the East Side Residential Halls, there were not enough rooms and three people had to share a room built for two. A prospective student might be discouraged by this situation and decide to attend another school. Also, I think it is important, and was not sufficiently addressed in the report, that students have more options to live on-campus after their first year. I know many of my friends’ parents were not thrilled with the idea of them moving to Isla Vista after only one year in the dorms. Therefore, to attract more students to UCSB and increase the quality of students attending, the university should ensure that overcrowding is not an issue for freshmen and provide more housing for students after their first year.

L.M.

Regarding student on campus housing I think that there should be an option for students to live in dormitories without having to have a meal plan with the on campus dining commons. The monthly meal plans are expensive and make dormitory housing more expensive and unaffordable for low-income students. Instead, there should be an option for students to make their own food in the dormitories. This would be made possible with the addition of adequate
kitchens. There would also be a need for added safety measures with the addition of these kitchens.

Regarding the housing policies listed, I agree with that there should be incentives for Isla Vista to utilize green building techniques, build public infrastructure and assemble sites, as listed in Housing Policy 6. However, I also think there should be incentives to improve housing quality and character of existing buildings as listed in Housing Policy 5. Without some sort of incentives there is little chance for these buildings to be improved.

C.B.

There are mentions of concerns for housing costs and rents in both apartments and houses for the UCSB surrounding area. Rent goes up pretty consistently every year, in most places by at least $100 a month. Just because additional housing is available on campus, there seems to be a stigma against people living in university housing, and students do not want to deal with all the regulation put upon living in those units, this will cause a problem in keeping the new university housing projects paying for themselves. There needs to be a better effort to combat rising prices in Isla Vista apartment and home rents, instead of adding housing people do not want to really live in, other than maybe graduate students and some faculty.

K.H.

1) The increase in students by 1% per year will mean an increase in freshmen students. Currently freshmen do not have guaranteed on campus housing for the first year, which should be one of the housing goals for UCSB. The lack of on campus housing for freshmen students will only increase if there is not a plan to increase housing for them.

2) Section 4.10.1.1 lists areas outside of Santa Barbara and Goleta where “less than 6% of faculty and staff live.” Hope Ranch is included in the list, but the other unincorporated areas between Goleta and Santa Barbara and Montecito are not part of the list. Hope Ranch is part of the area between Goleta and Santa Barbara and does not fit with the list of other areas in Santa Barbara County.

P.S.

One of the things that I think should be addressed in this plan is the need for different types of housing. I feel that more single or double person apartments should be planned. I feel that these types of housing over larger homes that house anywhere from 6-12 people lead to the dirtiness and uncleanliness in Isla Vista and the surrounding area. With smaller apartments this area would be cleaner and easier to maintain.

T.W.

One thing that surprised me about the Environmental Impact report was that the environment wasn't protected in regards to conservation and preservation. They touched on what should happen and what would be the best for the environment but never specifically said how they were going to do that. The housing section showed that there are a lot of students that live on campus and a lot of grad students that don't have housing. It is good that they are planning for more grad students but I think they should look into the amount of students that live on campus, because overlooking such an influential aspect could really misconstrue data. If they plan IV for a certain amount of people and the amount of on-campus housing changes, there could be a
misrepresentation of people living in the two different areas. One other aspect that was surprising to me was that there were a lot more what’s than how’s. I was expecting to see steps for implementation and I never felt like they concluded, but rather left it almost open for suggestions. They stated what would be the most efficient things about a certain element but not how they would go about reaching it.

B.B.

1) In order to create housing for the proposed student increase of 5,000, where will the school find the necessary funding, considering that the state does not fund UC system housing?
2) How will the present economic situation, especially here in California, affect the goals of the UCSB LRDP and EIR?

B.R.

For the UCSB EIR, the plan indicated that there is a substantial growth since 2004 in dormitory occupancy, for the most part the growth is related to the availability of few housing dormitory the did not reflect an accurate direction in the housing trend. With the increase of student population, there are not enough parking spaces especially within Isla Vista. There also appear to have an displacement of low-income family housing within Isla Vista, rent prices are not regulated to accommodate the demands for housing which go against the goals of City of Goleta to provide affordable housing. Many of the existing housing units oftentimes indicate pesticide problems that require renovation or caring yet due to the lack of regulation the housing availability rates at a low level.

The county also posted a regulation on the building code in which no building higher than two stories are allowed within the area which worsen the housing situation in Isla Vista along with zoning codes. Overall, the plan indicates some complementary goals that are actually not in practice.

P.P.Y.C.

Being a student at the University of California Santa Barbara (UCSB) I want to see the university grow and prosper in a responsible way that does not leave a significant impact on the surrounding cities of Goleta and Santa Barbara. I understand that if the university wants to be a higher respected research university they need to attract more graduate students but this should not be done at the expense of the adjacent communities. When you add the expected growth from the city of Goleta and the projected growth of new students to the university, there will be more pressure put upon the sustainability levels of the central coast. These extra people will be driving to the super markets, downtown, back home, road trips, doing fun activities in the community. Even though this brings business to the area it will also affect the people that already live here. The traffic will begin to become more congested. If you drive from campus to Isla Vista and down Los Carneros you can see that the population is already having an impact on the community. Sometimes it takes 15 minutes to get from Hollister Avenue and Los Carneros, to El Colegio and Los Carneros. What will happen when you add more people to this situation? It’s going to be even worse. There are wetlands located on Los Carneros that are being affected by the noise and traffic. I think that UCSB needs to reevaluate what kind of growth they want and how much they want of it. If the growth still seems to be unavoidable then they need to figure out how to disperse the extra traffic and impacts put on the surrounding communities so they do not suffer. I do not believe that the ideas that UCSB has come up with are not sufficient
enough. There needs to be a strong relationship between the university and the city of Goleta to make sure that everyone’s needs are met the best as possible without creating more problems for the future.

C.C.

It is already widely known that one of the most prominent issues faced by the city of Goleta as well as the entire southern County of Santa Barbara is the desperate need for affordable housing, especially for the middle-class. In the Housing and Population portion of the EIR, I would like to have seen a thorough effort to assess the additional pressures that the implementation of the University’s Long Range Development Plan will place on the already dire situation of the region’s affordable housing deficit. I am aware that the LRDP as well as the Isla Vista Master Plan intend to increase affordable units in the Isla Vista community; however, a significant portion of the population growth induced by the LRDP (direct and indirect) will not desire to live in the Isla Vista community. This may be due to personal preferences, lifestyle incompatibilities, proximity to the workplace, or a variety of other miscellaneous factors. An additional threat to the affordable housing deficit in the region is posed by the possibility of the occurrence of LRDP Impact POP-3. The fact that the overflow from this anticipated impact would certainly place greater strain on the affordable housing calamity in the region provokes me to proclaim that this issue deserves a more adequate evaluation. Perhaps a more valiant effort to engage in a (dare I say) regional planning attempt needs to be pursued in order to understand these matters more thoroughly, and formulate an appropriate and comprehensive solution.

R.K.

I think that the housing quality in Isla Vista is a large issue that has not been paid enough attention. The EIR states that 40% of students live in the Isla Vista community. However some of the housing in this community is in need of some attention. Although this mostly deals with the various management companies that work with the students, there was not even a survey included in the EIR on what the quality of housing currently is. From personal experience and through my classmates I have heard stories of mold due to incorrectly built plumbing systems, poor insulation, and many other problems with their current living situations. I know that one of the goals is to improve housing while maintaining affordability, but I think specific standards need to be created for the housing situation in Isla Vista and I think that a survey should have been included to show what the housing quality is currently like.

The EIR states that it would eventually like to have a majority of students living in University housing. However, I believe that a majority of undergraduate students that live in the current campus housing are new transfers students and freshmen. In most cases, students enjoying living in the dormitories and campus apartments when they are new to the school, but they want the experience of living in the surrounding community of Isla Vista. I believe that research should be done to see what the age breakdown of the population living in current University housing is and also what kind of housing the current population is looking to move into in their following years attending UCSB. It might alter some of the plans the University has for meeting housing needs.

M.J.G

1. In the Housing and Population EIR, I believe it would have been beneficial to display data not only on where students, faculty, and staff live, whether it be on or off-campus, but also their
means for transportation to and from UCSB. Transportation and housing are two planning elements that go hand-in-hand, and I would have liked to know the percentages of people who drive to school, walk, bike, take the bus or train, use van pools, or commuter programs. Although I believe providing on campus housing is important to support the population growth of UCSB, it is also important to consider that people, especially those who may be homeowners, may not be interested in living on-campus but also need to be given the same consideration as far as their housing and transportation needs.

2. Although the EIR addresses the need for additional student and faculty housing on and off campus, there was no information on how the cost of living in a university-owned apartment or residence hall compares to the cost of other rentals in the area. Are they comparable in price, more costly, less costly? Presenting this additional information is helpful in understanding the reasons why people live where they do, and what changes to expect as growth at the university and in the surrounding areas continues.

M.L.G

1. My biggest concern with the UCSB LRDP is with the total lack of acknowledgement of the severe economic situation the state of California is in. It goes beyond the current, though temporary, national economic recession. It goes beyond a $16 million permanent budget cut for UCSB on top of a $450 million budget deficit. The fundamentals of the California economy (the piggy bank for the UCs) are nearing dire straights. Industries (and jobs) have fled the state and are continuing to flee to other states where there are more business friendly laws supports. Meanwhile, low income individuals are paying less taxes (if any at all) and accepting more handouts from the government, all the while reproducing at higher rates than those that are paying taxes, creating a heavy welfare drag. The physical limitations of climate change could also very likely halve agricultural production, if not deprive the whole of Southern California of potable water. I would be remiss if I failed to mention the newest socialist legislation like Assembly Bill 32 which is requiring a change to more strict air quality standards limiting economic growth.

To simply ‘decide’ to expand the Santa Barbara campus to create another UC flag ship is total hubris. The departments in existence are already showing signs of fatigue as many classes are no longer being offered and staff is becoming more part time (‘restructuring’ as they say). I say, stop all this talk of 5,000 more students by 2025 baloney! Invest in our current infrastructure! Invest in what we already have! UCSB won’t wither and die without “growth”. Spending on the fallacy of a brighter tomorrow is dangerous. Larger empires have fallen in an instant, and I feel UCSB is risking complete collapse by reaching too far beyond its own horizon.

2. I do agree with the technicals methods used in the report. The frequently cited Watkins Report out of the UCSB Economic Forecast Center takes many factors into consideration regarding population and job related growth. It concisely lays out (an opinion of) how growth would affect the surrounding neighborhoods. To some degree it could be argued that the Watkins Report is being used to justify the growth at UCSB.

I also liked the demographic breakdown of previous students and their housing/family situations. I discovered my situation – an undergraduate with children - occurs in less than 1% of the other living situations at UCSB. Yet, even though it is such a small percentage, I feel like I am important and cared about by the UCSB LRDP planners.
I think the various surveys used in the LRDP (like the Ellwood-Devereux Visiter Summary) show a thoughtful planning endeavor. It makes the plan both more user-friendly and informative. It makes it seem like this plan really is about the individual student.

L.T.

1. The report is missing detail; for example, it doesn’t include exact years and percentages. The report briefly mentions (p.21) the homeless and people with special needs. I believe that they are a small, yet important population of the community of Isla Vista who require more attention because of the possible impacts that could develop with an increase in population and modification of buildings, streets and parks.

2. There is no data regarding rooms for rent or converted garages, though I believe that they do deserve to be included in order to have an idea of their estimated occupancy and cost.

3. Information on San Clemente only shows the structure of the apartment buildings, the capacity of students and the number of parking spaces. No impacts have been included.

4. Due to state budget cuts, many programs and projects have been suspended or postponed. If UCSB continues to be low on funds, this will be a problem when it comes to paying the construction workers and staff.

5. Not all of the goals seem reasonable. For example, Goal #4- Maintain an appropriate balance between job-generating development and housing supply (p.20). This goal will be hard to accomplish because it will be very hard to accommodate the number of people that are projected to move to Santa Barbara. There is insufficient space for residential growth of this magnitude. Due to the shortage of housing, rent will be extremely high. The Goleta General Plan and the UCSB Long Range Development Plan both envision scenic vistas and protection of open space, but with the increase in faculty, students and staff, primary open-space will be in danger of being taken for the development of housing.

6. Negative impacts on displacement of current population need to be sufficiently addressed. The college and living experience of the community is very important.

I.R.

Currently, only 7 percent of students live outside of Goleta and Santa Barbara and drive in from neighboring cities such as Santa Maria, Lompoc and Carpentaria. I think that UCSB has excluded the possibility of promoting student enrollment from these areas. Since many jobs and low income housing are already established there, especially for families, one way for UCSB to promote enrollment without more development would be to provide adequate public transportation to and from these areas as they do already for faculty. Expansion of transportation would alleviate some strain on development in Goleta, while at the same time, promoting local enrollment from the county.

The city of Goleta is projecting 2000 additional housing units by 2020, while UCSB is projecting an enrollment growth of 5000 (with 5500 new bed spaces.) With this increased enrollment comes an increase in faculty, will UCSB be working with the city of Goleta to accommodate preferential housing for faculty, staff and their families? Only 41 percent of those 2000 additional units are very low and low-income housing. With such limited housing projected but high hopes for enrollment growth, there needs to be agreements made with the city to accommodate growth that UCSB expects.

M.A.
Within the Study Area, 4.10.1.1, the population section does not adequately address the Isla Vista populations generated in the student community of UCSB. It does not mention the transient community of Isla Vista. This group thrives because of the location in a temperate climate next to the beach and lack of action by residents. Isla Vista is full of students renting. They are not going to take the initiative to help fix the problem and neither are the landowners who do not live in Isla Vista. Another population not accounted for are the large, mostly Latino families living in cramped apartments on the far mountain side of Isla Vista. They are in Isla Vista because cramped housing and lack of regulation enable them to afford it. They also have a source of income from can collecting in a community of beer drinking college students. Although these populations are not direct products of the University, they are an indirect result of student living and affect the community of Isla Vista and UCSB.

There is also not sufficient data on informally rented rooms and converted garages. Many of these places are unsuitable to live in. There is not sufficient light, air, safe electrical wiring, or control of mold. A better policing system is needed to help prevent people being forced to live in these conditions for lack of more affordable options.

E.P.

One of the primary issues with the REIR for the Housing and Population section of UCSB’s LRDP is the considerable impacts this population increase will have on infrastructure within the University and its surrounding urban settings. The cities of Goleta and Santa Barbara are currently addressing issues related to decaying infrastructure, and with this increase in an already congested system of networks (most notably, roads and sewers), it will be likely that large-scale failures occur. To a degree, those impacts will be mitigated over time because of network maintenance and development. However, if new development is not planned pragmatically and effectively, there could be potentially large problems within the associated networks. Also, maintaining the growth management policies of Santa Barbara—a city that is essentially “built-out”—in regard to the expected population increase of UCSB, will likely cause issues of over congestion and lack of available housing. Santa Barbara already faces issues of housing availability, especially affordable housing, and this increase in demand for a virtually capped supply will only further exacerbate Santa Barbara’s housing problems.

