



**Agenda Item C.4**  
**DISCUSSION/ACTION ITEM**  
**Meeting Date: June 17, 2008**

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**TO:** Mayor and Councilmembers

**FROM:** Steve Chase, Director, Planning and Environmental Services

**CONTACT:** Dan Nemechek, Senior Planner

**SUBJECT:** UCSB Draft Long Range Development Plan and  
Draft Environmental Impact Report

**RECOMMENDATION:**

It is recommended that the City Council authorize the submittal of formal comment letters to the University of California - Santa Barbara, regarding its Draft Vision 2025 Long Range Development Plan and associated Draft Environmental Impact Report.

**BACKGROUND:**

Last March, UCSB released for public comment its Draft Vision 2025 Long Range Development Plan (LRDP) and associated Draft Environmental Impact Report (DEIR). Release of the documents triggered a statutory comment period of 45-days. UCSB subsequently extended the comment period another 45-days. The comment deadline is now June 23.

The LRDP involves development, redevelopment and conservation of land owned or managed by UCSB, through the year 2025. The project replaces an LRDP adopted in 1990.

The development potential under the LRDP includes the following elements:

- A planning time frame from 2008 to 2025;
- 5,000 additional students at a rate of 1% per year, thereby increasing student enrollment from roughly 20,000 current to 25,000 future;
- 336 additional faculty, thereby increasing faculty employment from 1,054 current to 1,400 future;
- 1,400 additional staff, thereby increasing staff employment from 3,631 current to 5,031 future;
- 1.8 million assignable square feet of additional instruction, research and support space, thereby increasing assignable square feet from 2.7 million current to 4.5 million future;

- Another way of putting it is 2.5 million gross square feet of additional instruction, research and support space, thereby increasing gross square feet from 3.8 million current to 6.3 million future;
- 5,443 net additional single student bed spaces, thereby increasing single student bed spaces from 5,679 current plus 973 pending to 12,095 future;
- 239 net additional student family units, thereby increasing student family units from 553 existing plus 151 pending to 943 future;
- 1,874 additional faculty and staff housing units, thereby increasing such units from 65 existing faculty units plus 161 pending faculty units to 2,100 faculty and staff units;
- 124,000 square feet of neighborhood commercial space within the housing projects, whereas none exist today;
- 5 additional acres of recreation fields, added to 26-acres current, for a future total of 31-acres; and
- 5,100 replacement parking spaces plus 3,650 new spaces, thereby increasing parking spaces from 10,580 current to 14,230 future.

## **DISCUSSION:**

Two comment letters have been prepared by staff for consideration by the City Council, one each on the LRDP and the DEIR. Authorization is being sought for signature by the Mayor and City Manager, respectively. Both letters have been reviewed by the Council's Town & Gown Committee, made up of Mayor Bennett and Councilmember Onnen.

A key consideration is whether the facts, variable assumptions and assertions that run throughout the LRDP and DEIR have been adequately thought-through and documented. Unfortunately, staff concludes that the documents assume away critical problems that the region is facing today and will continue to face throughout the planning period of 2008 – 2025. Of particular note are concerns about the ability to provide sufficient on-campus housing to match and pace growth in population and buildable space, the capacity of public safety systems to readily accommodate that growth, and traffic and circulation impacts that we believe are understated. There are many issues at-hand, but those issue areas, in particular, have spillage affects on Goleta and the valley as a whole that cannot be assumed away.

Simply put, the DEIR needs further work and recirculation and the LRDP needs to incorporate mitigation measures accordingly.

It needs to be acknowledged that as more information comes forward, the substantive issues, text and tone of the attached comment letters may change.

It should be noted that the City has received numerous letters and comments from local residents, most notably from the Storke Ranch housing development. Staff has met with the representatives from Storke Ranch and, where appropriate, has included some of their remarks and concerns into the attached letters.

A significant issue for Storke Ranch is the proposed extension of Phelps Road necessitated by future development anticipated in the LRDP. The City has not taken a position on the extension of this east-west corridor, in part because the proposal is consistent with the City's General Plan Transportation Element and could become a necessary and critical component of future circulation improvements in town. That said, it is worth noting that there is no current project planned for the extension of Phelps and both the City and the University would have to work together to approve such an extension were it to occur.

In closing staff asks that the City Council carefully review the attached comment letters to make certain that they cover the substantive issues in terms of content and tone. The City Council may also want to authorize the Town & Gown Committee to amend the comment letters, should new information or understandings arise prior to the June 23<sup>rd</sup> submittal deadline.

**GOLETA STRATEGIC PLAN:**

Review and comment of the LRDP and DEIR is consistent with the Strategic Plan goal, "Advance Goleta's interests with other jurisdictions." Specifically, the attached comment letters meets the Objective "Represent City's Interests."

**ALTERNATIVES:**

Failure to provide comment on the LRDP and DEIR may limit the City's future ability to comment and pursue legal remedies on these important matters should that become necessary.

**FISCAL IMPACTS:**

Funding is provided in Program 4300 (Advance Planning) of the adopted FY 2007–2009 budget for the review of outside agency plans and programs.

Submitted By:

Reviewed by:

Approved By:

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Steve Chase  
Planning & Environmental  
Services Director

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Michelle Greene  
Admin. Services Director

\_\_\_\_\_  
Daniel Singer  
City Manager

**ATTACHMENTS:**

1. Comment Letter on Draft Vision 2025 Long Range Development Plan
2. Comment Letter on Draft Environmental Impact Report

## **ATTACHMENT 1**

Comment Letter on Draft Vision 2025 Long Range  
Development Plan



June 17, 2008

Mr. Tye Simpson, Director of Campus Planning & Design  
University of California Santa Barbara  
Santa Barbara, CA 93106-1030

**CITY COUNCIL**  
Michael T. Bennett  
Mayor

Roger S. Aceves  
Mayor Pro Tempore

Jean W. Blois  
Councilmember

Eric Onnen  
Councilmember

Jonny Wallis  
Councilmember

**CITY MANAGER**  
Daniel Singer

**Re: Comments on Draft *Vision 2025 Long Range Development Plan (LRDP)***

Dear Mr. Simpson:

The City of Goleta would like to express its appreciation for the presentation on the University's Draft *Vision 2025 LRDP* made at the City Council meeting of April 1, 2008. The City has reviewed the draft document and would like to provide the comments set forth in this letter for your consideration. Goleta's comments on the Draft EIR are being provided by a separate letter.

**Key Issues.**

1. Pace of Housing Development: Adoption of the LRDP in the current form would allow the full enrollment increases to be realized along with the associated increases in faculty and staff, with no guarantee that required housing (necessary to avoid impacts to the surrounding communities) will be available. The LRDP does not contain *any* binding or measurable provisions to ensure that development of the proposed on-campus housing is not outpaced by the proposed 5,000 new students, the 1,736 new faculty and staff, and expansions of academic and support space.
2. Enrollment Potential: The LRDP substantially under estimates the enrollment potential created with construction of the proposed academic and support space assignable square footage (ASF).
3. Land Dedicated to Recreational Land Use: The amount of new land dedicated to recreational land use in the LRDP (net four acres) is disproportionate to the 25% increase in student enrollment and the 37% increase in faculty and staff, and appears to be inconsistent Coastal Act Section 30255.
4. Off-campus Street and Highway Improvements: The LRDP does

not explicitly acknowledge or adequately address the University's obligation to assist with off-campus street and highway improvements, necessary to accommodate the proposed on-campus growth. This is of significant concern to the City and must be resolved accordingly.

5. Public Safety: The LRDP needs to provide funding and capital improvements in the areas of law enforcement and fire protection, commensurate with growth in population and buildable space.
6. Neighborhood Compatibility: The LRDP also needs to incorporate neighborhood compatibility measures to mitigate the size, bulk, scale and density of development that is proposed near the Storke Ranch residential tract. Matters such as noise, light, glare, height, aesthetics, and traffic are of particular concern.

