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March 30, 2009

Marc Fisher, AIA, Senior Associate Vice Chancellor
Campus Planning and Design
Facilities Management
c/o Vision 2025
UC, Santa Barbara 93106

Re: Draft Environmental Report
2008 UCSB Long Range Development Plan

Dear Mr. Fisher,

Please accept these comments from COAST - the Coalition for Sustainable Transportation - on the Transportation and Circulation, and Air Quality, sections of the re-circulated draft EIR for the Vision 2025 UCSB Long Range Development Plan (LRDP), for full public review under California Environmental Quality Act (CEQA).

COAST believes that “getting around” should enhance the lifestyle and landscape of our community. That’s why we work to enhance transportation choices in Santa Barbara and along the Central Coast through advocacy, education and outreach. By promoting rail, bus, bike and pedestrian access, we seek options that meet the practical needs of our community while addressing the challenges of climate change and energy dependence.

We see the University of California, Santa Barbara’s proposed Long Range Development Plan as an invaluable opportunity for UCSB to be a leader in transportation planning. While we acknowledge the great benefit of UCSB as a community partner, COAST does not feel that the current recirculated EIR (REIR) is adequate in addressing transportation and we have thus provided specific comment in the hopes of improving the plan.

The REIR is a (generally) reasonable, good faith effort to present (generally) accurate & complete information about anticipated project impacts.

In addition the EIR properly:

- recognizes UCSB as the largest employer, service vendor, and (with nearby Camino Real shopping center) trip generator, on the south coast
- recognizes that current, properly measured levels of service on major local arterial and collector streets, and key state highways, proximate to UCSB (and Isla Vista, student-dominated residential areas), already exceed state, county, and municipal LOS targets

- acknowledges that vehicular traffic to, around, through, the UCSB campus (and related) areas already cause LOS exceedances, and higher than expected vehicular accident levels, even under current conditions.
- identifies Class One adverse, residual impacts to the project area (and the larger community) from existing and new vehicular traffic, which will continue to exist after all suggested mitigations in the draft have been applied

COAST feels that the University has failed to adequately address many of these Class One impacts, which under recent California laws (i.e. AB 32, SB 97, AB 471) would require further analysis and mitigation of all these impacts anyway.

Reasonable and feasible mitigations under CEQA are available to further reduce below the level of significance:

- a) total average daily trips;
- b) peak hour trips;
- c) critical turning movements;
- d) campus (and Isla Vista) parking demand, and
- e) much of the significant adverse air quality impacts.

These more effective mitigation (and offset) strategies for traffic related impacts are already widely used by numerous American institutions of higher educations. They are not adequately analyzed, nor prioritized, by the draft LRDP EIR. This omission constitutes a major failure of the LRDP CEQA review. Therefore, this draft EIR should NOT be certified, in its present form.

Discussion of UCSB’s Proposed Mitigations

It is legally unacceptable under CEQA for a draft EIR which identifies Class One impacts that are not fully mitigated, to use as many un-quantifiable, vague, ambiguous, imprecise words to describe UCSB’s efforts to mitigate its project’s impacts.

The 74 citations of: “could”, “might”, “consider”, “study”, “monitor”, “attempt”, “review”, “share”, “discuss”, “eventually”, “enhance”, “promote”, “work with”, (and similar words) should be clarified before the draft EIR can be certified.

Legally stronger language should include “shall” or “must” for could; “shall” or “will” for might; “commit” for consider; “study and implement” for study, “monitor and effectively enforce” for monitor, “execute” for attempt; “review and execute” for review; “fully fund” for share costs; “negotiate, agree, implement” for discuss, “complete or fully mitigate by (a specific date or gatekeeper mechanism)” for eventually, etc.

The three (3) miscalculations of critical turning movement numbers and impacts should be corrected in the graphic support material; the use of differing numerical values for the same traffic impact, or mitigation effort, should be made congruent.

Specific language suggestions can be found in the following section for each of the traffic mitigations.

LRDP Impact TRAFFIC-1: The proposed UC Santa Barbara LRDP would increase peak hour traffic volumes using City of Goleta intersections resulting in degraded LOS conditions under 2025 Plus Project conditions.

