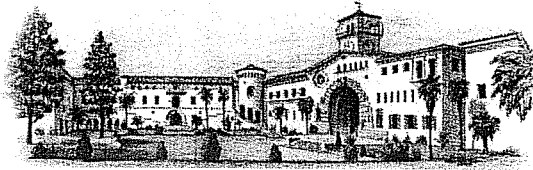


County of Santa Barbara

Michael F. Brown
County Executive Officer



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Executive Office

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

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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 mitigated¹. 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

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

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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.

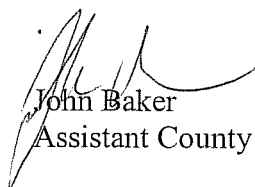
In the weeks and months ahead, the County anticipates meeting with UCSB to develop a comprehensive agreement that will fully mitigate the impacts the County would bear as a direct and indirect result of the 2008 LRDP. The County is eager to collaborate with UCSB as the 2008 LRDP and DEIR are being revised 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,



John Baker
Assistant County Executive Officer

Attachments:

Attachment A: County of Santa Barbara Comment Letter; *DEIR Vision 2025 UC Santa Barbara*

Attachment B: *Fiscal Impacts of University of California, Santa Barbara's Long Range Development Plan: Economic & Planning Systems, Inc. June 2008.*

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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

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Attachment A:

Santa Barbara County Comments on the
Draft Environmental Impact Report (DEIR)
2008 UC Santa Barbara Long Range Development Plan (LRDP)
State Clearing House Number: 2007051128

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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 [c]onnection 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.¹ 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 additional 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 detrimental 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 as 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



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 adequate 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 threats 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 analyze 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, 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 (IHMMMS) 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 identified 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.
(Fire, page 4.6-10)

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.
(Fire, page 4.6-11)

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.
(Fire, page 4.6-12)

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.
(Fire, page 4.6-13)

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.
(Fire, page 4.6-13)



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 CCRWQCB 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. With-out 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 policies 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 LRDP 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 of 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 quiet 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:

- 21,410 Students (Enrollment headcount, UC Santa Barbara, “2007-08 Campus Profile”, page 1, <http://bap.ucsb.edu/IR/07-08/cp2007.pdf>)
- 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 be 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 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 month². 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 reoccurring 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
(Page 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 area without connectivity to the UCPD facilities. This scenario augments the need of officers for the total population of Isla Vista.
(Page 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.

(Page 4.11-2; Sheriffs Department)

PUB 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.

(Page 4.11-16; Sheriffs Department)

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 fee³ (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 on-going 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 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 fee⁵ (AB 1600) for Public Administration, Libraries, and other County departments⁶ 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 \$4,040,900⁷ 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).

(4.12-14; Parks, OLRP)

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:
 - 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.
- (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 fee⁸ (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.
(Page 4.13-1, Public Works)

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.
(Page 4.13-3, Public Works)

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.
(Page 4.13-3, Public Works)

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.
(Page 4.13-3, Public Works)

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.
(Page 4.13-3, Public Works)

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.
(Page 4.13-4, Public Works)

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.
(Page 4.13-4, Public Works)



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 on 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 a 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 fee⁹ (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 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.



COUNTY OF SANTA BARBARA
DEPARTMENT OF PUBLIC WORKS
Transportation Division

2008 UCSB LRDP Transportation Mitigation Payment Calculation
May 22, 2008

	Projected Required Mitigation Projects	Estimated Cost
	ROADWAYS	
1	Los Carneros Road Widening	\$4,000,000
2	Phelps Road Extension	UCSB
3	Fowler Road Extension	City of Goleta
4	Storke Road Widening	\$4,000,000
5	Hollister Widening from San Antonio Road to SR 154	\$19,700,000
6	Turnpike Road Widening from Calle Real to Cathedral Oaks Road	\$6,500,000
7	US 101 Widening – 6 Lanes from Storke Road to Fairview Road	Caltrans
	SUB-TOTAL:	\$34,200,000
	INTERSECTIONS	
8	Los Carneros Road/Mesa Road Intersection Improvements	\$2,750,000
9	Hollister Avenue/Storke Road Intersection Improvements	City of Goleta
10	El Colegio Road/Storke Road Intersection Improvements	\$2,500,000
11	Turnpike Road/Calle Real Intersection Improvements	\$2,000,000
12	Hollister Avenue/Patterson Avenue Intersection Improvements	\$2,500,000
13	Hollister Avenue/Storke Road Intersection Improvements	City of Goleta
14	Hollister Avenue/Los Carneros Road Intersection Improvements	City of Goleta
15	Traffic Signals – Various Locations (4 Intersections)	\$1,800,000
	SUB-TOTAL	\$11,550,000
	NEIGHBORHOOD TRAFFIC MANAGEMENT	
16	Traffic Calming Devices	\$750,000
	SUB-TOTAL:	\$750,000
	INTERCHANGES	
17	US 101/SR 217/Patterson Avenue Interchange Improvements	Caltrans
18	US 101/Storke Road/Glen Anne Road Ramp Intersection Improvements	Caltrans
19	US 101/Los Carneros Road Ramp Intersection Improvements	Caltrans
20	US 101/Fairview Road/Calle Real Interchange Improvements	Caltrans
21	US 101/Turnpike Road Ramp Intersection Improvements	Caltrans
22	US 101/Hollister Avenue Interchange Improvements	Caltrans
	ISLA VISTA	
23	Embarcadero Loop Roadway Improvements	\$4,000,000
24	El Embarcadero Roadway Improvements	\$1,500,000
25	Camino Pescadero Roadway Improvements	\$4,000,000
26	Sabado Tarde Roadway Improvements	\$3,000,000
27	Camino Del Sur Roadway Improvements	\$4,000,000
28	Pardall Road from Embarcadero Del Norte to UCSB	\$1,500,000
29	Del Playa Drive Roadway Improvements	\$3,500,000
30	Embarcadero Del Norte/Pardall Road Intersection Improvements	\$1,750,000
31	Embarcadero Del Mar/Pardall Road Intersection Improvements	\$1,750,000