### **General Comments.**

7. The document should state, at the appropriate place(s) in the text, that all roads and highways which provide vehicular access to the campus (and to Isla Vista) traverse through Goleta. Therefore, increases in traffic as a result of growth envisioned by the LRDP (as well as by planned growth in Isla Vista) will be experienced on streets and at intersections within Goleta.
8. The LRDP does not propose to increase, through new acquisitions, the amount of campus land beyond that existing as of 2007. The City supports this approach, but notes that all growth envisioned by the LRDP will, therefore, be realized through increased densities by developing presently vacant or open lands and by redeveloping properties with existing structures with new structures that are substantially larger and higher. Although higher densities may have certain virtues, they also create greater challenges in terms of designing quality environments that meet all human needs and minimize the potential for social problems. In times of scarce public financial resources, there are concerns that available resources will not always be sufficient to meet the higher standards and costs required to create quality high-density environments.
9. The extent of reliance by the LRDP on redevelopment of property with existing capital improvements does not adequately acknowledge that the costs of such redevelopment are generally higher per unit of net additional floor area created.
10. The LRDP's proposed increases in the number of students, faculty, and staff were assumed in the studies related to the *Goleta General Plan / Coastal Land Use Plan* adopted by the City Council in 2006. However, the Goleta planning documents assume that only a fraction of the University's growth will be accommodated by on-campus housing, and that substantial amounts of students, faculty, and staff will need to be housed in nearby communities, including Isla Vista and Goleta.

## **Section B: Context**

11. Page B.3 Under City of Goleta Comprehensive Plan, add “, adopted in 2006.” At the end of the first sentence.
12. Page B.4. Add “Fairview Avenue and other local streets” after Storke Road. University-related traffic affects numerous streets in the City, not just those that provide direct access to the campus entry points.
13. Page B.4. Under Ellwood-Devereaux Coast at the end of the last sentence insert: “, the acquisition of which was accomplished by the City of Goleta in 2005.” The map in Figure B.2 needs to be updated to show City ownership of the Ellwood Mesa (Sperling Preserve) property and lands traded to SB Development Partnership (Comstock Homes) that were formerly part of SB Shores Park.
14. Page B.5. Under discussion of the *Isla Vista Master Plan*, the description appears to suggest that the IV plan is intended to accommodate growth in the student community, but the LRDP proposes to house all additional students, faculty, and staff on campus lands.
15. Page B.9. Under “Leaseholds,” the document states that the Venoco lease expires in 2016, at which time the property will be returned to open space. Elsewhere the document further provides that the lease will not continue past 2016. The City supports these provisions of the LRDP, including the return of the site to open space as soon after 2016 as possible given the decommissioning of the Marine Terminal facilities and clean-up of the site.
16. Page B.17. Under “Parking,” the text refers to average parking use whereas Table B.7 refers to “Peak” parking use. Clarification is needed as to which is correct.
17. Page B.17. Under “Alternatives,” the data indicate that of the students who commute to campus other than by bicycling or walking (which is to say commuting by students that live in Goleta or other communities rather than those that live on campus or in Isla Vista) two-thirds commute by single-occupant vehicle and only 1/3 commute to campus by bus or carpools. The document needs to provide greater emphasis on additional measures that will promote use of bus transit and carpools, since present measures directed to students living in these off-campus areas are not as successful as they should be.
18. Pages B.18 and 19. Under “Sustainability,” the LRDP fails to note that various green initiatives are overshadowed by the proposal to substantially increase ASF per student. The proposed greater amount of ASF per student will have the effect of offsetting many of the benefits of green building technology.

## **Section C: Framework**

19. Page C.3. Table C.1 should state enrollment change since the 1990 LRDP, rather than from 1995 to 2007.

20. Page C.3. Under “State and Community Context,” the last sentence should be changed to read “... new companies in the Santa Barbara – Goleta area.”
21. The LRDP does not adequately explain or justify the reasons for such a major expansion of building space per student (a 260% increase per student). If the proposed net increase in ASF were occupied with the same ASF per student as the present (2007) enrollment, the proposed net increase in building space would accommodate an additional 13,000 students. The City has concerns that the proposed building space, if built, could result in a much larger future increase in enrollment (and faculty) than is set forth in the LRDP, with correspondingly greater impacts on adjacent communities, including Goleta. The LRDP substantially understates the enrollment capacity of the proposed total ASF of building space. The text refers to “current shortfalls” but does not provide any data, comparative or otherwise, to justify this statement and the fact remains that the current enrollment is (and the future growth could be) accommodated with 136 ASF per student even if not considered optimal.
22. Page C.7. Under “Planning,” the document states that existing campus development does not reflect the values sought because of the narrow focus of the University’s past funding and implementation processes on individual buildings to the detriment of important overarching goals. This apparently reflects a major failure of the 1990 LRDP or at the least a failure in its implementation. The LRDP does not provide any explanation of the methods by which a different (and better) result will be secured with the LRDP. A sense of “overall order or consistent quality” will be of even greater importance in implementing the LRDP because of the significant increase in campus density that is proposed.
23. Page C.8. The last paragraph under “Planning” states that the LRDP represents a major commitment to campus housing by proposing to house all additional students, faculty and staff in new on-campus housing. While this may be a worthy goal, it appears to be an unrealistic one, since only about 30% of students and 6% of faculty (21% if approved but unbuilt units are included) were accommodated in on-campus housing in 2007 and no units (0%) were set aside for the 3,631 non-faculty staff. The Draft LRDP does not explain how it is plausible for the University to increase the number of student beds by 5,443 (from 6,652 to 12,095), the number of faculty and staff units by 1,874 (from 226 to 2,100). These represent increases of 82% and 829%, respectively, in the number of student beds and faculty/staff units over the amounts existing (and approved) as of 2007. To suggest that development of anywhere near these numbers of units is a priority is grossly misleading in an era which is likely (as in the past) to be characterized by scarce financial resources. A much more likely outcome is that greater priority will be placed on construction of new academic and support space, with housing substantially lagging behind. The effects of this misleading scenario is to create an artificial and unrealistic “project description” for evaluation in the EIR that will drastically understate the likely impacts on Goleta and other nearby communities. In fact, the document states (on Page C.9) that all of the development proposed in the DRDP will not be complete by 2025.



However, the LRDP, once adopted, would allow the full enrollment increases to be realized along with the associated increases in faculty and staff.

#### **Section D. Land Use and Development**

24. Page D.3. The data in Table D.1 indicate that 81 acres are proposed to be devoted to recreation land use, while the data in Table B.1 indicate that in 2007 there were 77 acres of land used for recreation. The proposed net increase of four (4) acres of recreation land to serve an additional 5,000 students and 1,736 faculty and staff (plus their families), all of whom are proposed to be accommodated in on-campus housing, is disproportionately small and unbalanced. The data represent an increase of only 5% in land designated for recreation use compared to increases of 25 % in the number of students and 37% in the number of faculty and staff. These latter percentages would be even higher if they were based on the numbers housed in on-campus housing, which are the more likely users of on-campus recreational space. As a result, it appears that the proposed LRDP is inconsistent with Coastal Act Section 30255.
25. Page D.3. The data in Table D.1, when compared with the data in Table B.1, also indicate that there is no increase in the amounts of land to be set aside for open space type uses (the open space, environmentally sensitive habitat areas, Coal Oil Point Reserve, and Coal Oil Point Reserve/ESHA classifications in Table B.1). Given the substantial increases in campus population (6,736 plus families of faculty and staff)), these valuable and sensitive areas are likely to be subjected to much greater levels of use and an increased potential for degradation of the resource values.
26. Page D.7. Under “Development,” (Academic and Support and Housing), the comments set forth above in items 15 and 17 apply to these sections, as if fully set forth again under this item.
27. Pages D.7 through D.15. Large portions of the proposed new facilities are proposed to be created through redevelopment of land with existing structures, which would need to be demolished to make way for the new construction. The LRDP fails to adequately take into account the fact that redevelopment is more expensive relative to development on vacant land due to the costs of demolition and to the removal of capital assets that have to be replaced. To obtain the net increase in building area, the new building must replace the existing space plus construct the net additional floor area. Thus redevelopment is inherently more costly (on a net additional ASF basis), and may be difficult to justify in times of scarcity of financial resources. The LRDP’s reliance on massive redevelopment of existing campus facilities appears unrealistic, at least in the year 2025 time frame of the plan.