LRDP Mitigation TRAFFIC-1

(1) Enhance and promote existing transportation demand management measures develop new measures to reduce travel by single occupant vehicles to achieve an overall reduction of 10% of trips to and from campus (measured against the anticipated LOS in Tables 4.13-39, 4.13-41, and 4.13-48).

COAST Comments: “Enhance and promote” should read “expand and promote” as the existing systems will need expansion to accommodate the new growth as well as potential unmitigated previous impacts from the University’s 1990 LRDP. The current system should also be “maximized and optimized”. The “anticipated LOS” is a reference to a currently unidentifiable value. In addition, it says, “new and enhanced measures should focus on reducing vehicle travel” where it should read, “shall reduce vehicle travel”. These measures need to be “identified, funded and implemented”.

(2) Within one year following LRDP approval and annually thereafter, monitor traffic conditions on campus and at impacted nearby City and County intersections and roadways. Monitoring will include the intersections and roadways analyzed in the traffic modeling effort for this EIR, specifically those set forth in Tables 4.13-39, 4.13-41 & 4.13-48.

COAST Comments: This does not identify who will be performing the monitoring nor who will provide the funding for monitoring. Additionally, identifying what will be evaluated is essential (i.e. ADT, peak hour only, accidents, etc.). Also, when impacted intersections have been identified, it should not follow that “roadway improvements such as widening or traffic signal timing” are the only measures considered. Measures intended to reduce demand for SOV use should also be considered as solutions to potentially impacted intersections.

(3) Work with the Cities, County, SBCAG, and SBMTD and other transit providers to determine appropriate transportation improvements, for providing mitigating offsets to increased traffic (e.g. transit stops, bicycle paths, transit subsidies).

COAST Comments: The clause “work with...” is vague and only indicates process and does not commit to any end results. The University should “identify, fund, and implement mitigation strategies”.

(4) Contribute to the City of Goleta and County of Santa Barbara the University’s proportionate share of mitigating significant impacts to intersections and roadways identified in Tables 4.13-39, 4.13-41 & 4.13-48 due to 2008 LRDP traffic increases.

Contributions made by the University that exceed its proportionate share of the cost of mitigating a particular impact or that mitigates more than its impact may be credited towards mitigation by the University of future impacts. The University’s payment will be made available to the jurisdiction no later than the start of construction or when implementation of the improvement is reasonably certain.

COAST Comments: Contributing to the City of Goleta and County of Santa Barbara is essential but with impacts to Highways 101 and 217, the UCSB should also be contributing its mitigation share to Caltrans. While we agree that one aspect of determining the University’s proportionate share incorporates “the percentage of traffic attributable to UC Santa Barbara”, it is not clear whether this will include previously unmitigated impacts from the 1990 LRDP. Many of the intersections and arterials referred to in the document are exceeding acceptable LOS due to previous impacts from the University and so should be included in determining the current proportionate share.

Payment of in lieu traffic mitigation fees to other government agencies to mitigate identified transportation-circulation-air quality impacts should not allow UCSB to expand within the LRDP until after fee-funded projects were completed.

LRDP Impact TRAFFIC-2: The proposed UC Santa Barbara LRDP would increase peak hour traffic volumes using Santa Barbara County intersections resulting in degraded LOS conditions under 2025 Plus Project conditions.

LRDP Mitigation TRAFFIC-2A:

(1) Enhance and promote existing transportation demand management measures and develop new measures to reduce travel by single occupant vehicles to achieve an overall reduction of 10% of trips to and from campus (measured against the anticipated LOS in Tables 4.13-39, 4.13-41 & 4.13-48).

COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A.

(2) Within one year following LRDP approval and annually thereafter, monitor traffic conditions on campus and at impacted nearby City and County intersections and roadways. Monitoring will include the intersections and roadways analyzed in the traffic modeling effort for this EIR, specifically those set forth in Tables 4.13-39, 4.13-41 & 4.13-48.

COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A

(3) Work with the Cites, County, SBCAG, and SBMTD and other transit providers to determine appropriate transportation improvements, for providing mitigating offsets to increased traffic (e.g. transit stops, bicycle paths, transit subsidies).

COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A

(4) Contribute to the City of Goleta and County of Santa Barbara the University's proportionate share of mitigating significant impacts to intersections and roadways identified in Tables 4.13-39, 4.13-41 & 4.13-48 due to 2008 LRDP traffic increases. Contributions made by the University that exceed its proportionate share of the cost of mitigating a particular impact or that mitigates more than its impact will be credited towards mitigation by the University of future impacts. The University's payment will be made available to the jurisdiction no later than the start of construction or when implementation of the improvement is reasonably certain.

COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A

LRDP Impact TRAFFIC-3: The proposed UC Santa Barbara 2008 LRDP (with and without the proposed roadway improvements) would increase peak hour traffic volumes on campus resulting in increased congestion during peak travel hours.

LRDP Mitigation TRAFFIC-3A:

UC Santa Barbara shall provide a balanced transportation system on campus, offering vehicular, bicycle, pedestrian, and transit mobility. UC Santa Barbara shall consider intersection and roadway improvements as individual projects are constructed that require additional roadway capacity. Roadway improvements shall not conflict with existing or planned pedestrian and bicycle facilities or degrade mobility for pedestrians and bicyclists traveling on campus. Improvements shall be implemented as necessary to maintain campus roadways at a LOS no worse than as shown on Table 4.13-44.

COAST Comments: It is unclear how the University plans to provide a "balanced transportation system". There are no specific plans identified as to the mitigations that "shall" be provided. Intersections that are already operating at suboptimal LOS are likely due to previously unmitigated impacts from the University and should be addressed before the proposed LRDP is implemented. The University indicates that "improvements shall be identified", which is vague,

and does not indicate any commitment to implementing or funding those improvements which is necessary. To say that roadway improvements “shall not conflict with existing...facilities” is a confusing claim, especially considering the plan to remove currently high-functioning bicycle routes such as the Pardall Tunnel.

LRDP Impact TRAFFIC-4: The proposed UC Santa Barbara LRDP would increase daily traffic volumes using City of Goleta roadways resulting in degraded LOS conditions under 2025 Plus Project conditions.

LRDP Mitigation TRAFFIC-4A

(1) Enhance and promote existing transportation demand management measures and develop new measures to reduce travel by single occupant vehicles to achieve an overall reduction of 10% of trips to and from campus (measured against the anticipated LOS in Tables 4.13-39, 4.13-41 & 4.13-48).

COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A

(2) Within one year of LRDP approval and annual thereafter, monitor traffic conditions on campus and at impacted nearby City and County intersections and roadways. Monitoring will include the intersections and roadways analyzed in the traffic modeling effort for this EIR, specifically those set forth in Table 4.13-39, 4.13-41 & 4.13-48.

COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A

(3) Work with the Cites, County, SBCAG, and SBMTD and other transit providers to determine appropriate transportation improvements, for providing mitigating offsets to increased traffic (e.g. transit stops, bicycle paths, transit subsidies).

COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A

(4) Contribute to the City of Goleta and County of Santa Barbara the University’s proportionate share of mitigating significant impacts to intersections and roadways identified in Tables 4.13-39, 4.13-41 & 4.13-48 due to 2008 LRDP traffic increases. Contributions made by the University that exceed its proportionate share of the cost of mitigating a particular impact or that mitigates more than its impact will be credited towards mitigation by the University of future impacts. The University’s payment will be made available to the jurisdiction no later than the start of construction or when implementation of the improvement is reasonably certain.

COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A

LRDP Impact TRAFFIC-5: The proposed UC Santa Barbara LRDP would increase daily traffic volumes using Santa Barbara County roadways resulting in degraded LOS conditions under 2025 Plus Project conditions

LRDP Mitigation TRAFFIC-5A:

(1) Enhance and promote existing transportation demand management measures and develop new measures to reduce travel by single occupant vehicles to achieve an overall reduction of 10% of trips to and from campus (measured against the anticipated LOS in Tables 4.13-39, 4.13-41 & 4.13-48).

COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A

(2) Within one year of LRDP approval and annually thereafter, monitor traffic conditions on campus and at impacted nearby City and County intersections and roadways.