M.C.

1. Consider reducing automobile parking to encourage alternative forms of transportation.
2. Consider investing in off-campus university housing to accommodate student growth and control rent in Isla Vista.

B.W.

1. What impact will the addition of 5000 students and 1700 new employees have on the discharge of effluent from the Goleta Sanitary District’s Treatment? Does the GSD have the capacity and funding to support all of the additional human discharge?

2. What impact will expanding employment and the student body have on UCSB's open spaces, specifically West Campus? Have there been any considerations of this nature?

B.C.

Dear University of California, Santa Barbara Campus Planning and Design,
I would like to thank you for your hard work on the long range development plan for UCSB. I am well aware that developing plans such as this take a large amount time and that it is not always easy to predict the future although I believe you have done an excellent job. As I was reading through the plan I had a few comments, which I thought maybe important to bring to your attention. I believe that the university should address upcoming and take into account the developing economic time. As the economy begins to falter, I believe it is a highly ambiguous goal for the university to increase its student population by 5,000 students and provide housing for those students. The increase in students will mean more crowded bike paths, walkways, facilities, and classrooms all of which are already stressed to the max. The university has already displayed that it does not have the necessary means to pay for the infrastructure improvements that will be needed to provide for the increase in students by chipping away at student funded programs. Hence I believe that the development rate for the university needs to be scaled back in order to fix the current problems that plague the campus. Thank you for your consideration.

M.D.

Q1: If the student population were to grow by 5000, does the local hotel industry have the rooms and resources to accommodate additional visiting families that come from out of town and swell the campus population during June Commencement?

Q2: What does the school plan to do with the increased usage of electronic networks and the increased use of library materials? If the population of students were to grow, wouldn’t they too be using the same servers and databases as the previous student population? What changes or measures are being taken to ensure that the quality of these resources is preserved?

F.H.

- According to the plan, UCSB intends to build high density undergraduate housing along Ocean Road on the border of Isla Vista and campus. The buildings will be seven stories tall, and will basically act as a buffer or wall between IV and UCSB. Also, there is no plan to mitigate for the loss of the bike path, pedestrian walkway, and tunnel connecting IV to the UC.

- In addition to the loss of the bike and pedestrian corridor, numerous eucalyptus trees will be removed. Even though these trees are not native to California, they have thrived here for many years and have given a unique atmosphere to that area. They are also known as habitat for migratory species of butterflies like the monarch not to mention other wildlife including raccoons and birds.

C.R.
Response to Comment R-29-1. Please see Master Response - Population and Housing regarding induced growth.

Pursuant to CEQA, the EIR analyzes and identified mitigation for impacts to the physical environment. Providing housing in the City of Goleta would not address such impacts and is therefore beyond the scope of the present environmental review.

Response to Comment R-29-2. CEQA requires the EIR to analyze the proposed LRDP's physical impacts on the environment. The number of students occupying rooms in residence halls is not such an impact, nor is the LRDP's effect on University recruiting. The LRDP would provide housing for all additional population, including students and faculty and staff, added pursuant to its planned enrollment growth.

Response to Comment R-29-3. Please see the response to R-192.

Response to Comment R-29-4. Please see the response to comment R-29-2.

Response to Comment R-29-5. The LRDP will provide on-campus housing for all additional students, faculty, and staff added pursuant to its planned enrollment growth.

Response to Comment R-29-6. Please see pages D.10 to D.15 of the LRDP for information on the range of housing units planned. Units include studios, 1, 2, and 3 bedroom apartments; 2 and 3 bedroom townhouse units, dormitories, family student units, and single-family homes.

Response to Comment R-29-7. The LRDP is a development program, and the EIR analyzes its impacts at a programmatic level. As specific projects are proposed, they will be subject to environmental review under CEQA and project-specific mitigation measures will be identified and adopted where appropriate.

Response to Comment R-29-8. CEQA requires the EIR to analyze the proposed LRDP's physical impacts on the environment. Funding issues are not such impacts.

Response to Comment R-29-9. Comments noted.

Response to Comment R-29-10. Comment noted.

Response to Comment R-29-11. Comment noted.

Response to Comment R-29-12. CEQA requires the EIR to analyze the proposed LRDP’s physical impacts on the environment. The quality of housing in Isla Vista is not such an impact; nor is it within the University's authority to remedy.

Response to Comment R-29-13. See Table 4.13-25 in the recirculated Transportation Section for commuting characteristics of students, faculty, and staff.

Housing cost issues are discussed in Impact POP-3.

Response to Comment R-29-14. Comments noted.
Response to Comment R-29-15. The comment appears to refer to the LRDP itself, which is not an environmental review document prepared under CEQA, but a broad program for long range development. Regarding impacts related to population and housing, please see Master Response – Population and Housing.

Response to Comment R-29-16. The LRDP will provide on-campus housing for all additional students, faculty, and staff added pursuant to its planned enrollment growth.

Response to Comment R-29-17. CEQA requires the EIR to analyze the proposed LRDP's physical impacts on the environment. Social and economic issues are not such impacts.

Response to Comment R-29-18. Regarding housing issues please see Master Response - Population and Housing. Regarding infrastructure, please see DEIR sections 4.11 (Public Services) and 4.16 (Other Utilities), along with RDEIR sections 4.14 (Water Supply) and 4.15 (Waste Water).

Response to Comment R-29-19. Please see response to comment I-8-4 regarding proposed parking restrictions.

The LRDP will provide on-campus housing for all additional students, faculty, and staff added pursuant to its planned enrollment growth. No off-campus housing is required to accommodate that growth.

Response to Comment R-29-20. For a discussion of impacts related to wastewater, please see the recirculated wastewater section (4.15) of the RDEIR. In particular, please see the discussion for Impact WW-1. The impact statement for that discussion is repeated here (p.4.15-8):

LRDP Impact WW-1: Implementation of the 2010 LRDP will increase wastewater flows to the Goleta Wastewater Treatment Plant via conveyance systems owned by the University, the Goleta Sanitary District (GSD), and the Goleta West Sanitary District (GWSD). Buildout of the 2010 LRDP, along with buildout of projected development within the service areas of the three agencies would result in the following:

1. The total design capacity of the treatment plant would not be exceeded.
2. The portion of the total design capacity of the treatment plant owned by the University would be exceeded.
3. The permitted capacity owned by the University under the GSD’s NPDES permit would be exceeded.
4. The portion of the total design capacity of the treatment plant owned by the Goleta Sanitary District would not be exceeded.
5. The permitted capacity owned by the GSD and under the GSD’s NPDES permit would be exceeded.
6. Neither the treatment plant design capacity nor the permitted capacity owned by the GWSD under the GSD’s NPDES permit would be exceeded.

Significance: Significant

LRDP Mitigation WW-1A: The University will request that the Goleta Sanitary District and Goleta West Sanitary District apply to the Regional Water Quality Control Board to modify or re-issue each District’s National Pollution Discharge Elimination Permit for the wastewater treatment plant as necessary to accommodate the average annual enrollment growth rate for the University.

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4 The University’s stated intention for buildout of the LRDP is to accommodate an average annual enrollment increase of about 1 ½ % per year, which translates into roughly 300 additional students per year. See DEIR at p. 3-20.
LRDP Mitigation WW-1B: The University will negotiate the acquisition of additional design capacity in the Goleta Sanitary District wastewater treatment plant as necessary to accommodate the average annual enrollment growth rate.

Residual Significance: Significant and unavoidable.

Please see Sections 4.12 (Recreation), and 4.3 (Biology) for discussions on impacts to open space, recreation, and biologically sensitive areas.

Response to Comment R-29-21. The LRDP proposes classroom and infrastructure development to accommodate the planned enrollment growth.

Response to Comment R-29-22. CEQA requires the EIR to analyze the proposed LRDP’s physical impacts on the environment. Hotel capacity and electronic library materials do not relate to such impacts.

Response to Comment R-29-23. LRDP Mitigation TRAFFIC-7 commits the University to implement bicycle improvements identified in the LRDP and to maintain the Campus’s bicycle circulation system. The DEIR discusses eucalyptus windrows on p. 4.3-5:

“Large windrows are present on Main Campus at Ocean Road, El Colegio Road, and between Phelps Hall and the Lagoon. Storke Campus has a small windrow along the southern edge of the Stork Wetland, and a large windrow is present along the western border of North and West campuses. Specific locations are shown on Figure 4.3-1. The eucalyptus windrows along the western border of the North and West Campuses contain a Monarch butterfly aggregation area near Devereux Creek (Meade 1999, URS 2004), and provide white-tailed kite nesting areas (URS 2004). Trees used by Monarch butterflies, or that contain active raptor nests are considered sensitive by state and federal agencies.”

The Ocean Road windrow does not include a Monarch aggregation site. No projects are proposed on, or near, properties with identified monarch butterfly aggregation sites (see Figures 4.3-1 and 4.3-2, in comparison to Figure 3-9.)
-----Original Message-----
From: UCSB Vision [mailto:info@ucsbvision2025.com]
Sent: Thursday, March 26, 2009 6:56 PM
To: 'Rick Frickmann'
Subject: RE: Possible errors in Tables 4.2-20 and 4.2-21 of Recirculated DEIR

Thank you for your comments/questions regarding the UCSB Long Range Development Plan. Your correspondence will be entered into the record and addressed within the formal response that will follow after the public comment period closes on 3/31/2009. If you would like to receive notice of future meetings and/or report releases and are not currently on our mailing list, please register on the project Web site, http://www.ucsbvision2025.com/contact.html. We appreciate your interest in UCSB.

-----Original Message-----
From: Rick Frickmann [mailto:rfrickmann@cox.net]
Sent: Monday, March 23, 2009 10:22 AM
To: info@ucsbvision2025.com
Subject: Possible errors in Tables 4.2-20 and 4.2-21 of Recirculated DEIR

Dear Mr. Simpson,

I believe there may be typographical errors in Table 4.2-20 of the Recirculated DEIR. In the columns “Emissions Without Housing” and “Emissions With Housing” the first 10 rows have the same values. It is highly unlikely that the added housing would use no electricity or natural gas. Since the “TOTAL EMISSIONS” for the “Emissions With Housing” column does not add correctly, this suggests to me the wrong numbers were entered in the that column.

Table 4.2-21 may be incorrect as well. The values in its last column are calculated from the last column in Table 4.2-20. If the 4.2-20 values are wrong as I suspect, then the 4.2-21 values are also wrong.

Sincerely,

Richard Frickmann
Letter R-30
Richard Frickmann (1)

3/23/2009

Response to Comment R-30-1. Please see responses to comment R-27-2.
-----Original Message-----
From: UCSB Vision [mailto:info@ucsbvision2025.com]
Sent: Thursday, March 26, 2009 6:56 PM
To: 'Frank Kinnaman'
Subject: RE: UCSB GHGP

Thank you for your comments/questions regarding the UCSB Long Range Development Plan. Your correspondence will be entered into the record and addressed within the formal response that will follow after the public comment period closes on 3/31/2009. If you would like to receive notice of future meetings and/or report releases and are not currently on our mailing list, please register on the project Web site, http://www.ucsbvision2025.com/contact.html. We appreciate your interest in UCSB.

-----Original Message-----
From: Frank Kinnaman [mailto:fkinnaman@gmail.com]
Sent: Monday, March 23, 2009 11:09 AM
To: info@ucsbvision2025.com
Subject: UCSB GHGP

Hello,
I am a member of the UCSB Greenhouse and Garden Project. We are of course over near los carneros, behind the soccer fields/Harder Stadium. I have just done some surface skimming of the LRDP and missed the meeting. However an illustration on the "Ocean Road Pattern Book" is alarming me a little. I am attaching it here and the gardens look like they are kind of obliterated but I can't really tell. Will the LRDP affect the GHGP??

thank you in advance for the response.

<< Picture 2>>
Letter R-31
Frank Kinnaman

3/23/2009

Response to Comment R-31-1. The LRDP does not propose new structures in the vicinity of the Greenhouse and Garden Project (see page D.6 of the LRDP).
Monday March 23, 2009

Mr. Tye Simpson  
University of California  
Office of Campus Planning and Design  
c/o Vision 2025  
Santa Barbara, CA 93106-1030


Dear Mr. Simpson,

Heal the Ocean (HTO) has reviewed the Recirculated Draft Environmental Impact Report (RDEIR) for the University of California at Santa Barbara (UCSB) 2008 Long Range Development Plan (LRDP) dated February 8, 2009.

General Comments
UCSB Campus Planning and Design is proposing an immense program of infrastructure upgrades. Campus wastewater is treated at the Goleta Wastewater Treatment Plant, which is operated by the Goleta Sanitary District (GSD). Heal the Ocean was instrumental in the campaign for the upgrade of the Goleta Sanitary District Wastewater Treatment Plant to full secondary levels, and GSD is in the process of engineering and construction to be completed five years from now, by 2014. We are familiar with GSD’s designed capacity, as well as the relationship of GSD to Goleta West Sanitary District (GWSD), which uses GSD’s facility and ocean outfall for wastewater discharge.

The RDEIR cites dramatically increased wastewater flows from both GSDW and GSD, yet maintains that no mitigation is necessary, and further engineering work or Environmental Impact Report (EIR) is not required. Heal the Ocean strongly disagrees. The RDEIR (4.14-25 Clean Water Act) states, “The University is responsible for compliance with regulations associated with the Clean Water Act and any other applicable federal environmental laws regarding location, type, planning, and funding of facilities.” The Clean Water Act sets forth federal water quality standards that apply to sanitary sewer service, and the expected population increase at the University is guaranteed to have a profound impact on the sanitary sewer collection system. The LRDP exceeds wastewater treatment requirements of the applicable Regional Water Quality Control Board (RWQCB), and is considered significant under the California Environmental Quality Act (CEQA) guidelines.
Wastewater Capacity

The RDEIR (4.15-11) states, “The Goleta Sanitary District and Goleta West Sanitary District Land Use Survey/Wastewater Generation Projections Study 2006 Update (Dudek and Associates, Inc., 2006) quantifies future wastewater flow through both the GSD and GWSD systems associated with buildout of land uses within their service areas other than the University.” Based on the Dudek study the RDEIR (4.15-13 and Table 4.15-5) states the following:

- “Cumulative wastewater flows for the GSD will fall within the treatment plant’s design capacity, but will exceed the remaining National Pollutant Discharge Elimination System (NPDES) capacity at buildout of other land as well as buildout of that portion of the 2008 LRDP that falls within the District;
- “Cumulative wastewater flows associated with UCSB will exceed the University’s remaining share of the treatment plant design capacity and remaining share of NPDES permit capacity at buildout of the 2008 LRDP.”