#### **Section E. Transportation and Parking.**

28. Page E.3. The LRDP does not explicitly acknowledge or adequately address the University’s obligation to assist with addressing the off-campus street and highway improvements that will be necessary to accommodate the proposed on-campus

growth without significant congestion and deterioration in the levels of service on those roads (and their intersections) that provide access to the campus. The document should note in the text that all streets and highways that provide access to the campus (and to the IV community) pass through the city of Goleta.

29. Page E.7. The LRDP states that housing all future increases in students, faculty and staff within a mile of the main campus will reduce the need for more commuter parking spaces. This statement will be partially correct only to the extent that the University succeeds in securing funding to construct the on-campus housing units proposed. As stated above, the City of Goleta concludes that this is not the most likely outcome. To the extent that new housing development does not keep pace with the development of other on-campus space, additional demands for commuter parking will be experienced. The City is concerned that if insufficient parking is provided on-campus, there will be spillover to adjacent communities, including Goleta. This condition already occurs on an occasional basis during campus special events.
30. Page E.8. The City is concerned that insufficient quantities of parking are being proposed for the new faculty, staff, and married student residential units. The parking ratios used are less than those required by the City for equivalent off-campus residential projects in Goleta. Goleta's experience is that the parking ratios required are needed and do not result in surplus, unused parking spaces.
31. Page E.9. Under "Coastal Access" the document's reference to coastal access parking to be provided adjacent to the North and West campuses is irrelevant to the determination of the University's obligation to provide additional parking spaces dedicated exclusively to public coastal access as a consequence of the substantial growth planned by the University. Since the referenced parking is outside the boundaries of the LRDP, these statements should be deleted. It is noted that the University charges (through meters or parking fees) for use of many of its parking spaces supposedly dedicated for coastal access, whereas nearby communities such as Goleta provide such dedicated public coastal access parking without cost to users.
32. Page E.9. Under "Coastal Access" the 4<sup>th</sup> paragraph refers to the Anza and Coastal Trails. The latter part of this sentence should be revised to read "...connect with the bluff-top coastal and Juan Bautista de Anza trails that traverse the City of Goleta's Sperling Preserve and Santa Barbara Shores Park."
33. Page E.11. The proposed limitations on use of coastal access parking spaces (in policies Trans-4 and Trans-10) are too restrictive, vague, and open ended; their effect could be to unreasonably restrict or prohibit use of public coastal access parking spaces.
34. Page E.12. The policies should include acknowledgement that an additional 6,736 on-campus residents (plus the additional population comprised of families of faculty and staff) will generate a substantial increase in needs for coastal access facilities and explicitly state the access improvements that are proposed to accommodate that

increased demand in a manner that will not result in degradation of coastal access facilities or natural resources. This increased usage will also be experienced in nearby community coastal access facilities, including those of the City of Goleta, particularly at the Sperling Preserve and Santa Barbara Shores Park.

### **Section F: Open Space and Landscape**

35. Page F.8. Statements under the topic “Campus Policies” indicate that policies of the Draft LRDP require the removal of the Ellwood Marine Terminal by 2016 and restoration of the area as a “nature park.” The City of Goleta supports these policies and the restoration of the site to natural open space.
36. Page F.8. Policy ESH-4 appears to allow removal of non-native trees such as eucalyptus if the trees do not provide habitat for a rare or sensitive species. The City of Goleta has concerns that this policy would allow destruction of trees that provide habitat for monarch butterflies, including roosting sites, since monarchs are not listed as a rare or endangered species. Monarchs are, however, a species of great local importance because of the size of the “Ellwood Complex” over-wintering site, which is one of the largest in the state. This complex includes the Ellwood Main site on the City’s Sperling Preserve and the adjacent Coronado Monarch Preserve of the Land Trust for Santa Barbara County. Monarch specialists have concluded that all of the related temporary roosting sites in the Ellwood complex are important for the preservation of the Ellwood Main site. The size of the western Monarch population is especially vulnerable to changes in or destruction of its over-wintering sites because of the limited number of locations that provide all of the factors necessary for a viable site.
37. Page F-15. Policy MAR-6 refers to development of a “Final Open Space Management Plan” for the Ellwood-Devereux area. Each jurisdiction’s final California Coastal Commission-certified coastal land use plan (or the LRDP in the case of the University) will in effect constitute the “Final” plan. There is no separate multi-jurisdictional document that needs to be prepared outside the context of the Commission-certified documents. This policy statement needs to be revised accordingly.

### **Section G: Utilities and Infrastructure**

38. Page G.2. The “Water” section does not address the question of the amount of water supply that is needed to accommodate an additional on-campus population of 6,736 students, faculty, and staff (plus the family members of faculty, staff, and married students). Nor does it address whether sufficient water supply is presently allocated by GWD or whether additional allocations will be needed. The effects of allocations of additional water on other existing and future customers of the GWD need to be acknowledged as an issue.
39. Page G.3. Policy HAZ-7 should be stronger and indicate that the University will work with the County Energy Division to insure that permitting for decommissioning the Ellwood Marine Terminal is commenced with sufficient time to complete the process

by the date of expiration of the lease. The policy should also note that the financial and other obligations associated with decommissioning and restoration of the site are those of the leaseholder. The policy should note the requirement for submission of a detailed decommissioning plan prior to consideration of necessary permits.

### **Section H: Implementation**

40. Page H.16. Under “Monitoring” and in appropriate sections of the implementation procedures, the document needs to include a detailed statement of the requirement for a LRDP consistency report for each construction project that requires Board of Regents and/or California Coastal Commission action or approval. As a minimum, this monitoring report should include the following items: a) the balance between the amount of ASF that has been approved/constructed to date and the amount of student, faculty, and staff housing that has been approved/constructed and any accumulated shortfall in the required number of beds/units; b) any change in the net ASF per student as a result of the project; c) monitoring of traffic volumes and LOS at key road segments and intersections in the adjacent communities; d) the amount of water supply needed to serve the project, the cumulative water use of the University, with a comparison to the contracted and allocated water supply from the GWD; and e) the volumes of wastewater generated by the project and the cumulative wastewater volume generated by the University.
41. Page H.16. A mechanism that is measurable and mandatory needs to be included in the LRDP to assure that the on-campus housing development keeps pace with the new construction of building space (ASF) for academic and support activities. This is especially important since the Draft EIR presumes that all increases in the student, faculty, and staff populations will be accommodated in on-campus housing. To the extent that construction of new on-campus housing does not keep up, impacts would be commensurately greater in off-campus communities than is stated in the DEIR.