32	El Embarcadero Intersection Improvements	\$1,250,000
33	Isla Vista Traffic Calming	\$2,500,000
34	Isla Vista Sidewalks – Sidewalk In-Fill Various Locations	\$20,170,000
SUB-TOTAL:		\$48,920,000
BIKEWAY IMPROVEMENTS		
35	San Jose Creek Class I Bike path - Cathedral Oaks to Hollister	\$3,730,000
36	San Jose Creek Class I Bike path - Hollister Ave. to Goleta Beach	\$3,850,000
37	Ekwill St. Class I Bike path - Ekwill to Maria Ygnacia Creek	\$717,000
38	Patterson Ave Class II Lanes-Hollister Ave to Atascadero Creek Bike Path	\$523,000
39	Patterson Ave Class II Lanes - Cathedral Oaks to Calle Real	\$400,000
40	Obern Trail - Pedestrian Trail, Bikepath	\$145,000
41	San Antonio/Maria Ygnacia - Class I Bike path Improvements	\$841,000
42	San Pedro Class I Bike path - From Fowler Road to Goleta Beach	\$1,480,000
43	Bike Racks and Bike Lockers - Various Locations	\$10,000
44	Bikeway Signage Program-Continue On - Going Bikeway Signage Program	\$12,500
45	Class I Bikeway Lighting - Illuminate Key Class I Facilities	\$840,000
SUB-TOTAL:		\$12,548,500
TRANSIT IMPROVEMENTS		
46	Purchase Battery Chargers - 5 Battery Chargers for Recharging Shuttles	\$50,000
47	Purchase of Shuttles - New Transit Route, Patterson/Turnpike-4 Shuttles	\$810,000
48	Purchase of Busses - New Transit Route, Santa Barbara/Fairview Express	\$232,000
49	Purchase of Busses - 2 New busses to maintain Trunk Line Level of Service	\$310,000
50	Bus Stops - Construct Bus Stops, Turnouts & Pavement Reinforcement	\$240,000
51	Passenger Boarding Improvements - Provide ADA Access Improvements	\$200,000
SUB-TOTAL		\$1,842,000
SIDEWALK IMPROVEMENTS		
52	Hollister Avenue, Puente Drive, Etc.	\$1,380,511
SUB-TOTAL:		\$1,380,511
PLAN ADMINISTRATION		
53	Model, Cost Estimates and Fee Calculation Updates	\$450,000
54	Project Study Reports	\$625,000
55	Future Plan Administrative Costs	\$625,000
SUB-TOTAL:		\$1,700,000
TOTAL:		\$112,891,011

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



LRDP Proposed Apartments	2,961
Sub-Total:	\$22,470,734
0.52 PHTs/Townhouse x Revised GTIP Fee	\$6,365
LRDP Proposed Townhouses	1,874
Sub-Total:	\$11,927,793
2.54 PHTs/1000 Sq. Ft.	\$31,090
Proposed Square Feet (1000s)	1,800
Sub-Total:	\$55,962,019
Total UCSB LRDP Transportation Mitigation Payment*	\$90,360,545

*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.