The LRDP Impact WW-1 (4.15.2.3 2008 LRDP Impacts and Mitigation Measures) states that the “implementation of the 2008 LRDP will increase wastewater flows to the Goleta Wastewater Treatment Plan via conveyance systems owned by the University, GSD and GWSD. Buildout of the 2008 LRDP, along with the buildout of projected development within the service areas of the three agencies would result in the following:

- “The total design capacity of the treatment plant would not be exceeded;
- “The portion of the total design capacity of the treatment plant owned by the University would be exceeded;
- “The permitted capacity owned by the University under GSD’s NPDES permit would be exceeded;
- “The portion of the total design capacity of the treatment plant owned by the GSD would not be exceeded;
- “The permitted capacity owned by GSD under GSD’s NPDES permit would be exceeded;
- “Neither the treatment plant design capacity nor the permitted capacity owned by the GWSD under the GSD’s NPDES permit would be exceeded.”

The LRDP Mitigation WW-1A (4.15.2.3 2008 LRDP Impacts and Mitigation Measures) states:

- “The University will request that the GSD and GWSD apply to the RWQCB to modify or re-issue each District’s National Pollution Discharge Elimination Permit for the wastewater treatment plant as necessary to accommodate the average annual enrollment growth rate for the University.”

The LRDP Mitigation WW-1B (4.15.2.3 2008 LRDP Impacts and Mitigation Measures) states:

- “The University will negotiate the acquisition of additional design capacity in the GSD wastewater treatment plant as necessary to accommodate the average annual enrollment growth rate.”

The GSD and GWSD must acquire a re-issued NPDES permit for the wastewater treatment plants to accommodate for the population growth of the University before the LRDP is approved. The RDEIR states that the GSD commented on the Draft EIR which states (4.15-14), “(GSD) does not believe that it is prudent to sell any of its remaining treatment plant
capacity based on the projection of future capacity in the January 2006 Dudek and Associates report.” The RDEIR does not state if GWSd intends to sell treatment plant capacity to the University. The University cannot assume GSD and/or GWSd will sell additional treatment plant capacity to the University to accommodate the population growth. It is the responsibility of the University to finalize negotiations with GSD and/or GWSd to buy additional treatment plant capacity before the LRDP is approved and to follow CEQA guidelines as it pertains to the environmental impact the LRDP is initiating.

Sincerely,

Stephanie Mutz, HTO Science & Policy Analyst
Hillary Hauser, Executive Director

cc: Joseph Centeno
    Salud Carbajal
    Janet Wolf
    Doreen Farr
    Joni Gray
Letter R-32
Heal the Ocean

3/23/2009

Response to Comment R-32-1. Please see response to comment R-21-18.
March 23, 2009

Re: Comments on the Recirculated Draft EIR. Air Quality

Dear Mr. Simpson,

The LRDP DEIR should be put on hold until 2010 because:

- New CEQA greenhouse gas (GHG) Guideline will be available January 2010
- SB County Air Pollution Control Dist. will have a local GHG inventory in 2010
- The LRDP is one of the largest development projects in Santa Barbara County
- It will be constructed after the new CEQA Guidelines take affect
- It will have many new sources of GHG
- These GHG sources will last many years into the future
- And GHG emissions are recognized as a critical world wide problem

After the updated CEQA and local GHG inventory are available, a thorough summary of the new Impacts and Mitigation Measures using up-to-date data can then be incorporated into the EIR.

Proposed CEQA Guidelines that would affect the LRDP are in Appendix G:

VII. GREENHOUSE GAS EMISSIONS -- Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, based on any applicable threshold of significance?

b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

For the LRDP the answer to a) above is yes, because “any applicable threshold of significance” includes ”zero threshold”, and the answer to b) is also yes, because the project would add GHG emissions while AB-32 and other state laws try to reduce GHG emissions. Therefore the LRDP would have a significant environmental impact due to GHG emissions and under the new guidelines it would be subject to mitigation.
On the “zero threshold” approach, the California Air Pollution Control Officers Association (CAPCOA) comments “A zero threshold approach is based on a belief that, 1) all GHG emissions contribute to global climate change and could be considered significant, and 2) not controlling emissions from smaller sources would be neglecting a major portion of the GHG inventory.”

{http://capcoa.org/CEQA/CAPCOA White Paper.pdf}

Flaw in the current LRDP DEIR GHG analysis:

AB-32 requires California GHG emissions to be lowered to the 1990 level by 2020.

The LRDP DEIR (Section 4.2 p.52) argues this would amount to a 30% reduction from projected business-as-usual (BAU) levels, so if they reduce their proposed GHG emissions by 30% from the amount they could have produced if the law was not in effect, they would be in compliance (Section 4.2 p.63). This argument neglects the immense installed base of California GHG sources. UCSB's method of calculation is valid only if all existing GHG sources were dismantled and rebuilt to the 30% less standard.

Other EIRs have recognized this flawed logic and determined that any increase at all in greenhouse gases above existing levels is a significant impact under CEQA {Marin Countywide Plan Update DEIR, 2007; San Diego Assoc of Governments Regional Transportation Plan DEIR, 2007; and California State Lands Commission, Venoco Ellwood Full Field Development Project EIR}.

To comply with the intent of AB-32, UCSB should in fact be reducing their combined existing and proposed GHG emissions by 30%. Instead, they propose to increase campus non-vehicle emissions by 28%. And on top of that, add emissions from increased traffic.

Why GHG emissions must be reduced:

The DEIR correctly points out the dire worldwide consequences of climate change (Section 4.2 p.43). Closer to home California agriculture and the water supply from the Sierra snowpack which both come to Santa Barbara County would be impacted.

After the 1990 levels are reached in 2020, the California Air Resources Board will require another 80% reduction below 1990 levels to be reached by 2050, meaning the resulting LRDP emissions would become an even bigger part of the GHG problem.

And those 2050 emission levels may still be too high. The policies of AB-32 were based on information from the United Nations Intergovernmental Panel on Climate Change (IPCC) which recommended that atmospheric levels of GHG be stabilized
around 450 parts per million (ppm) by 2050. Since then, many scientists conclude that
the 450 ppm level will not be enough, and we really need to reduce GHG to 350 ppm to
avoid irreversible harm to the global environment.


**Mitigations**

More than half the LRDP total GHG emissions increase would be from private vehicle
use. The LRDP has tried to reduce those emissions by including on campus housing and
designing for bicycles and public transportation. To **LRDP Mitigation AIR-1A** add:
“build housing for students/faculty before enrollment increases” and “provide electric
shuttle buses to common nearby destinations.”

As for the non-vehicle emissions, to **LRDP Mitigation AIR-1B** add: “any new
construction shall only use energy for heating or electricity generation from non-carbon
based fuels and this energy shall be from renewable sources installed and paid for by this
project.” This is not unrealistic. Grid tied roof top or off-site solar electric generation
and heat pumps/geothermal heating are feasible readily available existing technologies.

**What is expected from the University of California Santa Barbara**

UCSB is a world class intuition with a world renowned School of Environmental
Science; as such it should be leading by example and have a LRDP with a zero net
increase of GHG. The University’s own Campus Sustainability Plan goal SP-3 is “strive
to climate neutral campus through energy efficiency, conservation, on site generation and
strategic procurement of clean and renewable energy.

The State of California is committed to lowering GHG. As a state funded institution,
UCSB must do everything possible to assist the state in that effort.

In closing I want to say as a UCSB graduate I am proud of the contribution UCSB
makes to Santa Barbara and I want it to be the best possible campus ever.

Thank you for the opportunity to comment,

Richard Frickmann
Letter R-33
Richard Frickmann (2)

3/21/2009

Response to Comment R-33-1. The EIR analyzes effects of the project (the University’s 2010 LRDP) in the environmental and regulatory context at the time of the Notice of Preparation. The NOP was circulated on May 23, 2007. The standards of significance used in the RDEIR are consistent with and derived from the standards and goals adopted by the California Legislature in AB 32, by the California Air Resources Board (the agency charged with administering the state’s GHG emissions reduction program), and the California Air Pollution Control Officers Association, and are therefore appropriate for determining the significance of the LRDP’s contribution to global climate change.

Response to Comment R-33-2. The RDEIR determines the significance of the LRDP’s contribution to global climate change by comparing the GHG emissions attributable to development under the LRDP as proposed to the emissions that would result from a “business as usual” scenario in which the LRDP is developed without on-campus housing for all additional students and employees. As explained on RDEIR pages 4.2-51 and 52, AB 32 sets a statewide goal of reaching 1990 emissions levels by 2020. The California Air Resources Board, the state agency charged with administering AB 32’s emissions reductions programs, has determined that meeting this goal requires a 30% reduction in emissions from a “business as usual” scenario, in which emissions continue to grow along the current trajectory; neither AB 32 nor CARB’s guidance requires a 30% reduction below current emissions levels.

Accordingly, the RDEIR adopts as its standard of significance an emissions level 30% below business as usual. The LRDP as proposed results in a 43% emissions reduction from the “business as usual” scenario, and thus does not make a cumulatively considerable contribution to global climate change. The LRDP’s impacts related to climate change are thus less than significant and no mitigation is required.
illegal to cut down these trees?

if federal and state laws are being broken WHY ARE YOU TELLING US? alert the authorities that ENFORCE THESE LAWS!!! otherwise i doubt many people will even believe you, and will think this email is alarmist, and designed to impress upon gullible, naive undergrads with no real understanding of what you're talking about. i'm skeptical, even, and i'm on your side.

if it's illegal, don't waste your time sending emails, go tell the fucking police!!!!!

otherwise, it's probably not ILLEGAL, it's just WRONG, and so let's organize protest or something.

wtf?

max
Letter R-34
Max Golding
3/7/2009

Response to Comment R-34-1. Comments noted.
Thank you. Your comments will be addressed in the Final EIR.

Dear UCSB Planning Staff:

My wife and I own 6500 Del Playa Dr. This is the first home next to campus on the mountain side of Del Playa. We are very concerned about the plans to build residences along Ocean Rd. which would be contiguous to our property and all Isla Vista properties along Ocean Rd. abutting campus.

The plans appear to be to shove the housing as close to the campus boundary abutting Isla Vista as possible. This does not fit into the orientation and design of homes abutting the University. This does optimize the land available to UCSB at the expense of properties built 10-40 years ago in Isla Vista. This self-serving design does not make UCSB a good neighbor, but rather just another opportunistic developer.

Sincerely,

Brian and Terri Bailey
280 King Daniel Ln.
Goleta, CA 93117
Response to Comment R-35-1. This impact is discussed in Impact AES-3, on page 4.1-33 of the DEIR. The following is an excerpt of the mitigation provided therein:

**LRDP Mitigation AES 3A:** Prior to approval of development projects along Ocean Road under the 2010 LRDP, the UC Santa Barbara Design Review Committee shall review project designs for:

- Protection of views to coastal and mountain resources from viewpoints on Ocean Road, roadways within Isla Vista, and along El Colegio Road.

- Campus development and design along Ocean Road respecting the adjacent Isla Vista neighborhood in terms of scale, proportion, appearance, and solar access, as well as maximizing views to the Pacific Ocean.

- Landscaping associated with project development and design along Ocean Road not blocking views of the ocean or hills.

With the implementation of this mitigation measure, development under the LRDP will have a less than significant impact on scenic vistas along Ocean Road.
Hi Courtney,

The project team leaders will take that into consideration and forward your comment to the traffic engineer, but we will respond formally at the end of the review period. Thanks.

Greetings,
As I am reading through the Transportation Section of the recirculated Draft EIR I am wondering if the Project descriptions were switched. On 4.13-75 "LRDP Traffic Modeling Scenarios" the No Project Condition includes the widening of El Colegio Road whereas the Plus Project Condition excludes it. Are these perhaps switched, as subsequent Projects with the title "Plus" include the widening of El Colegio?

Thanks!
Courtney

--
Courtney Dietz
COAST
Director - Santa Barbara Walks
Letter R-36
COAST

2/18/2009

Response to Comment R-36-1. Both the no project and plus project modeling scenarios included Phase 1 of the El Colegio Widening Project, which has widened El Colegio Road to 4 lanes between Los Carneros Road and Stadium Road.
Thank you for commenting on the recent notice regarding the recirculation of several chapters of the DEIR for the UCSB LRDP. Your comments have been forwarded to the project team leaders. You also indicate interest in reading the EIR's material on cultural and biological resources. We have uploaded pdfs of the entire document on the project Web site, www.UCSBVision2025.com. Please let me know if you need further information.

This is very gracious that UCSB is recirculating these chapters for comment. The problem that I see with UCSB is their failure to notify the native American community, and not just as the public, but as a sovereign nation. I feel that this has a sign of disrespect and irresponsible on the part of UCSB.

I would request that UCSB contact the native Americans that have more than just a personal interest in this matter. After all, your university is sitting atop one of our villages. We would like to see what your EIR says about cultural and biological resources. I would like to comment on those items as well.

Freddie Romero
688-7997  X37
805-403-2873
Letter R-37
Freddie Romero

2/12/2009

Response to Comment R-37-1. Cultural resources are discussed in Section 4.4 of the EIR. Biological resources are discussed in Section 4.3. Each section includes a discussion of existing environmental conditions, regulatory context, and potential impacts. The Campus sent letters requesting input on cultural resource impacts to each of the nineteen individuals and organizations identified by the California Native American Heritage Commission as potentially having knowledge of such resources in the project area. See DEIR at p. 4.4-18.

The DEIR identifies extensive mitigation measures that would reduce impacts to cultural resources to a less than significant level. See DEIR at pp. 4.4-23 through 36.
Thank you for commenting on the UCSB Long Range Development Plan. We appreciate your interest and have forwarded your comments to the project team leaders.

1.) build your own wastewater treatment plant and build your own desalination plant. The community will then love you and allow you to do almost anything.

Don Miller
Letter R-38
Don Miller

2/13/2009

Response to Comment R-38-1. Regarding the proposal to build a waste water treatment plant, please see response to comments R-21-18.

Regarding the proposal to build a desalination plant, the RDEIR concludes that with the application of identified mitigation measures, growth under the LRDP will a less than significant impact related to water supply. No further mitigation is required.
March 30, 2009

Tye Simpson
University of California
Office of Campus Planning & Design
c/o Vision2025
Santa Barbara, CA 93106-1030

Re: Draft Environmental Impact Report, Recirculated Sections
Vision 2025 – UC Santa Barbara Long Range Development Plan, SCH No. 2007051128

Dear Mr. Simpson:

The Santa Barbara County Air Pollution Control District (APCD) has reviewed the revised air quality section, as well as the additional climate change/greenhouse gas emissions analysis, associated with the Draft Environmental Impact Report (DEIR) for the above-referenced project. In general, APCD concurs with the findings made in the DEIR with respect to significance under the California Environmental Quality Act (CEQA). However, APCD staff offers the following comments regarding the air quality and climate change analyses and proposed mitigations:

Section 1.0, Introduction and Summary:

1. Section 1.4, Summary of Impacts and Mitigation Measures: The impacts and mitigation measures that are presented in Section 4.2.3, Climate Change, should be added to the Introduction and Executive Summary portions of the EIR.