The City of Goleta appreciates the opportunity to provide these comments to the University prior to local approval of the LRDP and its transmittal to the Board of Regents and California Coastal Commission for final approvals. The City is hopeful that its comments will be adequately addressed in revisions to the document before is forwarded to these bodies, and would appreciate receiving a copy of the revised document. The City reserves its discretion to provide additional comments to those bodies at the appropriate times. The City is also providing comments by separate letter on the DEIR for the proposed 2025 LRDP. Please be advised the City has identified significant deficiencies in the Transportation and Circulation section of the DEIR and believes recirculation of the DEIR will be required. Should you have any questions or comments regarding the content of this letter, please contact Mr. Steve Chase, the City’s Director of Planning and Environmental Services. Thank you in advance for your diligent consideration of our comments.

Sincerely,

Michael T. Bennett  
Mayor

Cc: Henry T. Yang, Chancellor, UCSB  
Gene Lucas, Executive Vice Chancellor, UCSB  
Mark Fisher AIA, Associate Vice Chancellor for Campus Design & Facilities, UCSB  
Jack Ainsworth, Deputy Director, California Coastal Commission, Ventura Office  
Dan Singer, City Manger, City of Goleta  
Michael Brown, CEO, County of Santa Barbara  
James Armstrong, City Manager, City of Santa Barbara  
Kamil Azoury, General Manager, Goleta Sanitary District  
Kevin Walsh, General Manager, Goleta Water District

## **ATTACHMENT 2**

Comment Letter on Draft Environmental Impact Report



June 17, 2008

**CITY COUNCIL**  
Michael T. Bennett  
Mayor

Roger S. Aceves  
Mayor Pro Tempore

Jean W. Blois  
Councilmember

Eric Onnen  
Councilmember

Jonny Wallis  
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**CITY MANAGER**  
Daniel Singer

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

**Re: Comments on the DEIR for the 2008 Long Range Development Plan**

Dear Ms. Hummer:

The City of Goleta has reviewed the Draft Environmental Impact Report (DEIR) on the University's draft *Vision 2025 Long Range Development Plan* (LRDP) and would like to provide the comments set forth in this letter. By separate letter, the City has provided comments on the LRDP. That letter is attached, and by this reference each of the items listed in the letter are incorporated herein as comments on the DEIR.

Bottom-line, the City believes that the DEIR needs considerable re-working, followed by recirculation for further public review and comment. The reasons are explained in detail below.

**Chapter 1.0 - Introduction**

1. Page 1.0-5. The 3<sup>rd</sup> sentence in Section 1.5 reads "It (the LRDP) does not directly commit the University to specific projects, funding plans, or construction schedules." Once approved, however, the new LRDP would authorize the University to proceed with the stated increases in students, faculty, and staff. The proposal in the LRDP to accommodate all future increases in students, faculty, and staff in new on-campus housing, rather than in local communities, has the effect of substantially understating what otherwise would be significant and unmitigated environmental impacts if on-campus housing development does not keep pace with increases in students, faculty, and staff. The quoted statement expressly acknowledges that the University will not be obligated to the construction projects identified in the draft LRDP, including the housing construction. The effect would be to shift residential accommodations to off-campus locations, thereby commensurately increasing environmental effects in local communities such as Goleta. Although the goal of providing all housing on-

campus is a good one, the DEIR needs to be revised to reflect a more likely (and worst-case) scenario. That scenario involves less than 100% of all future increases accommodated in on-campus housing and/or a set of supplemental mitigation measures that would be triggered whenever it is determined by a monitoring system that on-campus housing development has not kept pace with increases in students, faculty, or staff. The City believes that the supplemental mitigation measures need to be binding obligations. Absent that control mechanism, the community impacts would have to be reclassified throughout the DEIR as significant and unmitigated.

## **Chapter 2.0 – Summary of Environmental Impacts and Mitigation Measures**

2. Page 2.0-1. The first “bullet” under project description states that the project includes an additional 2.5 million gross square feet (GSF) of academic and research facilities, whereas the Draft LRDP refers to an increase of 1.8 million assignable square feet (ASF). This data needs to be consistent with similar data in Table 3.0-6. Many impacts should be analyzed in terms of gross square feet rather than ASF. It is not clear that the impacts identified in the DEIR have in fact been based on additional GSF. In preparing its EIRs and computing impact mitigation fees, the City of Goleta uses GSF as the metric in calculations. The DEIR under-estimates impacts to the extent that ASF is used.
3. Page 2.0-2. Under “Project Objectives,” the stated objectives are not sufficiently clear or measurable. For example, the objectives do not address the proposal to substantially increase the amount of building space per student, from 136 ASF per existing student as of 2007 to 355 ASF per new student. This may be intended to address a perceived short-fall in the amount of existing space on a per capita basis. This appears to be a major but unstated objective of the project.
4. Pages 2.0-4 through 2.0-37. Changes to the table titled “Summary of Impacts and Mitigations” should be made based on the City’s comments on the various detailed sections of the DEIR as stated in subsequent sections of this letter. These are not repeated here.
5. Various Maps. The various map figures in this and subsequent sections of the DEIR do not clearly show the entire boundary of the University with the cities of Goleta and Santa Barbara. Nor do they show the county “islands” in Isla Vista and in the North Campus (Ocean Meadows area).
6. Page 3.0-10. Table 3.0-2, “Existing Assignable Square Feet by Program” should be revised to also include “Gross Square Feet by Program” since that is the appropriate metric to employ in calculating future environmental impacts of the proposed LRDP. The project description summary noted above (in item 2) uses the GSF metric.
7. Page 3.0-11. For clarity, Table 3.0-3 should be revised to include subtotals for student beds, student family housing units, faculty units, and staff units.



8. Page 3.0-13. Under “Parking and Service Access,” the discussion of “public coastal access parking” should identify the number of public spaces the university provides free (without meters or parking fees).
9. Page 3.0-19. It appears from the data in Table 3.0-4, “Student Enrollment 1995-2006,” that the University has exceeded its enrollment cap stated in the 1990 LRDP. That issue needs further clarification because it has been our understanding that UCSB has been proactive in its self regulation of the cap. The impact analysis sections need to address whether the proposed new student cap will be mandatory and binding or if it can be exceeded by an allowable factor. If it can be exceeded, the impact analysis sections need to further elucidate the additional impacts and mitigations that would be required in the event the cap is exceeded.
10. Page 3.0-25. The “Project Objectives” stated in Section 3.6 are insufficiently precise to be measurable and progress verified. Objective 3.b., for example, states that the objective is to build up to 1,800 units, not that the objective is to build 100% of the units on-campus that are needed for future increases in faculty and staff. The objective as stated could be considered fulfilled if only 10% are accommodated in new on-campus housing.
11. Page 3.0-28 through 3.0-30. The land-use data within the captions of the text do not match the data in the table (Table 3.0-7) and should be corrected to be consistent with the table. For example, recreation data is 81 acres in the table but 83 acres in the caption, academic is 203 in the table but 197 in the caption, and so on.
12. Page 3.0-34. The “Housing Program” text needs to explain the number of existing housing units and beds that are proposed to be demolished to make way for new construction as a basis for clarifying the proposed total (gross) number of new housing units and beds to be constructed. The use of the word “net” in the text is unconventional and misleading. The gross number proposed to be constructed less the number proposed to be demolished is the net increase.
13. Page 3.0-39. Table 3.0-10 does not identify all of the off-campus roadway improvements that would be needed to accommodate the proposed University growth. The rationale for inclusion of some off-campus improvements (such as Phelps Road extension) but not others is not made clear.
14. Page 3.0-39. The information in the text of the “Alternative Transportation Modes” section needs to clearly distinguish between students that live on-campus and in Isla Vista from those that are longer-distance commuters. The text is evasive when considering longer-distance commuters, (i.e. those living in Goleta, Santa Barbara, etc), but the data show that 2/3 of these commute in single-occupant vehicles, and only 1/3 use the bus, carpool, or use other alternative transportation. The picture presented in the text is skewed because of the size of the on-campus and Isla Vista populations.
15. Page 3.0-44. The description of Coastal Access is not sufficiently precise, and needs to specifically list and detail the proposed new improvements. This is particularly

important due to the very large increase in population proposed to be provided new on-campus housing (likely well over 8,000 persons when families of faculty and staff are included).

