



# Community Environmental Council

March 30, 2009

Mr. Tye Simpson  
Director of Campus Planning and Design  
University of California, Santa Barbara  
Office of Campus Planning & Design  
c/o Vision2025  
Santa Barbara, CA 93106-1030

Dear Mr. Simpson,

The Community Environmental Council is a local environmental non-profit organization founded in 1970 and based in the City of Santa Barbara. Our flagship campaign is to wean the Tri-Counties region off fossil fuels by 2033 or sooner, effectively eliminating greenhouse gas emissions on a net basis. More information on our programs can be found at [www.fossilfreeby33.org](http://www.fossilfreeby33.org). We thank the University for the opportunity to comment on the recirculated Draft Environmental Impact Report for the Long Range Development Plan and look forward to working with staff in the coming months to complete a comprehensive plan.

The University is a major cultural and employment asset in Santa Barbara County. The LRDP proposes some innovative strategies to allow our community to grow in a more sustainable manner, and could be a model for new development. While we applaud the efforts toward energy efficiency, renewable energy, and transportation demand management, we are disturbed by the significance findings regarding greenhouse gas (GHG) emissions. In particular, the DEIR does not include an adequate baseline for GHG emissions, nor an adequate assessment of the GHG emissions from the proposed new buildings. Furthermore, the DEIR uses the proposed projects within the LRDP to estimate "business as usual" for a threshold of significance, when the baseline should be the emissions resulting from current operations.

CEC also supports the University's plan to house all of the projected growth in students and staff on or near campus. By enabling this population to live close to school and work, many vehicle commute trips will be eliminated, allowing for more sustainable living patterns and less impacts on the surrounding roads and community. However, as the models predict, there will still be a significant amount of new trips generated, particularly by family of staff and off campus trips by students and staff. Thus, there will be deterioration in level of service (LOS) for many surrounding intersections. While we support the mitigation proposed in the DEIR we feel that these measures are too vague and need to be further explained to reduce the impacts levels to less than significant.

A more detailed discussion of our concerns is below:

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### Other State-Regulated Pollutants (pg. 4.2-5)

Under Other State-Regulated Pollutants (pg. 4.2-5) there is an inaccurate reference for “Section 6.3, Global Climate Change.” This reference should be changed to reflect the current Climate Change Section: 4.2.3.

### Climate Change (Section 4.2.3)

We support the University’s Campus Sustainability Plan (CSP), and the UCOP Policies on Sustainable Practices. In particular, we are excited by the requirements for new buildings, efficiency upgrades, renewable energy, and transportation. We also support the University’s goals to meet CARB’s Preliminary Draft GHG Significance Thresholds (pg. 4.2-54 through 4.2-55).

While the University has taken an important first step to understanding their carbon footprint, the 2007 emission calculation is seriously lacking because it does not include private vehicle trips (pg. 4.2-57). Though the DEIR states that the University will conduct an inventory that includes GHG emissions from “fleets, commuting and business air travel” (pg. 4.2-15), the current “baseline” is insufficient because these emissions are not included. Additionally, the emissions attributed to the transportation section of the LRDP should be included in this section (currently we are referred to Section 4.13) to facilitate a comprehensive discussion of GHG emissions.

In addition, the estimated GHG emissions from the LRDP off campus electricity and natural gas use seem to be incomplete. The emissions from the additional 5,443 student bed spaces, 239 student family units, and 1,874 faculty and staff housing (pg. 4.10-26), must be accounted for to adequately assess the future GHG emissions from the LRDP. The 7,000 bed spaces and residential units will more than double the existing bed spaces and units from 2007. This increase brings about two questions regarding the completeness of Table 4.2-20 LRDP GHG Emissions (pg. 4.2-59) and Table 4.2021 LRDP GHG Emissions with Housing and Scoping Plan Measures (pg. 4.2-60).

- 1). Given this increase, how is it that the emission levels of the LRDP do not change for off-campus electricity and natural gas use depending on the inclusion of housing in the LRDP?
- 2). Given the more than doubling of the housing stock, how will the emissions from off-campus electricity and natural gas decrease by approximately 30 percent?

A more in-depth analysis of current and future building energy use on campus and off-campus must be included for the DEIR to be deemed complete. The analysis should also be applied to vehicle trips due to the fact that there is no existing baseline for vehicle trips making the estimated reduction invalid.

### GHG Significance Determination (pg. 4.2-61)

Under CEQA, the baseline from which to evaluate project impacts is typically “the physical environmental conditions in the vicinity of the project, as they exist at the



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time the notice of preparation is published.” Guidelines § 15125(a). Thus, any baseline to measure significance should be an inventory of current operations – which represents the “business as usual” estimation; meaning that *any additional* emissions over current levels must be considered significant. Therefore, the finding of no significance is invalid. AB 32 requires statewide emissions of GHG to return to 1990 levels by the year 2020, this equates to a reduction in emissions of 30 percent over business as usual.

The LRDP does *not* represent business as usual. Business as usual is the continuation of existing student, staff, and faculty levels, with no new projects. The LRDP is a new project (hence the need for an EIR) and therefore *any* emissions resulting from the LRDP must be assessed against the existing baseline GHG emissions.