2. Section 1.4, Summary of Impacts and Mitigation Measures, 4.2, Air Quality, Impact AIR-1: Air quality impacts under this issue area were found to be significant and unavoidable after mitigation was applied. As required by CEQA Guidelines Section 15126.4.a.1., An EIR shall describe feasible measures which could minimize significant adverse impacts, including where relevant, inefficient and unnecessary consumption of energy. Mitigation Measure AIR-1B includes a reference to energy efficiency measures for new buildings, but does not address energy efficiency measures for existing buildings and operations to reduce air quality impacts. Mitigation Measure AIR-1B should be revised to include energy conservation measures for existing buildings and operations, and these mitigation measures should be incorporated into UCSB’s Long Range Development Plan (LRDP)(CEQA Guidelines Section 15126.4.a.2).

3. Section 1.4, Summary of Impacts and Mitigation Measures, Impact AIR-3: Air quality impacts related to construction activities were found to be less than significant with mitigation incorporated. However, Mitigation Measure AIR-3A does not include a number of regulatory requirements that apply to construction equipment and operations. The following measures...
should be incorporated into Mitigation Measure AIR-3A, as they apply to all construction activities that take place under the LRDP:

a. All portable diesel-fired engines rated at 50 brake-horsepower or greater must have either statewide Portable Equipment Registration Program (PERP) certificates or APCD permits prior to operation. Engines with PERP certificates are exempt from APCD permit, provided they will be on-site for less than 12 months. For more information about the PERP program, refer to the California Air Resources Board (CARB) website at www.arb.ca.gov/portable/portable.htm.

b. Portable engines rated at 50 brake-horsepower or greater must meet specific emissions requirements as outlined in the Air Toxic Control Measure (ATCM) for Diesel Particulate Matter from Portable Engines (17 CCR § 93116). The ATCM requires cleaner burning engines to be phased in based on their “tier”, which is determined by a number of factors. Engines rated as “Tier 0” are phased out beginning January 1, 2010. APCD recommends the use of Tier 1 engines at a minimum, and the use of Tier 2 engines or greater to the maximum extent feasible. For more information, refer to the California Air Resources Board website at http://www.arb.ca.gov/regact/2007/perp07/froatcm.pdf.

c. Fleet owners of mobile construction equipment are subject to the CARB Regulation for In-use Off-road Diesel Vehicles (13 CCR Chapter 9, § 2449), the purpose of which is to reduce diesel particulate matter (PM) and criteria pollutant emissions from in-use (existing) off-road diesel-fueled vehicles. For more information, please refer to the CARB website at http://www.arb.ca.gov/msprop/ordiesel/ordiesel.htm.

d. Idling of heavy-duty diesel trucks during loading and unloading shall be limited to five minutes; auxiliary power units should be used whenever possible. State law (13 CCR Chapter 10, § 2485) requires (with some exceptions) that drivers of diesel-fueled commercial vehicles weighing more than 10,000 pounds:

- Shall not idle the vehicle’s primary diesel engine for greater than 5 minutes at any location,

- Shall not operate a diesel-fueled auxiliary power system (APS) to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5 minutes at any location when within 100 feet of a restricted area (homes and schools).

4. Section 1.4, Summary of Impacts and Mitigation Measures, Impact AIR-4: Mitigation Measure 4C proposes a per-project emission limit over which additional diesel PM and nitrogen oxides (NOx) mitigations would be required, using Table 4.2-13 of the DEIR (per-project emissions of 2,365 pounds of diesel PM per year). This mitigation measure requires a project-by-project analysis to determine required mitigation, and includes some measures that are already required by state law (items 3 and 7). Measures that are required by state law cannot be
overlooked based on a project-level emissions analysis, as is proposed. Other measures (items 2, 6, 8 and 9) are more flexible and are written in such a way that they can applied to all projects and modified as appropriate for specific projects. Therefore, APCD staff recommends revising Mitigation Measure 4C by deleting the 2,365 pounds diesel PM/year emissions limit, and requiring the measures for all construction activities. Because the university houses a relatively large population of students, faculty and staff, the mandatory application of all of these measures would more effectively protect public health during construction activities.

Section 4.2, Air Quality:

5. Table 4.2-1, Air Quality Standards, Page 4.2-6: Attainment status for the federal lead standard is listed as “U”, or undefined, as stated in footnote number 3 of the table. This statement is repeated in the second sentence of the first paragraph on Page 4.2-12. Santa Barbara County is considered to be “unclassified” with respect to the revised federal lead standard of 0.15 μg/m³.

6. Table 4.2-2, Historic Pollutant Levels, Page 4.2-7: This table should be updated to include data for more recent years. Data for 2006, 2007, and 2008 are available at the CARB website at www.arb.ca.gov/adam/welcome.html. Also, this table should be revised to include the number of days the state 8-hour ozone standard was exceeded.

7. Section 4.2.1.5, Regulatory Context, 2007 Clean Air Plan, Page 4.2-11: The first sentence of the third paragraph in the discussion of the 2007 Clean Air Plan states that “…the region does not meet the state one-hour ozone standard…”. Currently, Santa Barbara County is considered in attainment of the state 1-hour ozone standard, but does not meet the state 8-hour ozone standard of 0.070 ppm.

8. Section 4.2.2.3, LRDP Impacts and Mitigation Measures, LRDP Mitigation AIR-1B, Page 4.2-24: This mitigation measure should include energy conservation measures for existing buildings and operations, as described in comment number 2 of this letter.

9. Section 4.2.2.3, LRDP Impacts and Mitigation Measures, LRDP Impact AIR-3, Page 4.3-32: This section should discuss compliance with the National Emission Standards for Hazardous Air Pollutants – Asbestos (referred to as the Asbestos NESHAP). The Asbestos NESHAP includes notification and removal requirements that apply to demolition and renovation activities occurring at the university.

10. Section 4.2.2.3, LRDP Impacts and Mitigation Measures, LRDP Impact AIR-3, Page 4.3-33: The fourth sentence of the second paragraph on this page states that the construction emissions analysis was done assuming SBCAPCD emission reduction measures for fugitive dust and construction equipment would be implemented (diesel particulate filters and diesel oxidation catalysts in all construction equipment). This is inconsistent with Mitigation Measure AIR-4C, which states that mitigation should be applied only when diesel PM emissions exceed 2,365 pounds per year, per construction project. As suggested in comment number 4 of this letter,
APCD staff recommends that Mitigation Measure AIR-4C be applied to all construction projects.

11. Section 4.2.3.5, Guidance for Evaluating Climate Change Impacts Under CEQA, Page 4.2-55: Towards the bottom of Page 4.2-55, thresholds of significance for greenhouse gas (GHG) emissions are presented. These thresholds should be presented more prominently. APCD staff suggests that the discussion indicate that these are interim thresholds that have been chosen by the university (CEQA lead agency) as appropriate for the subject project, in the absence of any adopted statewide thresholds of significance. It should be noted that the percent emissions reduction goals of Assembly Bill 32 (AB32), stated as a 30% reduction from “business as usual” (BAU), is a reduction of both existing and proposed operational emissions, not just emissions from new development projects. As such, the AB32 percent reductions call for a much greater reduction in tons per year of GHGs than if they were to apply only to new development projects.

12. Section 4.2.3.5, Campus Greenhouse Gas Emissions, Page 4.2-59: The first paragraph following Table 4.2-20 on this page, second sentence, states, “Nevertheless, the housing proposed for development under the LRDP will result in GHG emissions reductions which are greater than 30% below business as usual. Thus, the project incorporates features that will reduce GHG emissions to levels which are less than the significance threshold.” As noted in the previous comment (comment number 11 of this letter), the AB32 percent reduction goal of 30% below BAU is a reduction in emissions from existing and proposed operational emissions. In order to be consistent with this threshold, the LRDP should include measures addressing energy efficiency for existing buildings and operations.

In summary, because the LRDP is a document that is intended to guide development at the university over many years, it is important to document the university’s commitment to protecting public health and moving toward being a climate-neutral entity. All of the mitigations and proposed policy changes that are presented in the EIR should be incorporated into the LRDP. If you have any questions regarding the above comments, please contact Molly Pearson at (805) 961-8838 (mmp@sbcapcd.org).

Sincerely,

Molly Pearson for

Bobbie Bratz
Public Information and Community Programs Supervisor

cc: TEA Chron File
Project File
Response to Comment R-39-1. The recirculated Introduction section includes a discussion of what was changed regarding the climate control topics in the Air Quality Section. This is noted on the first page of the Introduction.

Response to Comment R-39-2. The energy consumption of existing buildings is not an impact of development under the proposed 2010 LRDP, and no mitigation to reduce such consumption is required. Nevertheless, the Campus Sustainability Plan, implementation of which the Campus will support pursuant to Mitigation Measure AIR-1B, includes many measures that will improve efficiency in existing structures. Please see RDEIR page 4.2-50 for a summary of the Plan's measures.

Response to Comment R-39-3. Construction activities pursuant to the LRDP will comply with all applicable regulations, which are discussed in Section 4.2.1.5.

Response to Comment R-39-4. Construction activities pursuant to the LRDP will comply with all applicable regulations. When applied to those projects identified by its standard, LRDP Mitigation AIR-4C, along with the other mitigation measures identified for Impact AIR-4, will be sufficient to reduce emissions of construction-related TACs to a less than significant level.

Response to Comment R-39-5. Comment noted.

The third footnote text of Table 4.2-1 shall be revised as follows: “SBCAPCD attainment status for the new lead standard is undefined listed as ‘unclassified’ at this time.”

The text on page 4.2-12 shall also be revised as follows: “SBCAPCD attainment status for the new lead standard is undefined listed as ‘unclassified’ at this time.”

Response to Comment R-39-6. The RDEIR describes the environmental setting of the project with the most up-to-date information available at the time the document was prepared. The more recent historical data to which the commenter refers would not alter the RDEIR’s conclusions concerning the LRDP’s air quality impacts.

Response to Comment R-39-7. The text shall be revised as follows: “Santa Barbara County is considered in attainment of the federal eight-hour one-hour ozone standard, but the region does not meet the state one-hour eight-hour ozone standard or the standard for particulate matter less than ten microns in diameter (PM10).”


Response to Comment R-39-9. Asbestos is addressed in the Hazards and Hazardous Materials Section (4.6), DEIR pages 4.6-3, 4, and 7, and in Impact HAZ-2, which concludes that the LRDP’s impacts related to releases of hazardous materials, including airborne asbestos, would be less than significant.

Response to Comment R-39-10. All development, regardless of whether it is large enough to trigger Mitigation Measure 4-C, will be subject to CBAPCD regulations. The RDEIR’s analysis therefore
appropriately assumed the emissions reductions associated with those regulations. Larger projects that meet Mitigation Measure AIR-4C’s thresholds will be subject to the additional restrictions required by the measure, in addition to SBAPCD and all other applicable regulations.

Response to Comment R-39-11. Please see response to comment R-33-1.

Response to Comment R-39-12. Please see the response to comment R-3911.
March 30, 2009

UCSB Office of Campus Planning & Design
Facilities Management
c/o Vision 2025
Santa Barbara, California 93106-1030

Reference: Isla Vista Recreation and Park District Comments to the Recirculated Draft Environmental Impact Report for the Vision 2025 Long Range Development Plan for the University of California, Santa Barbara

Dear UCSB:

The Isla Vista Recreation and Park District ("District") submits these comments to the January 28, 2009 Recirculated Draft Environmental Impact Report ("Draft EIR") for the proposed Vision 2025 Long Range Development Plan ("LRDP 2025") for the University of California, Santa Barbara ("UCSB" or "University.")

Introduction

Chancellor Yang and administrators throughout UCSB, have acknowledged that Isla Vista is an integral part of the University. What happens at UCSB affects Isla Vista, and what happens in Isla Vista affects the University. Isla Vista has many of the problems and social ills that we see throughout Santa Barbara County and the state, such as alcohol and drug abuse, fights, rape, burglaries, gangs, gambling, trash and graffiti, to name just a few. In Isla Vista, all of these issues are exacerbated because they all happen in a one-half square mile area. UCSB needs to see Isla Vista as a resource, as well as understanding its challenges. Isla Vista can only be a successful resource for UCSB if Isla Vista has the infrastructure and services that a healthy community needs. Another way to say it is "World Class Services for a World Class University." But Isla Vista has problems even before considering impacts from the LRDP.

The DEIR for the LRDP 2025 fails to fully identify the impacts to Isla Vista and fails to articulate mitigation measures that will address these impacts. If
the Final EIR fails to address these impacts, and if UCSB fails to fully embrace Isla Vista as part of its community and commitment, Isla Vista will not be a safe or healthy community and instead will become more dangerous to its inhabitants. Right now, in some areas, it already is a dangerous place.

We would like to think that UCSB has learned from past experiences. Failing to comply with policies that govern development has cost the University time, lots of money, good will, and much of the trust and respect of the community. What did the lawsuit over the 1990 LRDP really provide for the University? In discussing the lawsuits that UC Berkeley and UC Santa Cruz settled in response to their development plans, Executive Vice Chancellor Gene Lucas acknowledged that UCSB didn’t really want to go down that same path. I hope that he is right. I look forward to meeting with the University and working out what we need to do to meet the needs of the community as well as UCSB.

4.12 Recreation Impacts

On June 23, 2008, the District submitted detailed comments on several aspects of the Draft EIR for the LRDP 2025 (See District’s June 23, 2008 letter, a copy of which is attached and incorporated herein to this comment letter). Similarly, on June 23, 2008, the County of Santa Barbara submitted detailed comments on the Draft EIR. Both set of comments provide substantial evidence that the LRDP 2025 will pose significant impacts to the District’s parks, trails, facilities and other resources and that those impacts were not adequately disclosed, evaluated and mitigated in the Draft EIR. In response to these District and County comments, UCSB did not revise the Recreation Section of the Draft EIR. As a consequence, the Draft EIR fails to adequately disclose, evaluate and mitigate impacts of the LRDP 2025 on the District’s parks, trails, facilities and other resources and services.

We reiterate our position that the University must work with the staff and Board of the District to fully identify and analyze impacts from the proposed LRDP 2025 and develop feasible mitigation for the LRDP 2025’s impacts on the District, that the Final EIR incorporate full and adequate mitigation for those impacts. Failure to do so violates CEQA and the Coastal Act, as more fully explained in the District’s June 23, 2008 comment letter and the County’s June 23, 2008 comment letter. Rather than repeat the District’s substantial evidence for those impacts and violations, we refer to the attached copy of the District’s June 23, 2008 letter documenting this evidence.
In summary, by failing to address the impacts of the LRDP 2025 on recreational resources and operations of the District, UCSB is improperly burdening the District with millions of dollars of on-going and future maintenance, rehabilitation and operational costs to provide recreational amenities and services to a significant segment of the UCSB students, faculty and staff population.