Monitoring will include the intersections and roadways analyzed in the traffic modeling effort for this EIR, specifically those set forth in Table 4.13-39, 4.13-41 & 4.13-48.

COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A

(3) Work with the Cities, County, SBCAG, and SBMTD and other transit providers to determine appropriate transportation improvements, for providing mitigating offsets to increased traffic (e.g. transit stops, bicycle paths, transit subsidies).

COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A

(4) Contribute to the City of Goleta and County of Santa Barbara the University's proportionate share of mitigating significant impacts to intersections and roadways identified in Tables 4.13-39, 4.13-41 & 4.13-48 due to 2008 LRDP traffic increases. Contributions made by the University that exceed its proportionate share of the cost of mitigating a particular impact or that mitigates more than its impact will be credited towards mitigation by the University of future impacts. The University's payment will be made available to the jurisdiction no later than the start of construction or when implementation of the improvement is reasonably certain.

COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A

LRDP Impact TRAFFIC-6: The proposed UC Santa Barbara LRDP would increase peak hour traffic volumes on Caltrans freeway facilities resulting in degraded LOS conditions under 2025 Plus Project conditions.

LRDP Mitigation TRAFFIC-6A:

(1) Enhance and promote existing transportation demand management measures and develop new measures to reduce travel by single occupant vehicles to achieve an overall reduction of 10% of trips to and from campus (measured against the anticipated LOS in Tables 4.13-39, 4.13-41, 4.13-48 & 4.13-50).

COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A

(2) Within one year of LRDP approval and annually thereafter, monitor traffic conditions on campus and at impacted nearby City and County intersections and roadways. Monitoring will include the intersections and roadways analyzed in the traffic modeling effort for this EIR, specifically those set forth in Tables 4.13-39, 4.13-41 & 4.13-48.

COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A

(3) Work with the Cities, County, SBCAG, Caltrans, and SBMTD and other transit providers to determine appropriate transportation improvements, for providing mitigating offsets to increased traffic (e.g. transit stops, bicycle paths, transit subsidies).

COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A

(4) Contribute to the City of Goleta, County of Santa Barbara and Caltrans the University's proportionate share of mitigating significant impacts to intersections and roadways identified in Tables 4.13-39, 4.13-41, 4.13-48 & 4.13-50 due to 2008 LRDP traffic increases. Contributions made by the University that exceed its proportionate share of the cost of mitigating a particular impact or that mitigates more than its impact will be credited towards mitigation by the University of future impacts. The University's payment will be made available to the jurisdiction no later than the start of construction or when implementation of the improvement is reasonably certain.

COAST Comments: Please see Comments from LRDP Mitigation TRAFFIC 1-A

LRDP Impact TRAFFIC-7: The proposed UC Santa Barbara LRDP would increase bicycle and pedestrian travel on campus and modify existing bicycle facilities, which could increase bicycle and pedestrian congestion

LRDP Mitigation TRAFFIC-7A:

UC Santa Barbara shall implement the proposed bicycle improvements identified in the LRDP, continue to provide an extensive bicycle and pedestrian network on campus, and monitor conflicts between the various modes of travel on campus.

COAST Comments: Pedestrian and Bicycle LOS should be considered and evaluated for the current LRDP. Because 49% of students bike and 21% walk to campus, the impacts to these travel modes should be considered thoroughly when evaluating intersections.

The LRDP mentions pedestrian and bicyclist impacts on vehicles but more consideration should be given to the impact of vehicles on pedestrians and bicyclists as main travel modes. The University seeks to remove the high functioning bicycle route known as the Pardall Tunnel even noting that, “the elimination of the tunnel would result in a less attractive route for bicyclists”. The Tunnel should be maintained and the additional proposed connections through Ocean Road should be implemented. The University should identify specifically how it plans to create the seven connections through Isla Vista as this is a main corridor for students, staff and faculty traveling to and from campus.

The elimination of the Pardall Tunnel inconveniences bicyclists in an attempt to improve vehicle circulation at the expense of bicyclist and pedestrian safety. The University has stated that it is working towards a balanced transportation system but actions such as this are contrary to those claims when vehicles are prioritized.