#### **Chapter 4.0: Environmental Setting, Impacts, and Mitigation**

16. Page 4.0-4. The statements under “Significant and Unavoidable” ignore the other option available under CEQA, which is to alter or modify the project itself as a means of lessening impacts such that they would fall below the applicable thresholds of significance. For example, such alterations or modifications of the proposed project could be reductions of the proposed increases in students, faculty, and staff AND/OR reductions in the amount of GSF/ASF proposed so that the proposed per-capita amounts do not exceed the existing per capita amounts by as much. If potential project modifications/revisions are not selected, the DEIR should address the reasons why such alterations or modifications of the proposed project have been determined to be infeasible.
17. Page 4.1-37. The analysis of visual/aesthetic impacts of proposed development on the Storke campus area is inadequate in that it fails to address impacts that would be experienced by residents of the adjacent Storke Ranch PUD in Goleta. This needs to be included either as a separate impact or included within impact AES-4.
18. Pages 4.1-38 and -39. The evaluation of visual and aesthetic impacts of development of the north and west campus areas fails to address the impacts experienced by users of the open space areas, including the Sperling Preserve in Goleta. Additional development and lighting visible from open space areas has the potential to degrade and adversely impact the quality of the open space experience by users of these areas compared to the existing condition.
19. All Aesthetics Impacts. The proposed mitigation measures are inadequate in that they are excessively vague and lack measurable means to reduce impacts to levels where impacts would be insignificant. The City believes that measurable and binding mitigations need to be included.
20. Pages 4.10-1 and thereafter. The DEIR does not adequately identify the total additional on-campus populations that are proposed to be accommodated by the LRDP, particularly the component of families of married students, faculty, and staff (i.e. inclusive of spouses and children). It is this total additional on-campus population -- not just the additional students, faculty, and staff-- that will generate environmental impacts.
21. Page 4.10-14 and thereafter. The SBCAG regional forecasts of housing and population need to be updated to include the most recent (2008) projections and allocations of regional housing needs. Relatively more growth is allocated to Santa Barbara and less to Goleta compared to the SBCAG Forecast 2000.
22. Page 4.10-25. “Impact POP-1” The conclusion stated in Impact POP-1 of no population impact in the off-campus area is only correct if the on-campus housing

units proposed are in fact constructed at the pace necessary to accommodate the increases in students, faculty and staff. As noted above, the DEIR states that the University is not subject to a binding obligation to construct any of the proposed facilities in the LRDP. The City believes that unless there is a measurable, binding, and enforceable mitigation measure to assure that expansions of academic and support space (and increases in the numbers of students, faculty, and staff) do not outpace on-campus housing development, there is the likelihood of significant adverse unmitigated impacts on adjacent communities, including Goleta. This would be due to the fact that those not housed on-campus would by necessity have to secure off-campus housing in the communities. The necessary mitigation appears to be feasible; that is, it would be possible to suspend further increases in the numbers of students, faculty, and staff until sufficient numbers of new housing units/beds are constructed.

23. Pages 4.10-25 to -27. The mitigation proposed (POP-2A) is inadequate in that it does not create a binding obligation to actually balance new on-campus housing with future increases in students, faculty, and staff. It merely says that the University will “work towards” achieving such balance. No measurable criteria are set forth to guide conclusions about “sufficient progress.” If the mitigation is not measurable and binding, the conclusion that the residual impact is “less than significant” is not valid, and the residual impacts would in fact remain significant.
24. Pages 4.10-27 through -29. The DEIR does not adequately address the indirect impacts of the proposed project. In the absence of other analytical data, the DEIR should use the results of the study performed by the UCSB Economic Forecast Project in 2007. The indirect effects include the increased housing demand in the region that is caused by the increased jobs and population associated with the multiplier effect in the local economy of the increases in students and on-campus jobs proposed by the Draft LRDP. It is of great importance to provide specific quantitative estimates of these indirect effects of the proposed growth at the University. Total impacts on many environmental resources will be greater when both direct and indirect impacts are evaluated.
25. Page 4.10-29. Section 4.10.2.4 does not adequately address cumulative impacts of the project. Cumulative impacts should include impacts of other non-university related growth planned in the communities (including Goleta and Santa Barbara) plus the impacts of the proposed university growth. Not all (or necessarily the major portion) of the growth planned in Goleta and other community areas is directly or indirectly related to the proposed university growth.
26. Page 4.11-15. Impact PUB-1 does not adequately address the on-campus law enforcement impacts in that it fails to acknowledge the total on-campus population increase, inclusive of spouses and children of the additional faculty, staff, and married students that are proposed to be accommodated in new on-campus housing. The impact would be significant without mitigation. Mitigation would be necessary in terms of increasing the number of campus police commensurate with the total population increase. No mitigation measure is identified and without an increase in law enforcement personnel there could be a significant unmitigated impact.

27. Page 4.11-15. Impact PUB-2. To the extent that the University fails to construct new on-campus housing commensurate with increases in students, faculty, and staff, there will be unmitigated impacts on law enforcement services in the community areas, including Goleta as well as Isla Vista. Without a measurable and binding mitigation to constrain future increases in students, faculty, and staff to just the amounts accommodated by new on-campus housing, such adverse and unmitigated impacts will occur and are not addressed in the DEIR. Impacts will be experienced in communities even if all growth is accommodated in new on-campus housing, since the additional population ventures into the community for many services and activities. Additional mitigation measures are necessary to respond to this impact.
28. Pages 4.11-16 to -18. Impact PUB-3. People, more so than buildable space, are the demand factor for fire protection services (i.e. medical emergencies, traffic accidents, structural and brush fires, and various rescues). Without a measurable and binding mitigation to match and pace future increases in students, faculty and staff, there will be unmitigated impacts on fire protection services in the community areas, particularly in Goleta and Isla Vista. Additional mitigation measures are necessary to respond to this impact.
29. Page 4.11-22. Cumulative Impact PUB-6. This impact analysis is inadequate in that it fails to address the community impacts noted above in items 27 and 28 combined with the impacts of non-university related planned growth in the communities.
30. Page 4.12-24. Impact REC-1. The data presented in the DEIR on land designated for Recreation by the LRDP is inconsistent with data in the Draft LRDP itself. Tables B.1 and D.1 in the Draft LRDP show the number of acres designated for recreation increasing from 77 existing to 81 in the future by 2025, an increase of 4 acres instead of the 6 stated in the DEIR. The analysis of impacts is inadequate in that the increase in land area for recreation is only 5%, whereas the Draft LRDP proposes increases of 25% in the number of students and 37% in the number of faculty and staff. If measured in terms of on-campus population, the percentage increases for those proposed to be accommodated are even higher, since relatively small fractions of existing students, faculty and staff live on campus. The percentages would also be even higher if the total proposed increase in on-campus population, inclusive of spouses and children of additional married students, faculty, and staff are included. By all measures, it appears that the amount of land proposed for recreation is insufficient to accommodate the future on-campus demand or need for such recreation land. Failure to provide additional recreation land commensurate with the on-campus population increase will result in a significant and unmitigated impact. In addition, failure to provide sufficient recreation land on-campus to accommodate the planned population growth will result in adverse impacts on Goleta's recreation facilities, through crowding and over-use of community recreation facilities and land.
31. Page 4.12-26. Impact REC-2. The additional proposed coastal recreation facilities (active and passive) are not sufficient to accommodate the total proposed increase in on-campus population, inclusive of spouses and children of married students, faculty, and staff (see also item 30 above and attached City comments on the LRDP). As a result, there could be overuse of existing and planned on-campus coastal recreation

facilities, as well as at Haskell's Beach, Ellwood Mesa and Goleta Beach. These impacts need to be identified and appropriate mitigation measures included in the EIR.