4.10 Population and Housing

UCSB has historically created a significant demand for rental housing units in Isla Vista. The Draft EIR states that 40% of UCSB students and 5.3% of UCSB faculty and staff live in Isla Vista. Of the approximate 21,000 persons who reside in Isla Vista, over 8,600 or 40% of that population is comprised of students, faculty and staff of UCSB. Many other persons who reside in Isla Vista are associated with providing services to UCSB students, faculty and staff. Thus, UCSB creates additional indirect and induced population and housing impacts on Isla Vista.

Approximately 5,264 dwelling units are estimated to exist in Isla Vista. Ninety percent of those dwelling units are renter occupied. The average household size is 2.96 persons per unit (Page 4.10-16 of the Recirculated Draft EIR) compared to a county average of 2.68 persons per unit. Based on these factors, it is clear that UCSB creates a high demand for housing in Isla Vista and that this demand contributes to high dwelling unit densities per acre and high occupancy rates per unit in Isla Vista. This demand creates additional burdens on the County and District infrastructure and services and impairs the ability of the County to provide affordable housing to other population segments in the area in accordance with its regional housing needs assessment allocation.

The LRDP 2025 not only fails to address UCSB’s current and significant impacts to housing resources and public services in Isla Vista but the LRDP 2025 will also make those impacts more severe. This is because the additional on-campus beds and housing units proposed by the LRDP 2025 are only intended to accommodate future direct growth in enrollment, faculty and staff and not to address the current deficiency in on-campus housing. No additional beds or housing units are proposed to address the current and significant demand for housing caused by the existing population of UCSB. Furthermore, no additional housing units are proposed to address the indirect and induced population that will serve UCSB when the LRDP 2025 is implemented. Making all of this worse is that the additional on-campus
housing is proposed to continuously lag four years behind the increases in student, faculty and staff population (Pages 4.10.31-32 of the Recirculated Draft EIR.), leaving a perpetual unmitigated housing impact from the growth caused by the implementation of the LRDP 2025.

Mitigation Measure POP-3A seeks to partially address this housing gap by requiring the University to seek, but not provide, leases of off-campus apartment complexes and motels to accommodate the demand for student, faculty and staff housing during these continual four-year lag periods. A requirement to "seek" is not the same as "provide" and makes the mitigation unenforceable and illusory. The Draft EIR acknowledges that there will be a significant displacement of persons and demand for housing that will not be addressed or met by the LRDP 2025. However, the Draft EIR then incorrectly concludes that this impact is "unavoidable."

UCSB has an obligation to mitigate its impacts on the demand for housing resources by providing safe, decent and affordable housing to meet the needs of not only its students, faculty and staff but the indirect and induced population increases caused by the LRDP 2025. UCSB is making a choice in its LRDP 2025 to provide more research-oriented facilities and to increase its students, faculty and staff but not address the impacts the University has on housing resources in the area, and in Isla Vista in particular. Rather than provide for feasible mitigation in the form of additional on-campus housing to alleviate the existing housing problems and rather than to provide for additional housing units before additional growth occurs, the LRDP 2025, as currently proposed, will create even more severe impacts on housing and associated resources. In Isla Vista, those impacts will include a continuation of housing demand that results in high and inappropriate housing densities in Isla Vista and high occupancy rates in rental units that overburden all aspects of the area's infrastructure and services. As a consequence, police, fire, emergency services, solid waste and utility impacts are shifted from the University to the County and other governmental units. With respect to the District and its 30 parks in Isla Vista, this housing demand and associated student population will continue to result in excessive use, wear-and-tear, trash and public safety impacts to the District's parks and operations with no mitigation to address those impacts.

These impacts are not "unavoidable." They can and should be mitigated by the University through appropriate on- and off-campus mitigation of impacts by providing more on-campus housing and by assisting the District and other governmental entities in addressing the demand for off-campus housing and
the associated impacts of providing for that housing. A failure to do so is contrary to the requirements of CEQA that lead agencies to impose all feasible mitigation of significant impacts prior to approving a project.

4.13 Transportation and Circulation

1. Parking Impacts in Isla Vista

As documented in Table 4.13-18, at least 885 UCSB employees and students who do not live in Isla Vista park their vehicles in Isla Vista every day. More than 57% of this non-resident parking is by UCSB students parking in Isla Vista rather than in a parking lot designated for their on-campus residential complex. At least 400 UCSB employees and students park in Isla Vista at least once a week, and another 415 park in Isla Vista once every two weeks. Finally, another 780 UCSB employees and students park in Isla Vista at least once a month instead of in on-campus parking lots. As a consequence, nearly 25% of all on-street parking spaces in Isla Vista are used by non-resident students, faculty and staff of UCSB and nearly 85% of all on-street parking spaces are utilized during peak parking periods.

The LRDP 2025 is likely to exacerbate the parking congestion in Isla Vista. This is because the LRDP 2025 proposes to maintain on-site student parking at a ratio of one space for every four students. Of the approximate 6,736 additional student, faculty and staff population that will occur with the LRDP 2025, the University proposes to provide only about 3,650 additional on-site parking spaces. Of this amount, only 100 net additional on-campus parking spaces will be provided for commuter and visitor parking over the planning period. Not only does this provide minimal, if any, relief to the already congested parking in Isla Vista, but it does not accommodate for the increased demand for parking generated by the increased growth of the campus population proposed by the LRDP 2025.

The Draft EIR seeks to minimize UCSB-caused parking impacts to Isla Vista by comparing the total number of faculty, students and staff at UCSB to the number of those faculty, students and staff who responded to a survey indicating they parked in Isla Vista. While the estimated 885 daily vehicles of non-resident Isla Vista UCSB student, faculty and staff parking may not be significant when compared to the total number of parked vehicles generated by UCSB uses, 885 vehicles is a very significant number when compared to the availability of parking spaces and parking demand in Isla Vista. The appropriate methodology is to consider the impact on the resource (parking
spaces in Isla Vista) rather than considering it as a percentage of the total population of UCSB.

Furthermore, in response to this overwhelming impact to Isla Vista, the proposed mitigation is not more on-campus parking but for UCSB to pay a fair share contribution toward the establishment of a proposed parking permit program in Isla Vista (Mitigation Measure TRAFFIC-10). However, contribution to a program that cannot be implanted is illusory mitigation. This is because the California Coastal Commission has already rejected this type of program. The District is not aware of a revised permit parking program proposal that has or can address the Commission’s concerns. Accordingly, Mitigation Measure TRAFFIC-10 is not likely to be implemented and is “empty” and insufficient mitigation. CEQA requires the imposition of feasible and enforceable mitigation to reduce impacts or adoption of alternative projects to minimize impacts.

The Draft EIR does not consider or explore other feasible mitigation for the parking impacts in Isla Vista. As stated above, one such measure would be to provide more on-campus and off-campus free or reduced-cost parking facilities. However, the Draft EIR does not even discuss, much less impose, this type of feasible mitigation measure. Another measure would be to prohibit some or all freshman and sophomores from bringing cars to campus, as has been done at other universities. The potential reluctance of the University to consider or impose these measures because of cost or inconvenience to UCSB does not permit UCSB to conclude these measures are infeasible.

In summary, the University already creates a significant impact on parking resources in Isla Vista. This impact will be made more severe by the LRDP 2025 and the Draft EIR fails to mitigate this impact. The failure of the Draft EIR to provide as mitigation measures more on-campus and off-campus free or reduced parking facilities or limits on student vehicles, and the conclusion, without explanation or analysis, that the parking impacts on Isla Vista are unavoidable and cannot be mitigated by any feasible mitigation, are statements and conclusions that are not accurate and are completely indefensible under CEQA.

2. Bicycle and Pedestrian Traffic in Isla Vista

The LRDP 2025 will cause an increase in pedestrian and bicycle traffic within Isla Vista, and this impact has not been adequately mitigated in the Draft EIR.
Seven new or enhanced bicycle connections will be provided between Isla Vista and the Main Campus. As a result, the intersection of eight streets at Embarcadero del Norte will have bicycle traffic volumes that warrant a bicycle signal. Similarly, six of those same intersections will warrant pedestrian signals. The flow of pedestrian and bicycle traffic at these additional points will reduce the flow of northbound and southbound vehicular, bicycle and pedestrian traffic.

Despite these identified bicycle and pedestrian impacts in Isla Vista that will be caused by the LRDP 2025, the traffic mitigation measures of the Draft EIR completely ignore these impacts. Mitigation Measure Traffic-7 only addresses on-campus bicycle and pedestrian traffic and not off-site bicycle and pedestrian traffic. No mention is made of the installation of bicycle or pedestrian signals at the intersections mentioned above or any other measures designed to accommodate or mitigate bicycle and pedestrian traffic in Isla Vista caused by the LRDP 2025. No consideration is given to the County’s recommendation that UCSB should designate less-impeding bicycle routes using Pardall Road/Sueno Road. Instead, the Draft EIR appears to simply defer mitigation of this impact to the Ocean Road Housing Project. However, CEQA precludes lead agencies from deferring the imposition of mitigation measures to later projects. CEQA requires these impacts to be mitigated as part of the EIR for the LRDP 2025.

3. **Vehicular Traffic Impacts and Improvements**

The County of Santa Barbara provided significant evidence that the LRDP 2025 will impact and require improvements to 12 roadways and intersections in Isla Vista at an approximate cost of nearly $49 million (See County’s June 23, 2008 letter, page 83-84). However, there is no mitigation measure in the Draft EIR for 8 of these 12 intersections and roadways (See pages 4.13-151 to 4.13-152).

**Alternatives**

UCSB did not evaluate an alternative that will shift more development off-campus. We suggest that UCSB consider this alternative more closely in order to accomplish its goals. This is because some of the expansion that is proposed is not for student support but for Research and Development ("R&D"). R&D is a valuable component of a University and can be a link to the business community that fosters entrepreneurship and successful businesses. We recognize the need for successful, green, intelligent business
there is too much at stake. Anyone who has been at UCSB on a Friday understands how underutilized the campus can be. We no longer have the luxury of getting something new until we have fully utilized what we have. UCSB needs to bring this understanding into their Vision 2025.

* * *

For the reasons discussed above, the District asks that the University work with the staff and Board of the District to fully identify and analyze impacts and develop feasible mitigation measures for the impacts indicated in this letter and that the Final EIR incorporate those measures.

Thank you for your attention to these important matters. If you have any questions, please contact the me at (805) 685 8712, or the district General Manager, Carol Belser at (805) 968-2017 extension 27.

Very truly yours,

\[signature\]

Diane Conn
Chair
IVRPD Board of Directors


1:24527.2
June 23, 2008

To Whom It May Concern:


The Board of Directors of the Isla Vista Recreation and Park District ("District") submits these comments to the March 2008 Draft Environmental Impact Report ("Draft EIR") for the proposed 2008 Long Range Development Plan ("LRDP") for the University of California, Santa Barbara (the "University.")

Introductory and General Comments

As discussed below, we find that the Draft EIR fails to adequately disclose, evaluate and mitigate impacts of the LRDP on the District's parks, trails, facilities and other resources and services discussed in this letter. Accordingly, we request that the University work with the staff and Board of the District to develop feasible mitigation for the LRDP's impacts on the District, that the Draft EIR be revised to incorporate full and adequate mitigation for those impacts, and that the document be recirculated for further public consideration and comment pursuant to Public Resources Code Section 21092.1.

The Draft EIR is also inadequate because even when mitigation measures are proposed, the schedule for their implementation is well after the impacts, sometimes four years later. Mitigation of any potentially significant impacts must be implemented before or concurrent to impacts.
In addition, the Draft EIR is inadequate because it fails to ensure that the LRDP will comply with the Coastal Act, which mandates protection of coastal resources. Isla Vista is a coastal community that wholly resides in the coastal zone. However, the Draft EIR has failed to adequately disclose, evaluate and mitigate the impacts of the LRDP on the coastal resources in Isla Vista.

The Draft EIR is inadequate because it fails to address impacts from increases in population groups other than students, faculty and staff. There is a multiplier effect for each student, faculty or staff member added to the University of households, family members and/or partners that join students, faculty and staff coming into the Santa Barbara community to attend or work at the University. There are also other people who come to the area to provide services to the increased population.

As noted below, the mitigation measures proposed by the Draft EIR are inadequate with regard to the proposed population increase because only the student population is limited by the proposed cap. In order for the mitigation measures proposed to actually mitigate the impacts from an increase in students, faculty and staff, all categories should have a cap for this amended LRDP. Otherwise, the University could grow staff and faculty, (in the research and development arena, for example) creating additional impacts that will not be mitigated.

The District concurs and incorporates by reference the comments of the County of Santa Barbara on the Draft EIR and LRDP, to the extent they identify impacts to Isla Vista and propose mitigations, especially with regards to infrastructure and services.

Listed below are the Sections of the Draft EIR for which the District has specific comments.

Section 4.12 Recreation

The District is a California special district that provides recreation and park services to the residents of Isla Vista as well as the general public. The District owns and maintains 22 parks encompassing approximately 50 acres of parkland and maintains three County beach access routes and parks and additional trails within its jurisdiction. These parks, access routes and trails provide a wide range of passive and active park space, access, and recreational amenities for the benefit of all who reside in, or come to, Isla Vista. The territory of the District borders public beaches and the Pacific Ocean on one side, and is surrounded by the University on its three other sides.
especially free student planned musical events in Isla Vista; (ii) police service calls to Isla Vista that often arise from these student uses; and (iii) the long and celebrated behavior patterns of student events and activities in Isla Vista. For example, the very founding of the District arose out of University student protests that occurred in open space and park areas in Isla Vista that later became District parks. That tradition of use of Isla Vista parks for a variety of student oriented events and recreation continues in a variety of forms. As noted above, the close geographical proximity of the District’s parks to the University (sometimes just one block away) and Isla Vista’s location surrounded on three sides by the University and other off-campus recreational resources that are acknowledged as being impacted by the University, make such direct use and impact indisputable.

The Draft EIR concedes some impact to off-campus recreational resources by acknowledging impacts to surrounding beach areas and county parks. However, given such disclosure, the Draft EIR’s failure to disclose, analyze and mitigate the similar and more severe impacts on District parks and facilities makes the defects of the Draft EIR pronounced.

In addition, the Draft EIR fails to disclose and impose mitigation measures designed to lessen indirect effects on the District caused by the induced population growth of the non-University population in the area. The Draft EIR also fails to disclose or impose any mitigation measures designed to mitigate the Plan’s contribution to the cumulative impact on District resources.

For example, none of the summarized impacts of the LRDP address any direct or indirect impact to the District (See LRDP Impact REC-1, REC-2, and REC-3.) In addition, there are only three mitigation measures listed in the Draft EIR for direct or indirect recreational impacts. None address impacts to the District. Those mitigation measures apply only to beach and County park impacts, and then call for an unspecified level of additional on-campus recreational facilities, continued maintenance of beach areas, and the inclusion of tennis courts and adult exercise facilities in new on-campus housing developments (Draft EIR, p. 4-12-26.) The Draft EIR then concludes that with those measures, the residual impacts to off-campus recreational resources are less than significant. Impacts to the District are completely left out of any of those conclusions and mitigation measures.