LRDP Impact TRAFFIC-8: The proposed UC Santa Barbara LRDP would increase transit ridership in the vicinity of campus.

LRDP Mitigation TRAFFIC-8A:

UC Santa Barbara shall work with the Santa Barbara Metropolitan Transit District in conjunction with the City of Goleta and Santa Barbara County to determine the appropriate transportation improvements, such as roadway widening, improved bicycle and pedestrian facilities, or enhanced transit service, to accommodate campus growth proposed under the LRDP.

COAST Comment: As in previous mitigations, “shall work” only indicates process and does not identify outcomes. Transit is a key element to a balanced transportation system. Furthermore, impacts to the transit system cannot simply be absorbed by SBMTD and UCSB should be responsible for mitigating these affects by providing increased funding to SBMTD, or providing its own system of shuttles and/or vans for students, staff and faculty. It is important to consider not just travel to and from campus but also the need for students, faculty and staff living in campus housing (and presumably not owning a vehicle) to travel to services such as the Calle Real Marketplace. The indirect growth effects, which are inadequately addressed in the REIR will also have an impact on service as more people working in the service industry and family members will be traveling to and from campus

LRDP Impact TRAFFIC-9: The proposed 2008 LRDP would increase parking demands on campus primarily for new student, faculty, and staff residents.

LRDP Mitigation TRAFFIC-9A: UC Santa Barbara shall provide residential parking on campus as proposed in the LRDP and continue to conduct yearly parking surveys to monitor parking utilization rates for on-campus parking lots.

COAST Comments: Without more detailed and enforceable mitigations, there will not be sufficient on campus parking. Reducing the amount of available parking is only one part of a

suite of ways to decrease SOV use in and around campus.

Also, this does not indicate the purpose of conducting parking surveys or what actions will be taken based on the results of surveys.

LRDP Impact TRAFFIC-10: The proposed UC Santa Barbara LRDP would increase parking demands in Isla Vista.

LRDP Mitigation TRAFFIC-10A:

UC Santa Barbara shall contribute its fair-share towards the implementation of a parking permit program in Isla Vista.

COAST Comments: An Isla Vista resident parking permit program should be considered again. The increased potential for increased parking demand in Isla Vista as the University does not plan to significantly increase the number of parking spaces on campus and the spillover is likely to increase.

Additionally, Table 4.2-16 (Page 4.2-47) suggests, in SP-7: Transportation, that UCSB “develop transportation strategies that ... while providing opportunities for alternative transportation...”. The section does not indicate that developed ... strategies will ever be implemented successfully, or when. The section similarly does not indicate prioritizing those “opportunities” for alternative transportation, let alone a timeline for success.

Additional Proposed Mitigations

All Class One transportation and circulation impacts, and most air quality impacts, could be reduced to levels of insignificance under CEQA if UCSB agreed to execute proposed LRDP capital, personnel, and enrollment expansion without addition of any new vehicular trips to the campus area, or the south coast Santa Barbara region, within the life of the new LRDP. The cost, tools, and capital improvements needed for these reductions would be less than the projected cost, time delay, and environmental impacts of the vehicle-centric capital improvements proposed in the draft EIR to (unsuccessfully) mitigate traffic impacts by physically accommodating and encouraging them.

A more aggressive Transportation Demand Management option, to reduce total UCSB traffic by 1.5% for every 1% of LRDP growth, could also allow the University to reduce its transportation-circulation-air quality Class One impacts below the level of legal CEQA significance. Such reductions must be concurrent to, or preceding, expansion phases under the LRDP, to be legally valid. In a modified cap and trade program, the University could choose from a variety of potential mitigation measures to create a suite of options to meet their targets.