32. Page 4.12-27. Impact REC-3. The analysis of impact is inadequate in that it fails to take into account increased traffic and congestion on roads that provide vehicular access to beaches and other coastal resources, the insufficient proposed increases in public coastal access parking spaces, and likely overuse of coastal access points -- which also could lead to degradation of the quality of coastal resources. For example, student parking along the west end of the Goleta Beach parking lot has been a mainstay. These impacts may be significant unless additional mitigation measures are included. The DEIR fails to take into account likely spillover of demand for beaches and other coastal recreation resources into Goleta and other adjacent community areas.
33. Page 4.12-29. The City provides target standards for parks and open space in the Goleta General Plan/Coastal Plan.
34. The traffic analysis presented in section 4.13 of the DEIR is based upon a traffic model that was derived from the City of Goleta's calibrated traffic model that was developed for the City of Goleta's General Plan. The use of the City's calibrated traffic model to determine future traffic impacts associated with the LRDP is appropriate and supported by the City. However, the DEIR does not include information relating to the assumptions and methodology used in developing the LRDP traffic model on which the entire traffic analysis is based. Typically a traffic model report or memorandum that documents the methodology and assumptions used in creation of the traffic model is generated by the traffic modeling firm. The traffic model report is vital to understanding how the model results were obtained. In order to better understand the LRDP traffic model and the specific modifications made to the City's calibrated model to perform the DEIR traffic analysis, a traffic modeling report should be included in the appendices to the DEIR and circulated for public review. Without this information, the DEIR lacks adequate documentation to support its analysis and findings.
35. Since no model report or documentation on the LRDP traffic model was included in the DEIR, the City reviewed the LRDP traffic model files and compared them to the original calibrated model files to determine what changes to the City's calibrated model were made to develop the LRDP model. This included a comparison of several key traffic model features including, but not limited to, traffic analysis zones (TAZs), land use tables and trip generation tables. The comparison revealed some changes to the model that would be expected and others that are can not be easily explained. In particular, the changes to the land use and trip generation tables directly affect the amount of vehicle trips generated and the associated impacts of those trips. Given that changes to these model parameters can potentially compromise the integrity of the model's calibration, a careful examination of how the changes affected the baseline performance of the City's calibrated model is needed prior to its application for generating future year traffic forecasts. Based on the information provided in the DEIR, it is unclear that such a validation exercise was performed as part of the traffic modeling effort for the LRDP.
36. The source for the peak hour trip generation rates for the two new land use categories (Student Family Housing Units & Faculty Housing Units) used in the LRDP traffic model is not documented. Additionally, the empirical justification and data source used to modify

the peak hour trip generation rates for UCSB Students, UCSB Faculty & Staff, Student Housing Off-Campus and Student Housing On-Campus are not documented in the DEIR. A detailed description of, and the basis for, these traffic model parameter modifications performed on the City's calibrated travel model is needed.

37. The data presented in Section 4.10 Population and Housing of the DEIR cites the following UC-Affiliated Populations information for the 2006-07 academic year at UCSB:

- 21,082 Total Students (total enrollment irrespective of full or part time status)
- 20,556 Full Time Equivalent (students enrolled for at least three quarters)
- 9,500 Faculty and Staff (includes full and part time employees)
- 6,000 Faculty and Staff Full Time Equivalent

The source of this information is the annual Campus Profiles prepared by the Office of Institutional Research and Planning at UCSB. As stated in the DEIR and in accordance with the UC CEQA Handbook, total students (full and part time) and total employees (full and part time) are used for CEQA and the DEIR to analyze significant effects on the environment.

A summary comparison of the UCSB LRDP model land use inputs relative to the City's calibrated model and published UCSB data is shown below. Significant land use discrepancies between the modeling performed for the LRDP DEIR and the City's 2005 baseline exist for all three generalized land use categories germane to UCSB travel demand: students, faculty and staff, and number of dwelling units.

Land Use Parameter	UCSB IRP 2006-07	City Calibrated Model Baseline 2005	City Model General Plan 2030	LRDP No- Project <sup>1</sup>	LRDP Final 2030
Dwelling Units <sup>2</sup>	n/a	8,104	9,511	13,668	20,512
UCSB Students	21,082	19,039	25,000	16,530	18,046
UCSB Employees	9,500	9,529	11,400	4,685	6,385

<sup>1</sup>UCSB reflects baseline levels (2006-07) with all other areas reflecting 2030 conditions.

<sup>2</sup>Reflects all housing dwelling units (SF DU, MF DU, Student Housing, Student Family Housing, Faculty Housing)

n/a: Institutional Research and Planning only tracks University owned student and faculty housing.

Inputs reflects all model analysis zones (TAZ's) related to UCSB functions – including Isla Vista

The LRDP No-Project and LRDP Final modeled land use assumptions reflect roughly half the UCSB employment and roughly 3,000 – 5,000 less enrolled students than the City's 2005 baseline and UCSB's own 2006-07 Campus Profile figures. Hence, UCSB's LRDP travel model developed for the estimation of LRDP travel impacts is inconsistent with like data reported in both the LRDP and DEIR and by UCSB itself. As such the travel forecasts generated by the LRDP traffic model may underestimate both future traffic volumes associated with the LRDP and associated traffic impacts.

The LRDP No-Project and Final model land use assumptions reflect roughly 5,000 and 12,000 more dwelling units than the City's 2005 baseline and General Plan assumptions respectively. The LRDP model estimate of dwelling units equate to occupancy of 1.55 and 1.19 students/UCSB employees per dwelling unit for current and future conditions respectively. This does not appear to be a reasonable accounting of baseline or future dwelling units related to UCSB affiliated housing.

Given the aforementioned land use assumption discrepancies, travel forecasts based on these land use assumptions are questionable. The cited land use discrepancies require explanation and documentation in the DEIR.

38. An analysis of the UCSB LRDP model trip generation estimates for all model analysis zones with UCSB affiliated functions reveal large discrepancies from past calibrated modeling efforts performed by the City of Goleta. As shown below, 2030 trip generation based on the LRDP Final land use growth assumptions (for UCSB related traffic analysis zones only) is projected to be only slightly greater (378 trips) than the City’s calibrated model 2005 baseline trip generation estimate and 1,517 PM peak hour trips less than the City’s General Plan 2030 forecast. This does not appear to be a reasonable forecast of trip generation.

**Trip Generation in UCSB Related Model Traffic Analysis Zones**

Vehicle Trip Definition	City Calibrated Baseline 2005	City Model General Plan 2030	LRDP No-Project <sup>1</sup>	LRDP Final 2030
Trip Origins	4,150	4,859	4,438	5,562
Trip Destinations	3,532	4,171	3,694	4,836
Internal Trips	2,895	3,442	453	557
<b>Total Trips</b>	<b>10,577</b>	<b>12,472</b>	<b>8,585</b>	<b>10,955</b>

1. No-Project reflects UCSB baseline levels (2006-07) with all other areas reflecting 2030 conditions.

39. A review of total trip generation broken out by trip type as shown in the following table reveals a significant departure by the UCSB LRDP travel model in the percent of Home Based College (HBC) trips. The City of Goleta’s calibrated 2005 Baseline model estimates a total of 4,473 HBC trips – roughly 8 percent of total trips in the Goleta Valley. As part of its General Plan 2030 forecast, the City forecast HBC trips to grow to 5,311 trips - remaining at approximately 8 percent of total trips. The UCSB LRDP travel model forecasts significantly less HBC trips under both the No-Project and Final LRDP alternatives: 1,934 HBC trips and 2,232 HBC trips respectively. This equates to approximately half the amount of HBC trips forecast by the City’s calibrated 2005 model baseline. The percentage share of HBC trips relative to all other trip types drops from 8% to roughly 3.5%. This represents a significant departure from the calibrated model baseline – one which results in less UCSB affiliated traffic generation and associated traffic impacts.