Even if these three existing mitigation measures were to be revised to assert that they also mitigate impacts to the District, there would be no evidence or analytic support for such a simple revision. This is because there is no evidence for the EIR’s assertion that providing more recreational amenities on campus will reduce off-campus recreational impacts, and particularly impacts to District parks, facilities and services, to a level of less than significant. First, Mitigation Measure REC-2A only requires additional
on-campus recreational capacity within four years after enrollment increases. This means that, at a minimum, there will be a continual four-year lag between the increased demand for recreational resources and on-campus facilities designed to partially address that need. This leaves a substantial and continual unmitigated impact. Second, maintenance of certain area beaches as provided in Mitigation Measure REC-2B provides no mitigation of District park impacts. Third, Mitigation Measure REC-2C, which was drafted to apply only to County parks, calls for adult exercise facilities and tot lots, not mitigation for the other active and passive outdoor recreation impacts within a park setting.

There is no mitigation for the fact that the additional students, faculty and staff who will reside on campus will regularly and frequently come to Isla Vista parks for events and to recreate with the sizable University student population that resides in Isla Vista. Given the sizable University population that will continue to reside in Isla Vista even after the Plan’s implementation, such demand will continue and increase as the on-campus population increases.

It is also important to place these impacts into the context of compliance with the California Coastal Act (California Public Resources Code §§30000 - 30823), which as noted in the Draft EIR, require protection of coastal resources, coastal access and preservation of inland land and recreational areas within the coastal zone (See Public Resources Code §§ 30220 - 30224). Although the Draft EIR does require ongoing maintenance of certain beaches and trails, the Draft EIR does not address the LRDP’s compliance with the Coastal Act with respect to preserving upland area for support of coastal recreational uses. The District’s parks provide important recreational resources in the coastal zone and, as stated previously, would be adversely and significantly impacted by the LRDP. The Draft EIR does not sufficiently discuss and mitigate the LRDP’s compliance with the Coastal Act.

The District seeks to have the University fully disclose and analyze the Plan’s impact on the District recreational resources and then to work with the District to develop clear, objective and enforceable mitigation to address these impacts. A feasible combination of measures would include grants to the District for acquisition of additional parkland by the District in Isla Vista and annual payments and contributions to the District for ongoing maintenance, clean-up and renovation expenses reasonably related to the University’s impacts on District parks and facilities. Additional measures may also include payment for the District’s delivery of recycled water and funds to build the District’s planned community center. Without these types of mitigation measures, the Plan’s impacts on the District will not be mitigated and the University will not have complied with CEQA’s
Students of the University who live on- and off-campus are a substantial segment of the general population served by, and who recreate in, the District's parks and facilities, or who use the District's trails to obtain access to other areas in and around Isla Vista. The Draft EIR states that approximately 40% of University students live in Isla Vista (Table 4.12.3). The Draft EIR acknowledges that the University's current academic operations place a significant demand on public recreational services by the District. This demand will increase with the additional student population proposed by the University's LRDP.

The District's parks are already overburdened based on the population served. Even without accounting for the on-campus student use of District parks, the ratio of parkland per acre compared to the population in Isla Vista is approximately 2.7 acres of parkland for each 1,000 persons. This is less than the minimum standard of three acres of parkland per 1,000 persons specified in the California Quimby Act (Government Code Section 66477) and much less than the County of Santa Barbara standard of five acres per 1,000 persons. Accordingly, any direct or indirect increase in demand on District parks will further exacerbate the lack of available recreational resources needed to serve the Isla Vista population.

The Draft EIR asserts that because the LRDP proposes to accommodate all new student, faculty and staff in on-campus housing and to provide certain new recreational amenities on campus, that direct and indirect impacts to recreational resources will mainly affect campus facilities and adjacent beaches (Draft EIR at p. 4.12-24). The Draft EIR, however, fails to adequately disclose and analyze the other side of that equation which is the direct and indirect impacts to District parks and trails.

There is substantial evidence that: (i) there is significant existing use of District parks and trails by the current population of University students, faculty and staff, even with the existence of on-campus recreational facilities; (ii) the fact that on-campus students, faculty and staff regularly use District trails to traverse to other areas, including beaches, in the study area; and (iii) that current on-campus and off-campus students, faculty and staff currently attend, and will continue to attend, planned and informal recreational gatherings, parties and musical events at District parks in Isla Vista. All of these existing direct impacts will be increased with additional student, faculty and staff populations at the University and cause wear-and-tear, clean-up, repair and renovation expenses on District owned and maintained parks and facilities. Furthermore, it is common fact that Isla Vista parks act as a crossroads point for social interaction between students who live on campus and those who reside in Isla Vista.

Substantial evidence exists of the current and reasonably likely impacts to the District by way of: (i) regular notices of student planned events,
requirement to provide feasible mitigation to reduce these impacts to a level that is less than significant.

Section 4.11 Public Services

The LRDP proposes a substantial increase to University student, faculty and staff population. For the same reasons mentioned in our prior comments under recreational impacts, the inevitable challenge of trash management and graffiti will further intensify with approval of the LRDP. The District already has programs in place that aim to involve the community in maintaining trash and graffiti in Isla Vista. These programs provide for the meticulous documentation and removal of both trash and graffiti. However, with additional University population, there will be a significant increase in the need for these services because University students are a well-documented source of these impacts. The Draft EIR does not disclose, analyze or mitigate these impacts.

The increased service requirements on the District to address the additional trash and graffiti will increase the amount of money, time, and resources spent by the District to rectify these inevitable consequences. The District acknowledges that the University is currently a partner in “Adopt-A-Block,” a program that seeks to address some of these problems. The District appreciates the University's involvement in that program. However, increased University population and induced population arising from the LRDP will require more graffiti and trash management services, and more funding to mitigate those impacts. The Draft EIR is deficient in providing any mitigation for these impacts.

With respect to police services, the impacts on the District from graffiti abatement have already been noted in the prior comment. In addition, Isla Vista requires a high level of police patrol, especially on the weekends, due to well-documented excessive alcohol and drug use by some University students. The impacts to District parks from this behavior include graffiti, trash and vandalism to District facilities, equipment and landscaping. The University's impact on police services in Isla Vista is already acknowledged by the fact that University officers provide additional patrols in Isla Vista. The direct, indirect and induced population growth arising from the LRDP will result in additional demand for police services needed to address the behavior mentioned above. To maintain a safe community, more people will require more police. The Draft EIR fails to provide sufficient clear, objective and enforceable mitigation for these impacts.

Section 4.13 Traffic and Circulation

The LRDP will cause an increase in vehicular, pedestrian and bicycle traffic within Isla Vista, and this impact has not been adequately addressed in the Draft EIR. It is well recognized that with the existing roadway
infrastructure, peak-hour traffic and inclement weather, public transportation is not currently effective to accommodate existing volumes of traffic in Isla Vista. Consequently, any increase in traffic in Isla Vista will burden an already overburdened transportation system and will be significant, especially bicycle and pedestrian traffic. Especially troubling is that an increase in vehicular traffic will significantly impact pedestrian and bicycle traffic. The impacts of greater vehicular, pedestrian and bicycle traffic impacts are not adequately disclosed and mitigated in the Draft EIR.

In addition, if all Isla Vista streets are opened to connect to Ocean Road, then traffic will increase significantly in Isla Vista. We note that now only Sabado Tarde opens on to Ocean Road, and it is gated to permit entry by buses only. The District supports opening up bike lanes to the University campus to distribute bicycle traffic. However, the District opposes opening vehicular traffic from Ocean Road into east-west Isla Vista streets. No increase in vehicular traffic from ocean road to Isla Vista should be permitted unless and until feasible mitigation measure are proposed and funded.

The Draft EIR is inadequate because the traffic mitigation measures are proposed to be phased in over time three to four years after the impacts have occurred, leaving a continual unmitigated level of impact. To effectively mitigate to a level of less than significant, mitigation measures must be implemented prior to, or concurrently with, planned impacts.

With respect to impacts on vehicular parking, University students and staff now park in Isla Vista to avoid paying for on-campus University parking. More students and staff will exacerbate the current problem. The proposed mitigation through the establishment of a proposed parking permit program (Mitigation Measure TRAFFIC-10A) does not constitute enforceable mitigation because the California Coastal Commission has already rejected this type of program. The District is not aware of a revised permit parking program proposal that has or can address the Commission's concerns. Accordingly, Mitigation Measure TRAFFIC-10A is not likely to be implemented and is "empty" and insufficient mitigation. CEQA requires the imposition of feasible and enforceable mitigation to reduce impacts even if those impacts cannot be lessened to a level of less than significant.

The University should explore and then include in the Draft EIR other feasible mitigation for this impact. One such measure would be to provide more on-campus and off-campus free or reduced-cost parking facilities. Another measure would be to prohibit all freshman and sophomores from bringing cars to campus, as has been done at other universities. The potential reluctance of the University to consider or impose these measures does not justify a failure of the Draft EIR to evaluate and provide for them in the Draft EIR.
**For the reasons discussed above, the District asks that the University work with the staff and Board of the District to develop feasible mitigation measures for the impacts indicated in this letter, that the Draft EIR be revised to incorporate those measures, and that the Draft EIR be recirculated to provide additional public review and comment pursuant to Public Resources Code Section 21092.1.**

Thank you for your attention to these important matters. If you have any questions, please contact the District's General Manager, Carol Belser at (805) 968-2017 ext. 27.

Sincerely,

Ken Warfield  
Chairman of the Board
**Letter R-40**  
Isla Vista Recreation and Park District  

3/30/2009

**Response to Comment R-40-1.** As this comment incorporates Letter A-4, please see the responses to the comments contained in that letter.

**Response to Comment R-40-2.** Please see Master Response - Population and Housing. It is important to note that Mitigation POP-3A does not guarantee a lag time between housing and enrollment growth; it sets a limit on that lag time and includes measures to close the gap should one develop. It is, moreover, binding, and commits the University to provide housing through means, primarily seeking housing in existing buildings, that will minimize physical impacts to the environment, such as those caused when demand leads to housing construction. This mitigation ensures, as the RDEIR concludes, that impacts related to direct population growth under the LRDP, though significant and unavoidable, will only be temporary.

Moreover, as CEQA requires, the RDEIR analyzes and identifies mitigation for the impacts of the proposed project. The impacts of past projects are a part of the existing conditions, against which the LRDP’s impacts are compared.

**Response to Comment R-40-3.** The LRDP will provide housing for all additional students and employees added pursuant to enrollment growth under the LRDP. Parking will be provided at the housing complexes to accommodate student, faculty, and staff residents. Due to the close proximity of the new housing uses to the campus, students, faculty, and staff will not be permitted to drive to campus. Therefore, additional parking, beyond that being provided as part of the housing complexes, is not needed on the main campus to accommodate the growth proposed under the LRDP. In addition, the campus currently has a parking supply that exceeds demand as shown in Table 4.13-13. UCSB currently has several hundred unused parking spaces available at any given time. The cause of the Campus’ impact on the availability of parking in Isla Vista is not a lack of parking on campus, but the fact that Campus parking costs money but parking is free in Isla Vista. The LRDP does not propose free parking, because such a policy would undermine efforts to reduce trips to and from campus (see response to comment R-4-19), and would thereby exacerbate environmental impacts related to vehicle use, such as air pollutant emissions and traffic congestion.

The University remains a willing partner in establishing a parking permit program in Isla Vista for the benefit of both Isla Vista and the campus if the County of Santa Barbara decides to institute such a program.

**Response to Comment R-40-4.** The effects of bicycle and pedestrian travel on study intersections in Isla Vista were evaluated. Tables 4.13-9 and 4.13-42 in the Recirculated Draft EIR present the findings of bicycle and pedestrian warrant analysis. Impacts and mitigations related to bicycle circulation are discussed in Impact TRAFFIC-7, RDEIR pages 4.13-159 through 161.

**Response to Comment R-40-5.** RDEIR section 4.14 identifies and proposes mitigation for all intersections and roadway segments where the LRDP’s contribution to traffic congestion meets the relevant jurisdiction’s standard of significance.

**Response to Comment R-40-6:** UC Santa Barbara currently makes use of off-campus facilities for research and distance learning, which would continue under the LRDP. Most programs will continue to be housed on Campus, as moving them away would insufficiently advance the LRDP’s objectives of strengthening the Campus form and fostering student-faculty interaction and collaborative learning. Regarding the alternative of housing enrollment and program growth on a satellite campus, please see response to comment I-42-12.
March 30, 2009

University of California Santa Barbara
Office of Campus Planning and Design
Attn: Vision 2025
Santa Barbara, CA 93106-1030

Re: Comment Letter to UCSB’s 2008 Long Range Development Plan, Recirculated Draft Environmental Impact Report (RDEIR)

The Montecito Water District (MWD), as a public and responsible agency is responding to the University of California Santa Barbara (UCSB) proposed 2008 Long Range Development Plan (2008 LRDP) Recirculated Draft Environmental Impact Report (RDEIR) more commonly titled UC Santa Barbara Vision 2025.

MWD staff has completed a review of the RDEIR and is voicing its concerns regarding the validity of the findings in Section 4.14, “Water”. These findings are based upon misunderstanding and incorrect application of water supply and demand information used in this analysis. MWD and the Goleta Water District (GWD) are both members of the Cachuma and State Water Projects and it is MWD’s contention that this shared use of the local surface and imported water supplies and facilities is just cause for MWD’s response to the University’s RDEIR.

MWD’s scrutiny of the RDEIR has also included direct participation by an MWD Board member in publicly noticed meetings that provided a forum to discuss the analysis, implications, and consequences of the University’s long range development plan (LRDP) and its projected affect on shared water supplies. MWD’s specific RDEIR concerns relate to the following:

- Inaccurate reporting and understanding of southcoast water supplies leading to the incorrect conclusion that the LRDP RDEIR water supply impacts are “less than significant”,
- The RDEIR water supply and demand baseline conditions are incorrect and do not accurately reflect the baseline conditions clarified by GWD in Attachment A of their March 30, 2009 RDEIR comment letter.
- The University LRDP is a proposed new project that has not been previously planned for or incorporated into local community plans or GWD’s current and future water supply and demand projections.
- The RDEIR water supply analysis incorrectly concludes that other reliable supplemental water supplies are available to serve the University LRDP if existing water supplies are insufficient.
MWD acknowledges and references the extensive and exhaustive DEIR review and analysis prepared by Goleta Water District (GWD), the water purveyor for UCSB. GWD has provided its own comment letter dated March 30, 2009 and MWD fully agrees with GWD’s comments on its available water supply and demand calculations. MWD believes that those comments reflect the true and accurate water supply condition now and into the foreseeable future for its service area. MWD also agrees with GWD’s general comments which in summary states the “the District believes that the University’s LRDP potable water demand exceeds the District’s available potable water supply. In accordance with CEQA, the proposed project will have Significant and Unavoidable Class 1 Impacts to potable water supply that cannot be feasibly mitigated during the planning period.”