Some of the proposed mitigations could include:

- a) Phasing in, over a four-year period, a total UCSB ban on undergraduate students bringing cars with them. Exceptions to be made on a case-by-case basis relating to A.D.A., or work-related, “special needs”;
- b) Resident permit parking programs for Isla Vista, Phelps Road, residential areas immediately west of Storke Road. Exceptions to be made for visitor daytime parking in Isla Vista within two blocks of the ocean, beginning five blocks west of UCSB’s Ocean Road east campus;
- c) Stringent memoranda of understanding (MOUs) with: the CA Dept. of Motor Vehicles, the CA Highway Patrol, the SB County Sheriff’s Foot Patrol, Sheriff’s office, and Transportation divisions for active enforcement; of the Resident Permit Parking, Coastal Access Visitor Parking, student vehicle ban;

- d) More stringent enforcement of UCSB-related parking at the southerly end of Goleta Beach County Park;
- e) Expansion of Traffic Solutions ride-share, carpool, car share, vanpool programs on campus, and in Isla Vista to include cars at on campus housing nodes;
- f) Expansion of the Vista and Clean Air Express freeway commuter express service with a negotiated group-rate for UCSB students, faculty, staff;
- g) Expansion of SB MTD regularly scheduled service connecting UCSB and Isla Vista with the surrounding community;
- h) Extension and expansion of existing UCSB-SB MTD pass programs to continue coverage of all students and extend benefits to faculty and staff;
- i) Expansion of UCSB's existing shuttle fleet to provide more trips now left to single occupant vehicle drivers to include connectivity to Camino Real Marketplace and the Goleta Train Station;
- j) Aggressive expansion of staggered work hours and flex-time working conditions and tele-commuting, where congruent with job descriptions;
- k) Modification of classroom schedules and standardized staff work-hours to make them more amenable to the above alternative travel modes;
- l) "Developer fees," based on the Institute of Transportation Engineering (ITE) Manual trip-generation factors, for each new UCSB capital expansion within the LRDP; fees to be pooled to help fund the traffic mitigation and offset programs (Stanford University can be used as successful example);
- m) Reduce planned new campus parking structures by 50% below levels now listed in the LRDP, to dissuade future single occupant vehicle trips to/on campus;
- n) Budget a fee for existing parking lots, to help fund non-vehicle alternatives;
- o) Offer "incentive bonuses" within future negotiated UCSB workforce labor contracts to reward all faculty and staff who shift work trips to campus away from single occupant vehicle trips;
- p) Negotiate memoranda of understanding with the Santa Barbara County Association of Governments, the CA Transportation Commission, the CA Air Resources Board, the CA Energy Commission, and the U.S. Dept. of Transportation to expand, prioritize, and incentivize all UCSB LRDP programs which seek to reduce current, and future predicted, motor vehicle use, to help fund all such projects and programs, and their proper staffing.
- q) More close-in or on-campus student, faculty, staff new housing, to make trips to/from work or classrooms more amenable to walking, biking, or bus.
- r) Increased commercial and retail use in and around campus housing to decrease trip generation

Conclusion

While the re-circulated LRDP EIR's transportation, circulation, and air quality sections contain many charts and much discussion of future impacts, not enough space or ingenuity is devoted to aggressive, real-world efforts to fully mitigate the (properly) identified Class One impacts, as required by CEQA.

The University has dismissed the idea of a reduced enrollment alternative and has failed to seriously consider any viable alternatives. Therefore, this draft EIR should NOT be certified, in its present form.

Universities from Cal-Berkeley to Stanford to UCLA to CalTech to UC Davis here in California all effectively employ trip reduction and mitigation strategies far more innovative than those found in the LRDP EIR.

Successful "urban" research universities like Columbia, Harvard, MIT, University of Chicago, Georgetown, Johns Hopkins, Colorado-Boulder, University of Virginia all similarly feature more effective disincentives to personal motor vehicles on or near their campuses, and more creative funding mechanisms to assist their students, faculty, and staff to fully participate in campus and community activities without extensive single occupant vehicle use.

The Coalition for Sustainable Transportation (COAST) reluctantly concludes that the draft EIR's sections on transportation, circulation, air quality still do not meet the full intent of the CA Environmental Quality Act's high standard for identifying and mitigating to the greatest reasonable and feasible extent possible adverse, Class One impacts.

COAST is willing and eager to work with UCSB to help them meet the state standard, so that the LRDP can be adopted as quickly as possible, consistent with a full suite of successful impact mitigation strategies.

Respectfully,

A handwritten signature in black ink, appearing to read "Eva Inbar". The signature is fluid and cursive, written in a professional style.

Eva Inbar, COAST President