2005 Baseline Total Trip Generation					2030 General Plan GP-1 Total Trip Generation				
Trip Type	Inter	Intra	Total	%	Trip Type	Inter	Intra	Total	%
H-W	1,848.03	18.91	1,866.94	3.51%	H-W	2,219.66	24.76	2,244.42	3.46%
W-H	10,835.33	37.70	10,873.03	20.45%	W-H	12,925.25	53.48	12,978.73	20.00%
H-O	6,633.26	268.82	6,902.07	12.98%	H-O	8,041.80	340.93	8,382.73	12.92%
O-H	7,256.65	327.79	7,584.43	14.26%	O-H	8,822.12	425.59	9,247.71	14.25%
HBC	2,873.22	1,600.21	4,473.42	<b>8.41%</b>	HBC	3,399.23	1,912.03	5,311.26	<b>8.18%</b>
NHB	15,104.65	3,077.13	18,181.79	34.19%	NHB	18,154.75	3,871.15	22,025.90	33.94%
X-X	3,298.00	0.00	3,298.00	6.20%	X-X	4,711.00	0.00	4,711.00	7.26%
	47,849.13	5,330.55	<b>53,179.68</b>	<b>1.00</b>		58,273.81	6,627.94	<b>64,901.74</b>	<b>1.00</b>

  

2030 LRDP No Project Total Trip Generation					2030 LRDP Final Total Trip Generation				
Trip Type	Inter	Intra	Total	%	Trip Type	Inter	Intra	Total	%
H-W	2,167.86	5.00	2,172.85	3.70%	H-W	2,246.44	5.20	2,251.64	3.74%
W-H	12,312.51	24.48	12,336.99	20.99%	W-H	12,455.52	24.68	12,480.20	20.73%
H-O	8,136.80	236.68	8,373.48	14.25%	H-O	8,424.87	236.46	8,661.33	14.38%
O-H	8,711.69	220.83	8,932.52	15.20%	O-H	9,037.86	221.82	9,259.68	15.38%
HBC	1,718.81	215.40	1,934.20	<b>3.29%</b>	HBC	1,995.67	236.27	2,231.94	<b>3.71%</b>
NHB	17,322.74	2,989.25	20,311.99	34.56%	NHB	17,519.00	3,098.95	20,617.95	34.24%
X-X	4,711.00		4,711.00	8.02%	X-X	4,711.00	0.00	4,711.00	7.82%
	55,081.40	3,691.63	<b>58,773.03</b>	<b>1.00</b>		56,390.36	3,823.37	<b>60,213.73</b>	<b>1.00</b>

40. The LRDP traffic model must be calibrated to ensure that the structural and land use modifications made to the City's model would not result in the generation of inconsistent or unreasonable traffic forecasts. The results of the calibration effort should be documented and released for public review as part of the DEIR. If such a document exists then the public comment period should be extended.
41. Comparison of LRDP forecasted PM peak hour 2030 roadway volumes to forecasted City General Plan 2030 roadway volumes are shown in the table below. Comparing the LRDP No-Project relative to the City's General Plan analysis, significant PM peak hour volume differences result at key locations within the City. Of most concern, the No Project analysis projects approximately 120-250 more peak hour trips northbound on Storke/Glen Annie. Under the LRDP Final Alternative, forecast PM peak hour trips exceeds the City's General Plan forecasts (GP-1 Forecast – does not reflect regional roadway improvements) – indicating significant impacts at several key locations. Conversely, under the LRDP Final Mitigated Alternative, forecast PM peak hour trips shows significantly less PM peak hour traffic than the City's General Plan (GP-7 Forecast – reflects regional roadway improvements) forecasts. These PM peak hour volume reductions are significant and suggest that the modifications made to the City's model as described above result in significantly less forecasted traffic on key City facilities. Without any information and/or documentation on the LRDP traffic model it appears that the DEIR may be understating the traffic impacts associated with the proposed project.

Roadway Segment		LRDP No-Project vs. City GP-1 Forecast	LRDP Final vs. City GP-1 Forecast	LRDP Mitigated vs. City GP-7 Forecast
Storke s/o Hollister	Northbound	+118	+220	-24
	Southbound	-177	-105	-283
Storke n/o Hollister	Northbound	+251	+307	-133
	Southbound	-134	-76	-364
Los Carneros s/o Hollister	Northbound	+48	+143	+86
	Southbound	-67	+115	-73
Los Carneros n/o Hollister	Northbound	+106	+119	-39
	Southbound	-68	-37	-190
Fairview s/o Hollister	Northbound	-42	-17	-74
	Southbound	+61	+58	-125
Fairview n/o Hollister	Northbound	-41	-42	-290
	Southbound	+39	+15	-495
SR-217	Northbound	-368	-78	-377
	Southbound	-73	+232	+71
HWY 101 Storke - Los Carneros	Northbound	-45	-66	-264
	Southbound	+211	+201	-129
HWY 101 Los Carneros - Fairview	Northbound	-117	-104	-479
	Southbound	+336	+332	-214
HWY 101 Fairview - Patterson	Northbound	+35	+35	-713
	Southbound	+329	+298	-209



42. The DEIR identifies several City intersections where traffic impacts are expected to occur as a result of the LRDP. However there are several key City intersections that are not identified that will likely also be impacted by the proposed project. These include:
- Storke Road/Market Place Dr.
  - Los Carneros/Calle Koral
  - Fairview/Calle Real
  - Patterson/Highway 101 North Bound Ramp
  - Patterson/Highway 101 South Bound Ramp

These intersections should also be analyzed. Current and future traffic volumes and associated levels of service along with mitigation measures as required should be included in the DEIR.

43. Given the significant and unavoidable future traffic impacts associated with the LRDP, the City requests that UCSB consider additional mitigation strategies that have been proven effective at other campuses in California. One such strategy is prohibiting lower level students from having cars on campus. This and other such alternative strategies should be considered in addition to the mitigation measures identified in the DEIR
44. As noted above, the DEIR assumes that enrollment growth will occur in pace with the provision of housing to accommodate the additional students and employees. While this is a worthy goal, there is no stated commitment or guarantee that the planned housing will be constructed. If the enrollment increases outpace the construction of housing, the traffic impact will be greater than shown in the DEIR. The DEIR should either:
- a. Be amended to include a more conservative project alternative that accounts for the potential lag or reduction in the amount of housing constructed; or
  - b. Be revised to include a measurable and binding mitigation measure to limit future increases in students, faculty, and staff commensurate with future amounts of on-campus housing constructed.

Otherwise, population and traffic will be displaced to adjacent communities such as Goleta. The traffic impacts associated with the potential displacement due to a lag or reduction in housing are not analyzed in the DEIR. Periodic traffic surveys to monitor increases of university-related traffic on city streets/intersections should also be required.