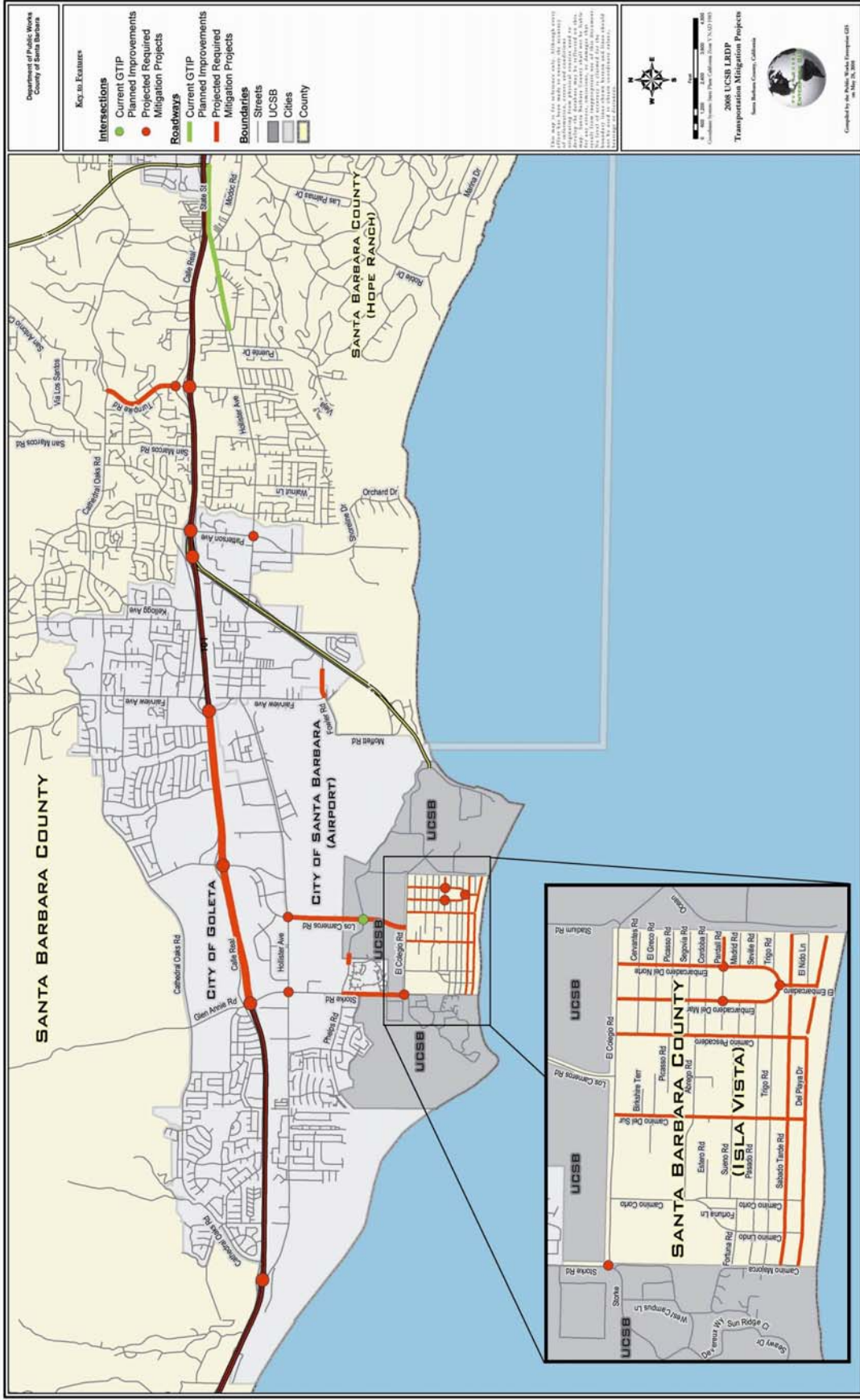


Figure 1: 2008 LRDP DEIR Transportation Mitigation Improvement Projects



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.



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.
(Page 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.
(Page 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.
(Page 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 Carneros 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 Carneros has been finalized. UCSB impacts to this section of roadway/intersections, assuming existing conditions, should be determined.
(Page 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.
(Page 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.

(Page 4.13-66 to 4.13-73, Figure 4.13-8A-B, 4.13-9A-B, 4.13-10A-B and 4.13-11A-B, Public Works)

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



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.
(Page 4.13-91, Public Works).

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” in to 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” in to 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.

(Page 4.13-116, Public Works)

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.

(Page 4.13-116, Public Works)

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.

(Page 4.13-116, Public Works)

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.

(Page 4.13-116, Public Works)

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.

(Page 4.13-116, Public Works)

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.

(Page 4.13-116, Public Works)



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” in to 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” in to 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, OLRP)

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, OLRP, 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.



4.14. Water Supply

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.

(Page 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 an 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.

(Page 4.16-13-15; Public Works, Resource Recovery and Waste Management)

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 foodwaste
- 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 inadequate 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 LRDP 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 LRDP 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 freshmen¹⁰.
- 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.

(Page 6.0-3, OLRP)

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.

(Page 6.0-3, OLRP)

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.

(Page 6.0-3, OLRP)

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.

(Page 6.0-4, OLRP)



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>