The University, in the preparation of RDEIR Section 4.14 initially utilized the GWD 2005 UWMP and referenced the MWD 2005 UWMP. MWD was never consulted as to the present value of its UWMP with the significant water supply and demand changes that began District-wide in 2006. MWD experienced a significant and unexpected increase in customer water demand that was and continues to be very close to the projected community build out demand in 2020. This abrupt water demand increase caused MWD’s 2005 UWMP to be outdated one year after its release.

More importantly, MWD recognizes that the University’s proposed LRDP is a Project as defined in CEQA and in Senate Bill (SB) 610. As a Project, the University is required to prepare a detailed and specific water supply and demand analysis under the guidelines of SB 610 in addition to CEQA. The provisions of SB 610, which is the preparation of a formal Water Supply Assessment (WSA) requires that University work directly with the water purveyor to fully understand the implications and consequences of its Project on water supply.

MWD understands that during the initial preparation of the LRDP DEIR the University became aware of a WSA that was prepared for the City of Goleta in 2008. The University utilized the City of Goleta WSA, prepared by GWD for more current water supply and demand information in re-analyzing the Project water supply and demand impacts and recirculated the DEIR February 8, 2009. Under the provisions of SB 610, a project specific WSA must be prepared by the University and GWD for the University LRDP. GWD and the University both have noted that a Project WSA has not yet been prepared and GWD has indicated that revisions to its Water Supply and Ground Water Management Plans must be completed prior to preparing any future project-specific WSA. Until such time as a Project-specific WSA is prepared, it is MWD’s opinion that Section 4.14 of the University RDEIR does not accurately represent water supply conditions at GWD and therefore cannot be used in the analysis of Project water supply impacts.

MWD also takes exception with the University’s interpretation and analysis of GWD’s water supply portfolio. In many instances, the University has confused water supply terms such as allocations, entitlements, banked water, and drought buffers without fully understanding the value and application of each water supply term. Basic water supply management principles and operations used by water purveyors in community development planning define available long-term water supplies as those percentages of entitlement or allocations that are considered the deliverable and reliable portion of its water supply. All other terms such as water supply buffers, banks and carryover are those supplies that may be temporarily available and reserved by the purveyor to augment the reduction in the available long-term reliable supply that occurs in times
of extended drought. In other words, all carryover water and water banks are used to provide water to its existing customers in times of drought.

Case in point, the Cachuma Project allows south coast districts to utilize the lake for the storage or carryover of its annual entitlements or allocations from year to year. Lake Cachuma carryover water can also include the banking of State Water. Lake Cachuma is not considered a long-term viable water banking facility due to the spill events that occur on a three year average cycle. With a spill event, all purveyor carryover or bank water in Lake Cachuma is lost due to the US Bureau of Reclamation contractual water rights terms and conditions in operating a dam on the Santa Ynez River.

Further review of RDEIR Section 4.14-45, 46 and 47, Effect and Feasibility of Mitigation discusses the University’s potential for developing additional water supplies to serve the LRDP. The RDEIR identified the purchase of State Water entitlement as a potential water supply. The purchase of State Water entitlement is a limited option and must be received from an existing Central Coast Water Authority (CCWA) State Water contractor. The CCWA State Water conveyance pipeline capacity has been designed for the delivery of those entitlements purchased by each CCWA State Water contractor. There is no additional Table A capacity available for the delivery of State Water that is purchased outside of CCWA.

MWD must also point out that State Water entitlement delivered to CCWA is subject to varying allocations from year to year which are dependent on the annual northern California snowpack, State Water reservoir capacities, and now Delta environmental conditions and restrictions.

Water demands on the SWP are increasing and the reliability and delivery of water from this water supply is decreasing. The recent declaration of a Statewide drought emergency by the Governor and the inability of the Department of Water Resources to develop a dry year water purchase program that will satisfy the water demand needs of State Water contractors is causing agricultural and municipal water supply hardships throughout the State. The University’s claim that it can purchase and bring a new reliable source of water to the community is inaccurate and a misrepresentation of a possible water supply mitigation measure to offset water supply impacts as caused by the Project. The University may be able to buy State Water but its unreliability will without a doubt increase the frequency of water shortages to the south coast due to unmet Statewide delivery requests of State Water entitlement.

As an example, MWD has 3000 acre-feet (AF) of Table A State Water entitlement with a 300 AF drought buffer. The reduction in State Water allocations beginning in 2006 caused significant impacts to MWD’s water supply portfolio. MWD in 2008 was fortunate to purchase 1,400 AF of State water from an expensive dry year water purchase program. State Water allocations for 2009 have been reduced even further and MWD must again look for supplemental dry year water in order to meet the water demand of its existing customer base. To date, MWD has not been able to locate any dry year program water and its ability to meet existing customer demand is now in question for the 2009/2010 water year.

It is MWD’s opinion, that the University LRDP cannot be approved or even considered until such time that a WSA has been prepared with the oversight of the GWD and the uncertainties in
the delivery of State Water are fully understood. At this time, it appears that insufficient water supplies are available locally and from the State Water Project to serve this Project. To permit a project of this size would only exacerbate the current local and State wide chronic water supply shortages that are adversely affecting the quality of life for the customers of the Montecito Water District.

Respectfully,

Tom Mosby
General Manager

cc: MWD Board of Directors
    Eric Ford, GWD General Manager
Response to Comment R-41-1. A. This comment summarizes the commenter’s letter. The detailed comments are responded to individually, below.

B. Please see the responses to comment letter R-13 and Master Response – Water Supply.

C. The RDEIR relies primarily on the Goleta Water District’s 2008 Water Supply assessment prepared in connection with the City of Goleta’s General Plan. The MWD 2005 UWMP was consulted for research purposes in preparation of the EIR, but was not used as a basis for impact analysis.

D. Please see the response to comments R-13-52 and Master Response – Water Supply section I.

E. Please see Master Response – Water Supply, sections III.D and IV.A and responses to comments R-13C-2, -4, -5, -6; R-13-5, -7, -12, -18 and -20.

F. The RDEIR bases its projections for Lake Cachuma supplies on the 2008 WSA as recommended by GWD. Please see Master Response – Water Supply, sections I and IV.A.

G. Please see Master Response – Water Supply, section VI.B.

H. Please see Master Response – Water Supply, section IV.B.

I. Please see Master Response – Water Supply section VI.B.
March 16, 2009

Campus Planning and Design
Facilities Management
c/o Vision 2025
UC Santa Barbara, CA
93106-1030

Re: Comments to the Recirculated Draft Environmental Impact Report for the 2008 Long Range Development Plan

Dear Sir:

The Central Coast Water Authority appreciates the opportunity to review the Recirculated Draft Environmental Impact Report for the 2008 Long Range Development Plan and offers the following comments relating to the State Water Project in Section 4.14.

Section 4.14.1.2

Page 4.14-3 Under "the State Water Project," the document does not properly characterize the 450 acre-feet of "drought buffer" water or the 2,500 acre-feet of "additional Table A allotment" (this water is actually another type of drought buffer). Both of these amounts do not have either water treatment or pipeline capacity associated with them. They are used to increase overall reliability only.

Page 4.14-7 Under "Normal Years," the document mixes State and local definitions for normal, dry, critical, average, above average and wet years. The results are confusing and perhaps inaccurate. Additionally, Table 4.14-1 assumes that Goleta will take its full allotment of SWP water in all years. Due to the risk of spill in Lake Cachuma (historically every 3 years), Goleta often decides to not risk SWP deliveries when it determines that there is a risk of spill.

Page 4.14-8 The document assumes that 3,584 acre-feet of "Cachuma Surface Water Buffer is available for use during a critical dry year. While this may be true in some circumstances, carryover water is only available in the first dry year. Subsequent dry years will not have access to this water. This is also confusingly depicted in Table 4.14-2.

Page 4.14-11 Under "Factors That Could Affect the availability of Water Supplies to the District," the document estimates that, on average, 63% or 4,693 acre-feet of SWP water is available to the District. This is only true if the water not immediately needed, can be stored. Otherwise, it must be locally sold or lost according to the Water Supply Agreements and the State Water Supply Contract. Local storage in Lake Cachuma is risky due to spill potential, and local groundwater storage is only an option if capacity exists.

Page 4.14-12 Under "Dry Year Water Programs," the document does a poor job of characterizing the programs and the associated reliability. In most years where programs have been offered, they have been run by the State Water Contractors rather than DWR. Typically, the availability of water has been small in relation to the
demand, and environmental regulations have created situations where some of the water cannot be moved through the Delta to the SWP pumps.

Section 4.14.2.3

Table 4.14-14 on Page 4.14-44 probably overstates the normal State Water deliveries until and unless a Delta Isolated Facility can be constructed and off site groundwater storage is available to the County.

Page 4.14-46 incorrectly assumes that it may purchase unused allotment from Santa Barbara County. The County does not have the ability to treat or transport any SWP water. All SWP Table A amount in the County is fully subscribed by the project participants of the Central Coast Water Authority.

The document also incorrectly assumes that it may purchase unused Table A from a CCWA project participant. At this time, only the Carpinteria Valley Water District has expressed an interest in selling some of its Table A amount. It is currently in negotiation with other entities, however, and this opportunity is likely to be very short lived.

Table 4.14-15 picks the year 2005 to show excess water available from CCWA project participants. It is unclear why this year was picked, as it does not represent a typical year, nor does it represent either a best case or worst case scenario. In our opinion, the data has very little value in estimating local SWP resources.

Finally, CCWA would like to point out that it was never contacted during the research phase of this document's preparation. To our best knowledge, the State Department of Water Resources was never contacted either. The State Water system throughout California and within Santa Barbara County is very complicated with several overlapping contracts, agreements and settlements. Making assumptions without full knowledge of all of these contracts, agreements and settlements can lead to faulty conclusions. In the future, CCWA would appreciate the opportunity to weigh in earlier in the process.

Please contact me if you have questions or require further information.

Sincerely,

[Signature]

William J. Brennan
Executive Director

WJB
Letter R-42
Central Coast Water Authority

3/16/2009

Response to Comment R-42-1. A. Please see the response to comment R-13C-2.

B. Regarding the definitions for water year types used in the EIR, please see the response to comment R-13C-6.

C. Please see Master Response - Water Supply sections I and IV.A. The water supply figures in RDEIR Table 4.14-1 are drawn directly from the 2008 WSA (Table 3.4).

D. Please see Master Response - Water Supply section IV.A.

E. The RDEIR reasonably relies on the 2008 WSA to determine the expected SWP deliveries in future years. Please see Master Response - Water Supply sections I and IV.B.

F. The RDEIR reasonably relies on the 2008 WSA's description of opportunities for SWP contractors to purchase additional water during dry weather cycles. Also, as discussed in recirculated section 4.14 and Master Response - Water Supply section II, the LRDP will not necessitate such water purchases. Please also see Master Response - Water Supply section VI.B.

G. The RDEIR reasonably relies on the 2008 WSA to determine the expected SWP deliveries in future normal years. Please see Master Response - Water Supply sections I and IV.B.

H. Please see Master Response - Water Supply section VI.B.

I. Please see Master Response - Water Supply section VI.B regarding the availability of SWP supplies.

J. The Central Coast Water Authority is neither a trustee nor a responsible agency with respect to the LRDP, and did not directly receive the Notice of Preparation from the EIR preparers. As explained in Master Response – Water Supply section I, the Goleta District, a CCWA member agency, was consulted throughout the EIR process.
March 25, 2009

Mr. Tye Simpson
Director of Campus Planning & Design
University of California
Santa Barbara, CA 93106-1030

Dear Mr. Simpson,

The Santa Barbara Metropolitan Transit District (MTD) has reviewed the University of California, Santa Barbara (UCSB) Long Range Development Plan (LRDP) Recirculated Draft Environmental Impact Report (EIR) and offers the following comments.

The Draft EIR, in section 4.13, continues to state that the impact of the UCSB LRDP on transit ridership in the vicinity of campus would be “Less than significant.” MTD strongly disagrees with this assessment, for the following reasons.

- The LRDP proposes an additional 5,000 students, which represents a 25 percent increase in the student population. This increase is expected to generate at least a 25 percent increase in student bus ridership.
  - If new student ridership is consistent with current ridership patterns, 35 percent of the additional ridership would be on the six lines that serve the UCSB/Isla Vista area (Lines 11, 15x, 23, 24x, 25, & 27). The remainder would occur throughout the other MTD routes.
  - Several trips on the six lines mentioned above already operate at or near capacity, and often are required to leave passengers behind due to overcrowding. These six lines represent only 25 percent of MTD routes, 27 percent of revenue hours, and 32 percent of system miles. However, 45 percent of MTD overloads occur on these lines. In October 2008, Line 24x, for example, was overloaded to the point that it had to leave passengers behind an average of 3.6 trips per day.
  - The expected additional student ridership will exacerbate the overload problem and create a significant adverse impact on public transit service. Mitigation of this impact will require financial assistance from UCSB.
- The LRDP also proposes a significant increase in UCSB faculty and staff. These persons and their family members will further impact local transit.
- Santa Barbara County staff has estimated that, in total, the LRDP will result in an additional 11,106 UCSB students, faculty, staff, and family members.
- MTD expects that the impacts on MTD transit service from these additional persons will be significant and will require UCSB mitigation. The mitigation must be sufficient to allow MTD to enhance transit service in the UCSB, Isla Vista, and Goleta areas to accommodate the new population.
- Due to current and projected budgetary constraints, it is not feasible for MTD to use existing sources of revenue to expand service to meet the transit needs of LRDP-related population growth:
  - MTD forecast sales tax receipts have decreased significantly from previous years.
  - The state of California has eliminated State Transit Assistance funding.
MTD requests the following actions from UCSB to mitigate the expected significant transit impacts:

- Amendment of the LRDP and Draft EIR to include a new mitigation measure and LRDP Policy stating that UCSB commits to providing capital assistance and ongoing operating assistance as necessary for MTD to provide the necessary transit enhancements to address the effects of the new demands upon the MTD system. MTD's previous comment letter of June 20, 2008 (attached) provides a discussion of transit enhancements that MTD believes would mitigate these impacts. At that time, MTD estimated that the enhancements would require:
  - Between $4.1 million and $6.3 million in initial capital assistance.
  - Between $2.9 million and $4.0 million in ongoing annual operating assistance.
- MTD requests that MTD and UCSB work cooperatively to refine these estimates and develop a mutually-acceptable transit enhancement program to be funded by UCSB on an ongoing basis.