45. The DEIR provides for fair share mitigation fee payments to the City of Goleta. While the City supports this concept, the adequacy of payment of proportionate share will depend on accuracy of the LRDP traffic model which assumes all on-campus housing. As noted above the City doesn't believe this is realistic. Mitigation fees need to be adjustable (ie pay initial plus supplemental fees) in event on-campus housing does not keep pace with increases in numbers of additional students, faculty, and staff or in event monitored traffic increases exceed the numbers on which the initial proportionate share calculations are based.
46. 4.13-91. Impact Traffic-1. Preparers of DEIR have tried to simplify by providing language in a single place that could be applicable to all three off-campus jurisdictions. This leaves readers unclear as to which streets/intersections are in each jurisdiction. Residual impacts should only be those where additional mitigation efforts are determined to be infeasible,

i.e. where reasonable planned improvements are insufficient to provide an acceptable level of service. The university should contribute fees to all improvements which are needed in Goleta to reduce impacts, regardless of whether there remains a residual impact. More mitigation efforts are needed to encourage student and faculty/staff commuters to use bus and van-pools. (only 1/3 presently)

47. The DEIR identifies the extension of Phelps Road to Los Carneros Road as a planned improvement and acknowledges future operational deficiencies at Storke/Phelps and Los Carneros/Phelps intersections. No mitigation is identified at these locations and no mention is made of the potential impacts associated with creating this new roadway link. Mitigation measures at the impacted intersections along with an analysis of the potential impacts associated with the extension of Phelps Road to Los Carneros should be included in the DEIR.
48. The City notes that the LRDP includes planned development in close proximity to existing Storke Ranch homes. Adequate vegetated buffers of at least 100-feet should be incorporated to minimize neighborhood compatibility issues. Density, height, noise, light, glare, size, bulk and scale of University development must be addressed.
49. Page 4.13-132. Off-Campus Parking Impacts. The City believes that there is insufficient parking proposed for new faculty/staff housing areas. Spillover of parking into adjacent community areas could occur if unmitigated. Monitoring of parking usage in new family housing areas is needed as part of that mitigation. There should be a requirement to construct supplemental parking if demand exceeds supply. This should be a mandatory mitigation.
50. Page 4.14-1 to -18. Water Supply. The DEIR needs to document and consider the Goleta Water District water assessment report relative to the LRDP.
51. Page 4.14-21. Impact W-2. The increased withdrawal of groundwater from the Goleta Groundwater Basin is a significant impact, since that water supply should be reserved to meet the needs of all users in the event of future prolonged dry periods in which there may be reduced deliveries of state water.
52. Page 4.14-22. Impact W-3. Required mitigations should include University purchase of additional water supply from the State Water Project (over and above the present GWD entitlement) or purchase of state water supply previously committed as entitlements of other entities but not now needed by those entities. Substantial evidence needs to be provided in the DEIR that the various mitigation measures will in fact reduce the residual impact to a level of insignificance.
53. Page 4.15-1 to -6. Wastewater. The University's growth will add considerable flow volumes which could result in significant impacts unless and until the treatment plant is expanded/modified.
54. Pages 4.15-7 to -13. Impact WW-1. The proposed mitigation measure appears to be inconsistent with the statement that wastewater from the project would not exceed the treatment requirements of the Central Coast Regional Water Quality Control Board.

55. Page 4.3-12. Common Species. The last paragraph in section 4.3.1.3 states that Eucalyptus windrows of the north and west campus provide aggregation and roosting habitat for monarch butterflies. The DEIR is inadequate in that it does not fully describe the importance of this habitat, which is part of the Ellwood Monarch Site Complex, and that the autumnal aggregation and roosting sites within the complex are essential to the success of the Ellwood Main site on the City's recently-acquired (at a cost of about \$40 million, inclusive of the value of traded property) Sperling Preserve. The Ellwood site is one of the largest monarch over-wintering sites in the state. The DEIR should further address the scarcity of suitable undisturbed habitats which provide all features necessary to be a successful monarch over-wintering site. The monarch butterfly, although not listed as rare or endangered, is certainly a species of great local importance and of importance to the California Coastal Commission, which is not acknowledged by the DEIR.
56. Page 4.3-40. Impact BIO-3. The mitigations for this impact are inadequate as stated to reduce the residual impact to a level of insignificance. The mitigations appear to allow removal of trees that constitute nesting habitat for raptors and that may in fact have been nesting trees in the past. Only protecting active raptor nests is an insufficient mitigation. In addition, the LRDP apparently allows removal of non-native trees, such as eucalyptus if they are not active nest sites for a special status species, but these trees may be essential elements of the total habitat, providing perching locations for foraging activities by raptors and other birds. The LRDP would allow removal of such trees and windrows even when they provide important habitat for monarch butterflies, since monarchs are not listed as a special status species. Monarchs are, however, considered an important local species and their habitat is considered important for protection by the California Coastal Commission.
57. Pages 4.5-1 to -22. Geology, Soils, and Geotechnical. The DEIR is inadequate in that it does not address the tsunami hazard and the additional population that will be exposed to this geologic hazard, including potential inundation by flood waters and high-velocity wave action. Appropriate mitigation measures may be necessary.
58. Pages 4.6-1 to -24. The DEIR is inadequate in that it does not sufficiently address the discontinuation of the Ellwood Marine Terminal (EMT) by year 2016, as provided in the LRDP, and does not identify the appropriate mitigation measures necessary for decommissioning the facility, clean-up of any contamination by hydrocarbons or other hazardous materials, and restoration of the natural character of the site. The decommissioning plan should also address the off-shore components of the EMT. This is a potentially significant impact which requires as mitigation the preparation of a detailed decommissioning plan by the leaseholder that is acceptable to the University and the County Energy Division and other responsible regulatory agencies. The mitigation measure should state that all costs of decommissioning and restoration are the responsibility of the leaseholder.
59. Page 4.6-33. Impact HAZ-6. The DEIR does not adequately distinguish between impacts related to Venoco's EMT, which is a leaseholder on University Property, and the impacts related to Venoco's Ellwood on-shore processing facility (EOF), which is located in Goleta. Some impacts are associated exclusively with the EOF, while others

are related to the EMT and its associated pipelines and storage tanks. It would be useful to separate these into two individual impact categories. The impacts associated with the discontinuation of the EMT are subject to mitigation. The impacts associated with the risks from additional population near the EOF are not capable of mitigation and are beyond control or management by the University.

60. Page 4.8-22. Impact LU-3. The City notes that its General Plan/Coastal Plan calls for a mitigation agreement to be created and entered into at the time the University amends its LRDP to increase the enrollment cap. The City looks forward to these consultations with UCSB commencing as soon as possible. Any such agreement will need to include provisions for detailed and quantitative monitoring of future changes in enrollment, and numbers of faculty and staff, as well as construction of all types of on-campus housing. Supplemental mitigations must be included in the agreement to address additional impacts that will occur if the construction of on-campus housing does not keep pace with growth in the numbers of students, faculty, and staff. More over, increased demand for public safety services (law enforcement and fire protection) must be adequately addressed in such a mitigation agreement. Traffic mitigations, and perhaps others, may be addressed based on planned and actual increases in the number of students, faculty, and staff, rather than on construction of ASF or GSF. The agreement needs to address other potential impacts that could occur in Goleta, as noted in the various sections of this letter.
61. Page 5.0-4. Project Alternatives. The DEIR needs to address another alternative, which would be based upon provision of a more-likely or realistic amount of new on-campus housing for students, faculty, and staff during the time span of the proposed LRDP. This should be in addition to the current options of the LRDP, which proposes constructing 100% of the needed housing on campus, and the alternative of no additional on-campus housing. Also, the Reduced Enrollment Cap would appear to be the environmentally superior alternative, except for the “no project” alternative. The DEIR needs to provide substantial evidence as to why the Reduced Enrollment Cap Alternative is not selected as the project to adopt and implement or substantial evidence as to why it is not considered to be a feasible alternative.

The City of Goleta appreciates the opportunity to comment on the DEIR and looks forward to receiving the University’s responses to the comments. If you have questions regarding the contents of this letter, please contact Mr. Steve Chase or Mr. Steve Wagner at the City. As the University proceeds with adoption of the LRDP, the City eagerly anticipates cooperative consultations regarding the creation and implementation of appropriate impact mitigation agreements between the two entities.

Sincerely,

Daniel Singer  
City Manager

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