While there is no official emission threshold yet, several state agencies have decided that a zero emission threshold is required to meet the requirements of AB 32 (including California State Lands Commission<sup>1</sup>). This means that any additional emissions, over and above the baseline – current operations – would be considered significant and must be mitigated to the greatest extent possible.

### GHG Emission Mitigation

Energy efficiency and conservation are generally the most cost-effective means to reduce GHG emissions. Many of the plans for building retrofits and renewable energy may be able to be counted as mitigation for the increased GHG emissions from LRDP projects. Due to the inadequate baseline and future GHG emission estimates, we cannot, at this time, quantify the benefits of any specific mitigation measures.

If any GHG emissions are not able to be mitigated through improvements to the campus, GHG emission offsets may be purchased provided that all offsets are verifiable through an unbiased, legitimate third party, like the California Climate Action Registry. The two most important characteristics of GHG emission offsets are validity and additionality. Verification through a third party ensures that emission offset projects have actually occurred and have offset the claimed emission amounts. Additionality can be more difficult to assess, but is equally important. Additionality means that any offsets need to provide for an opportunity or project that would not otherwise have occurred. Only when both these criteria are met, can an action be considered an offset.

### Transportation and Circulation

CEC applauds the University for their plan to house all of the projected growth in students and staff on or near campus, which will help mitigate some of the congestion impacts from the LRDP. However, there will be deterioration in level of service (LOS) for many surrounding intersections in the City of Goleta, County of Santa Barbara, on campus, and on CalTrans freeways, resulting in the six significant impacts as designated

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<sup>1</sup> California State Lands Commission, Recirculated DEIR, Venoco Ellwood Marine Terminal Lease Renewal Project, CSLC EIR #743. 2008



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(TRAFFIC-1 to TRAFFIC-6). Some of these impacts are significant, even with the mitigations that the University plans.

The DEIR proposes to mitigate the significant impacts by paying a proportionate share for roadway improvements in surrounding impacted areas, monitoring traffic conditions at impacted intersections, and working with stakeholders to determine appropriate alternative transportation improvements to mitigate traffic. The focus of our transportation comments are on the LRDP Mitigations TRAFFIC-1A through Traffic-6A (pg. 4.13-119 through pg. 4.13-153). The mitigations include vague goals to enhance and promote existing transportation demand measures, and develop new measures to achieve an overall reduction of 10 percent of trips to and from campus. This mitigation will not reduce congestion impacts below to less than significance.

### Mitigation Measures TRAFFIC-1A through TRAFFIC-6A (pg. 4.13-119 through pg. 4.13-153)

In order to fully mitigate the transportation impacts, CEC would like the University to consider mitigation measures that would result in a greater than 10 percent reduction of trips to and from campus. The University has an opportunity to build a model community from the ground up. With aggressive transportation demand measures, as well as new transit and alternative mode programs, the University should target a 20 percent or 30 percent reduction in trips. This would more substantially alleviate congestion concerns, as well as help the University reach greenhouse gas emission reduction goals from commuting. CEC has many ideas on how these goals could be reached, and is willing to work with the University to share success stories from other organizations and to pilot and develop appropriate programs.

In particular, the following traffic mitigation measures should be added to TRAFFIC-1A through TRAFFIC-6A (pg. 4.13-119 through pg. 4.13-153):

- Increased funding for the Transportation Alternatives Program. This successful program encourages and incentivizes staff and students to use alternative transportation. Many innovative and successful programs have come out of TAP. It currently is staffed at 1.5 full time employees, but has a diminishing revenue stream and over the past few years has received less and less funding. With more resources and/or increased staff, TAP could be an instrumental part in reducing trips to and from campus.
- Individualized marketing of specific modes of alternative transportation. The University has taken many steps to encourage alternative transportation at the campus, but could additionally adopt additional commuter benefits strategies utilized by other large employers like Cottage Hospital and the City and County of Santa Barbara. Examples include monthly stipends or additional vacation time for employees who take alternative transportation more than 80 percent of the time, or a no interest loan for a commuting bicycle. These programs could also



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help reduce the new parking needed at the University, which at \$17,000 to \$35,000 per space for structured parking, is very expensive.