Diverting already-overstretched transit resources from other parts of the District to fund additional transit needs in the UCSB area is not an option. To avert a degradation of transit service in the area, it will be necessary for UCSB to provide the requested ongoing operating assistance to MTD and to assist with capital costs for such things as additional buses and bus stop furnishings. The University’s commitment to working with MTD by providing funding for necessary transit services should be elucidated in the LRDP. The vague mitigation language currently in the Draft EIR is inadequate.

In keeping with its progressive reputation and as a leader in the community, UCSB should place more emphasis on alternative transportation modes than on accommodating cars. The requested transit enhancements will help UCSB to mitigate the significant Traffic and Air Quality impacts identified in the Draft EIR at much less cost than the roadway improvement mitigations currently proposed. In addition, more frequent buses and expanded hours of transit service would facilitate coastal access in an area where lack of available public parking is often a limiting factor.

MTD’s support of the LRDP is contingent upon a commitment from UCSB to mitigate the transit impacts, as requested above. Without this commitment from UCSB, MTD cannot support the LRDP.

Thank you for this opportunity to comment. If you have any questions, or if you would like to discuss this further, please feel free to contact me.

Sincerely,

Sherrie Fisher
General Manager

Attachment

cc: Derek Johnson, Santa Barbara County
    Steve Hudson, California Coastal Commission
20 June 2008

Marc Fisher
Associate Vice Chancellor for Campus Design & Facilities
University of California
Santa Barbara, CA 93106-1030

Dear Mr. Fisher,

The Santa Barbara Metropolitan Transit District (MTD) has reviewed the University of California, Santa Barbara Long Range Development Plan (UCSB LRDP) Draft Environmental Impact Report (DEIR) and offers the following comments:

The DEIR, in section 4.13, claims that the impact of the UCSB LRDP on transit ridership in the vicinity of campus would be “Less than significant.” MTD strongly disagrees.

Currently, UCSB students account for about 10.5% of MTD’s system-wide ridership, while faculty and staff make up another 3% or more. While these UCSB-affiliated populations travel throughout MTD’s system, they comprise a much higher portion of our ridership on the six routes serving UCSB and the community of Isla Vista. For example, 57% of the current passengers on MTD’s line 24x are UCSB students and nearly 40% of all UCSB student trips are on line 24x. On average, more than 30% of the passengers on routes 11, 15x, 23, 24x, 25, and 27 are UCSB students and several trips on these routes are regularly overloaded or operate near capacity already.

It is important to note that the ridership figures in the previous paragraph are for UCSB students, and do not include faculty and staff (and their families) or visitors, none of whom are separately tracked by MTD. New UCSB faculty, staff, and their families will add an additional 4,300 or more people to MTD’s service area.

Although UCSB is proposing to house all of its new population on campus, people will continue to use local transportation systems as they travel off-campus to visit friends, go downtown, etc. The proposed 25% increase in the student population can be expected to generate at least a 25% increase in student transit ridership, but this ridership will not be distributed evenly through the MTD system. Route 24x, for example, already experiences overloaded trips each day leaving passengers at the curb. This route would be expected to bear a 15-20% ridership increase. Other routes serving UCSB would be similarly affected.

The DEIR does not consider cumulative impacts to transit ridership that would result from the adoption of both the UCSB LRDP and the Isla Vista Master Plan (IVMP), which proposes to add 4,355 new residents to Isla Vista — a 24% increase in that community’s population.

To accommodate the cumulative additional population envisioned by these plans and avert a degradation of transit service in the area, MTD suggests initially increasing the span of service and reducing headways

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1 UCSB faculty & staff ridership is not tracked separately by MTD, but the DEIR says a 2006 survey found that 7% of faculty and staff typically commuted by transit.
2 Line 24x is an express service between downtown Santa Barbara & UCSB.
4 The DEIR states that the average household size in the area is 2.7 persons but that in 17% of faculty/staff households, both adults are employed at UCSB.
(time between buses) on routes 23, 24x, 25, and 27, and possibly creating a new route to serve proposed UCSB housing locations that are not currently served by transit. These improvements could be phased to coincide with the gradual increase in UCSB & Isla Vista populations, but they will ultimately require between 27,000 and 38,000 additional revenue hours per year and will entail the expenditure of $4.1-6.3 million in up-front capital costs (for buses and bus stop furnishings). Additional ongoing operating costs (after fare box recovery) would be roughly $2.9-4.0 million per year.\(^5\)

Diverting already-overstretched transit resources from other parts of the District to accommodate additional transit needs in the UCSB area is not an option. New fare box revenue is not expected to offset much of the cost\(^6\), so to obtain this service, it will be necessary for UCSB and the County of Santa Barbara to provide ongoing operating assistance.

In keeping with its progressive reputation and as a leader in the community however, UCSB should consider placing more emphasis on alternative transportation modes. The IVMP calls for 15-minute transit headways day and night. While such high frequencies may not be appropriate for all routes at all times, the ultimate goal is to make alternative transportation options, including transit, so convenient that few people will choose to drive their cars to campus or in Isla Vista.

Transit industry experience and elasticity calculations show that further transit enhancements, especially if combined with strong incentives to use transit (such as again providing free transit passes to UCSB faculty and staff), could also help mitigate the Significant and Unavoidable traffic impacts of the LRDP and IVMP on the larger Goleta area. More frequent buses and expanded hours of transit service would also facilitate coastal access in an area where lack of available public parking is often a limiting factor.

It will be essential for UCSB and the County of Santa Barbara to work together and with MTD to minimize the impacts of the UCSB LRDP and the IVMP by ensuring that convenient, reliable, and affordable public transportation continues to be available in the UCSB/Isla Vista area.

Thank you for this opportunity to comment. If you have any questions, or if you would like to discuss this further, please feel free to contact me.

Sincerely,

Sherrie Fisher
General Manager

cc: Jamie Goldstein, Santa Barbara County Redevelopment Agency,
    Steve Hudson, California Coastal Commission

\(^5\) Based on MTD FY 2009 budgeted total hourly operating cost (not including depreciation) of $107.51. Operating costs will increase as fuel prices and other expenses continue to rise.

\(^6\) Estimated fare revenue assumes that 75 percent of riders would be UCSB students who would not pay additional fare, and 25 percent of riders would pay an average fare of $0.92.
Letter R-43
Sherrie Fisher
Santa Barbara Metropolitan Transit District

3/25/2009

Response to Comment R-43-1. Please see response to comment A-12-48 and A-13-1.
March 26, 2009

Campus Planning and Design
Facilities Management
c/o Vision 2025
UC Santa Barbara, CA 93106-1030

RE: Comments on Recirculated Draft Environmental Impact Report for UCSB Long Range Development Plan Section 4.15 Wastewater

To Whom It May Concern:

This letter is submitted by the Goleta Sanitary District (GSD) in response to your recirculated draft environmental impact report for UCSB’s long range development plan (SCH No. 2007051128). This letter follows our initial comments sent in a letter dated June 19, 2008 to Alissa Hummer. As in the previous letter, GSD has focused its review on the revised Section 4.15 that deals exclusively with sewer service and wastewater treatment. The following comments submitted by GSD are based on the January 2009 version of the draft EIR.

1. Section 4.15.1.3 Goleta Sanitary District Wastewater Treatment Plant, paragraph 3 misstates that the proposed treatment plant upgrade will enable the District to reliably increase the production of recycled water. In fact, the treatment plant upgrade is not being designed to increase capacity through either the reclaimed water facilities or the ocean discharge facilities but is being designed to increase the level of treatment for the effluent discharge to the ocean. The production capacity of reclaimed water today is 3.3 MGD, of which 10% (0.3 MGD) is needed for operation of the facility thereby leaving a total of 3 MGD of reclaimed water available to the community.

2. The EIR projects, that upon completion of all the proposed long range development the wastewater flows from the University will exceed the allotted capacity at full build out. The university offers two mitigation measures to mitigate the significance of this impact on the environment.

   a) The first mitigation, WW-1A, would request that GSD and GWSD apply to the RWQCB to modify or re-issue each district’s NPDES permit. GSD would like to repeat the clarification as stated in its earlier comment letter of June 19, 2008, that only one NPDES permit governs capacity issues at the wastewater treatment plant and that permit is held by GSD. Any applications to the RWQCB to modify the operating permit in any way would have to be initiated by GSD. GWSD does not have a permit with the RWQCB for either treatment or discharge of wastewater into the Pacific Ocean.

GSD is four years into the process of upgrading the level of treatment at the wastewater treatment plant with no plans for increasing capacity. The upgraded treatment facility will be
completed and operational by November 2014 with a new NPDES permit such that the permitted capacity (currently at 7.64 MGD) will be modified to equal the design capacity (9.7 MGD). GSD will not be in a position to request increased capacity until the current project is completed due to the potential such a request would have on delaying the progress of the project. A settlement agreement between GSD and the RWQCB contains a conversion schedule detailing project milestones, completion dates and stipulated penalties for failure to complete the project on time.

At some point in the future should UCSB request that GSD ask the RWQCB for an increase in plant capacity, UCSB would be responsible for all costs incurred in the preparation of such application and for the cost of upgrading the treatment plant.

UCSB states that “increasing the NPDES permit capacity will not involve any physical changes that could have a significant effect on the environment”. This assumption is incorrect and in fact, the GSD is in the midst of preparing an extensive CEQA document for the current treatment plant upgrading project that includes various environmental mitigation measures.

b) The second mitigation measure WW-2B suggests that the University will negotiate the acquisition of additional capacity in the GSD wastewater treatment plant with either GSD or GWSD, both agencies projected to have an excess of capacity at buildout. Table 4.15-5 shows 2008 GSD flow to be 2.54 MGD when the actual flow for 2008 was 2.98 MGD. This slightly higher flow causes the share of WWTP Design Capacity at Buildout for GSD to decrease from 0.51 MGD to 0.07 MGD. GSD does not believe it is prudent to sell any of its remaining capacity and GSD intends to retain and preserve its capacity allocation for the needs of its service area.

3. The first bulleted item under Table 4.15-5 stating that “...as well as buildout of that portion of the 2008 LRDP that falls within the District” should be removed because there is no LRDP flow within GSD.

4. UCSB states that there will be excess capacity available for the University to purchase without purchasing GSD’s share and that the selling of additional treatment plant capacity is within the responsibility and jurisdiction of another agency. GSD advises the University to review the contract with GSD and the other treatment plant contractual users that addresses transfers and sales of capacity rights.

We appreciate the opportunity to offer you our comments and please do not hesitate to call upon us if you need further information.

GOLETA SANITARY DISTRICT

Kamil S. Azoury, PE
General Manager/District Engineer

Cc: kw
Response to Comment R-44-1. The discussion of the planned upgrade to the GSD waste water treatment plant (p. 4.15-2) has been amended as follows:

According to District Staff the District is currently in the design phase of improvements to the wastewater treatment plant so that all of the wastewater discharged through the outfall would meet secondary standards. Following these improvements, will also enable the District will continue to have the capacity to produce up to approximately 3,300 AFY of to reliably increase the production of recycled water to about 3,300 AFY. Increasing that capacity would require, assuming there are customers—both demand for the recycled water and also assuming approval from relevant regulatory agencies which include the Regional Water Quality Control Board and the federal Environmental Protection Agency (EPA). The District plans to complete the improvements to the treatment plant by 2014.

Response to Comment R-44-2. A. The comments regarding permit applications now and in the future are noted.

B. The text on page 4.15-14 has been amended to read as follows:

While the University’s wastewater flow at LRDP buildout is projected to exceed the University’s ownership share of the capacity in the treatment plant, because the treatment plant will still have excess capacity in 2025 the plant will not need to be increased in size. The University will negotiate with GSD and/or GWSD to purchase additional treatment plant capacity. In any event, the treatment plant’s NPDES permitted capacity will need to be expanded to serve new development within the GSD with or without the 2008 LRDP, but. This regulatory action is distinct from the planned physical upgrade project, which is subject to environmental review under CEQA. Increasing the plant’s NPDES permit capacity, by contrast, will not involve any physical changes that could have a significant effect on the environment. Any changes would consist of replacing equipment within the existing facility.

C. The 2.54 MGD figure in Table 4.15-5 was an estimation based on the information available in the cited 2006 study. The GSD’s present intent not to not sell remaining capacity is noted in the EIR on page 4.15-14.

Response to Comment R-44-3. The following text has been corrected:

- Cumulative wastewater flows for the Goleta Sanitary District will fall within the treatment plant’s design capacity, but will exceed the remaining NPDES capacity at buildout of other land as well as buildout of that portion of the 2008 LRDP that falls within the District.

Response to Comment R-44-4. Comment noted.
The Goleta Loop Concept:
(A light rail system that circles the SB Airport property)

Our South Goleta community has a unique opportunity to build a better future by installing useful mass-transit at a reasonable cost. Connecting large numbers of riders to useful destinations using a modern light rail system is more than possible; it is needed!

South Goleta has unique features related to the usefulness of mass-transit in general. Concentrations of the populace are pronounced while the needed destinations are remote. The SB Airport is surrounded by Goleta City. UCSB and I V are on a peninsula with limited area, limited access, and plenty of people. Old Town is disconnected from most of the City’s population making economic vitality very difficult. This flat area is the ideal setting to develop a light rail system sponsored by all of the benefactors.

The Goleta Loop’s description can start with a Loop Station located beside the Amtrak Train Station then, traveling clockwise, it connects to Old Town, SB Airport, Goleta Beach, UCSB, Isla Vista, The Marketplace, and back to Amtrak. Additional stops and alternate track routes should be considered.

Government cooperation with funding from the aforementioned entities running the system as a public service would be a wise community investment. UCSB and I V planners could discourage automobile ownership and usage. Parking could be located away from the crowded destinations. Air travelers, commuters, and tourists could arrive in Goleta using Amtrak. Old Town and The Marketplace would benefit economically from increased access for locals, students, and tourists. The exact route for the tracks would be discussed further by the planners who agreed to participate for the greater good.

To get the train rolling each entity involved should be asked first to locate a station using their own planning process. As a startup, the stations can be used for buses and then evolve into the double tract light rail system running in both directions. Easements can be planned and acquired although much of the property is Airport and/or undeveloped making easement costs rather low. Station locations and easements are the keys.

The attached map shows a general path for the tracks with the circles being the general location of the Loop Stations. The map is conceptual but the route shown attempts to avoid automobile traffic conflicts and major construction costs by keeping creek crossings to a minimum, by sharing existing easements, and by using existing overpasses.

A transportation system that makes car use and ownership less necessary will benefit everyone including the several entities that should be working to mitigate Goleta’s current traffic congestion and parking issues. The Goleta Loop will also build community identity and addresses many human, economic, environmental, and community needs making Goleta a mass transit standout among smaller cities. Why not visualize the future and act now?

Please forward this document. All aboard!

John Olson, Zjolson@aol.com, 685-5761

1/1/2009
Letter R-45
John Olsen

1/1/2009

Response to Comment R-46-1. Please see responses to comments A-12-48 and A-13-1.