- Increase ridesharing and vanpools to campus. While many staff, faculty and students utilize ridesharing and vanpooling, more could be done to encourage ridesharing and vanpools through synergistic efforts with many of the other strategies proposed in this letter, for example, the monetary incentives above could be combined with reduced cost parking permits for ridesharing.
- Integrate car-sharing into the new development, as well as into existing employee and student housing. Parking is a major issue and cost on campus and in Isla Vista. As employee housing will allow employees to walk or bike to work, many of these families could become one car (or no car) instead of two car households. The University should expand the current Zipcar car-sharing agreement to provide a fleet of vehicles for employees and students. A certain number of free hours could be included in monthly rent, and parking spaces could be sold or rented separately from the development to encourage utilization of car-sharing. Studies show that car-sharing members drive less and use alternative transportation more.
- Increased commercial activity in the proposed development and in Isla Vista. Currently, the sizeable population of Isla Vista and the University must travel to Goleta or Santa Barbara for necessities such as a full service grocery store, etc. Isla Vista developments and mixed use new commercial development could incorporate additional community needs (grocery store, corner and convenience stores, restaurants, drycleaners, etc.) so that more of the population's needs are met within an area that can be reached by bike, foot, or bus.
- Shuttle to Camino Real Marketplace and other frequented destinations. While an electric MTD shuttle may soon be started and funded for 3 years, this program should be expanded for the life of this project to make it easy for students to access this shopping district without generating more car trips. New shuttles should also go campus wide to connect new staff housing with offices and make it easier to get around campus without a car. These shuttles should utilize alternative fuels such as electricity or biodiesel.
- Encourage telecommuting and flexwork (working 4/40 or 9/80 schedules). UCSB went through an extensive demonstration process with SBCAG's Traffic Solutions to develop telecommuting and flextime policies. However, it is now up to department heads to promote the programs and there has not been a large adoption of telecommuting and flexwork. The University should make policies that set targets depending on how applicable each strategy is for various departments, and promote these targets. If all the groundskeepers went to a 4/40 workweek or administrative staff telecommuted one day per week, or even one day per month, significant trips could be averted. As many staff live in North County or Ventura, this option could also save significant amounts of fossil fuels.



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- New parking limitations. While the current parking system has helped UCSB have a high adoption of alternative modes, more could be done to discourage students and staff from commuting in single occupancy vehicles. Parking fees could be raised, carpool permits could be free instead of half price, etc. As new structured parking can cost from \$17,000 to \$35,000 per space, it is only fair to reward those that chose alternative transportation and charge those that drive alone the full cost of providing parking.
- Free, unlimited bus passes. While students already receive bus passes, this program could be expanded to staff and faculty.
- One way to fund these programs is through a building tax, as is done at Stanford University through their Stanford Infrastructure Program. This money could then fund parking and alternative transportation programs to decrease impacts on surrounding communities.

### Mitigation TRAFFIC-7A, pg 4.13-159

Bikes are one of the most used modes of transportation on campus, with 50 percent of students and 9 percent of faculty and staff community by bike. The LRDP will significantly affect biking and walking on campus as indicated in impact TRAFFIC-7 (pg. 4.13-159). Mitigation, the University proposed to implement various biking and walking projects (LRDP Mitigation TRAFFIC-7A, pg 4.13-159). In addition to these mitigations, the following community projects could be considered to build-out relevant parts of Santa Barbara County's bicycle infrastructure and make it easier for students, staff, and faculty living in adjacent areas to safely access the University and nearby shopping.

- A short Class 1 bike path through Girsh Park to Camino Real Marketplace. Currently, bicyclists have to travel alongside heavy motor traffic on Storke Road to access Camino Real Marketplace. This new bike path would make it easier and safer for bicyclists to access this shopping district.
- A Class 1 bike path along San Jose Creek, connecting with the Coast Route. This would allow bicyclists West of Highway 217 a safe and easy way to access the Coast Route. Many students/staff/faculty could benefit from this path. The City of Goleta has funding for some planning work regarding this route, and the University could work with the City of Goleta to develop and fund this path.

### TRAFFIC-8 pg. 4.13-161

The DEIR states that the impact of the LRDP on transit ridership TRAFFIC-8 (pg. 4.13-161) will be "less than significant." Due to the current demand on the MTD lines and the potential increase in demand to those lines, the impact level should be increased to "significant." Currently six MTD lines serve UCSB, approximately one quarter of



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MTD routes. As transit services only recover a portion of revenue from the farebox, it is unlikely MTD will be able to expand service sufficiently to serve the new population. As is, these lines are some of the most crowded on the system, with boarding denials required at times because of overcrowding. Therefore, it is likely that these routes will become overcrowded as University population grows, affecting both University riders and other community members and resulting in overcrowding and boarding denials – a significant impact.

### Mitigation TRAFFIC-8A (pg. 4.13-161)

Due to the resulting significant impact to transit ridership, mitigation measure TRAFFIC-8a is inadequate. The University should work with MTD and long distance commuter bus providers to provide an appropriate payment for capital costs, as well as continued payments to assist annual operating budgets.

### Conclusion

In order to be deemed complete and valid, the Final EIR must:

- Conduct an adequate baseline study of existing GHG emissions
- Analyze additional GHG emissions resulting from additional VMT and new construction
- Fully mitigate any GHG emissions over existing levels through activities like energy efficiency upgrades to existing buildings, investments in renewable energy, or transitioning to a full electric fleet.
- Agree to specific mitigation measures and numeric goals that will ensure a decrease single occupancy vehicle commuter and trips to and from campus.
- Increase mitigation measures for impacts to bicycle and transit commuters.

We thank the University for the opportunity to comment on the LRDP and look forward to working with Staff in preparation of the Final EIR.

Sincerely,

Handwritten signature of Megan Birney in black ink.

Megan Birney,  
Senior Energy Associate,

Handwritten signature of Michael Chiacos in black ink.

Michael Chiacos,  
Senior Energy Associate,

Handwritten signature of Dave Davis in black ink.

Dave Davis,  
Executive Director