

Santa Barbara Audubon Society, Inc.
A Chapter of the National Audubon Society



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RE: Recirculated dEIR Comments LRDP 2008

Santa Barbara Audubon submitted comments on the draft EIR June 23, 2008, and now submit comments on the recirculated sections of the draft EIR. We want to be sure that our comments from the first round are addressed in the final EIR, as well response to these comments.

The University is a partner in the community, and we wish to see a cooperative effort for sustainable development. Audubon values the contribution of UCSB, and hopes that with community input a stronger University can emerge consistent with constraints such as water, transportation and energy. We appreciate the plan to house the increase in students and faculty as proposed in the LRDP 2008.

POPULATION AND HOUSING

Lag time enrollment increases & new housing construction.

The recirculated dEIR appears to contain a commitment to provide housing for the enrollment increases within four years, for each incremental increase. That is insufficient, and Audubon requests the commitment to provide new housing *before* added enrollment. We understand that student housing is often in multiples of 400. If that is the case, then build housing for 400 students, then 400 new students can be added to the enrollment, up the maximum that is approved by full build-out of the LRDP. The dEIR is flawed and fails to mitigate for the added population without this provision.

Reduced enrollment alternative.

The dEIR contains an alternative with 3000 students rather than 5000. While the tables show the areas of same or reduced impact compared to the preferred plan, this alternative should be thoroughly evaluated to see if impacts to water, transportation and energy resources can be adequately mitigated at this level of development. The concomitant reductions in faculty, staff, and academic space need to be delineated and impacts evaluated, to see if this level of development can be managed sustainably.

Housing Imbalance.

Note that the current imbalance in housing supply (POP-2) would not be improved if the new housing were reduced proportionate to the reduced student cap. Analysis of new housing in excess of expansion of students, faculty and staff could be evaluated, and see how this might lessen transportation impacts as well.

AIR QUALITY

4.2.2-3 2008 LRDP Impacts and Mitigation Measures

LRDP Impact AIR-1: *Campus growth under the 2008 LRDP would result in daily operational emissions above significance thresholds; therefore, the proposed project may contribute to a violation of air quality standards or hinder attainment of the 2007 Clean Air Plan. **Significance:** Significant.*

LRDP Mitigation AIR-1A: *Vehicular Sources. UC Santa Barbara shall implement LRDP Mitigation TRAFFIC-1, TRAFFIC-2, TRAFFIC-4, TRAFFIC-5, TRAFFIC-6 to reduce motor vehicle trips by enhancing bicycle, pedestrian, and transit facilities and services.*

LRDP Mitigation AIR-1B: *Area. Sources. The LRDP shall support the full implementation of UC Santa Barbara's Sustainability Plan and the green building policy for higher energy efficiency to ensure that designs and construction features that reduce natural gas dependence are incorporated into all new buildings.*

Residual Significance: *Significant and Unavoidable.*

“LRDP Policies would help reduce emissions from University operations, but not to a less-than-significant level....the impacts would remain significant and unavoidable (p4.2-29).” Given the significant impact of full build out at proposed in the 2008 LRDP, and the significant residual impacts even with full implementation of the proposed mitigations, Santa Barbara Audubon recommends:

- 1) **Reduced Enrollment Alternative**, with a cap of 3000 additional students be evaluated. This alternative would reduce impacts to air quality, transportation, water, aesthetics. Services to students could be enhanced with incorporation of aspects of the Virtual University Alternative. Commensurate reductions in academic space, faculty and staff are needed. The analysis could determine if this level of development could be accommodated.
- 2) **Transit Plan.** A comprehensive transit plan that encourages public transit, bicycle and pedestrian use, and car-sharing is needed. The current mix of alternative transit use is presented, and the University has done a lot to encourage the use of alternative transportation. Housing the new growth of students, faculty and staff on campus will reduce traffic impacts but not eliminate trips to the surrounding cities and region for grade schools, shopping, job, and recreation. Goals and mechanisms are needed, with adaptive management needed where goals are unmet.
- 3) **Green building policy.** Maximum energy efficiency is needed due to the significant residual impacts; the mitigations are stated to be insufficient, thus *maximum* mitigations are required under CEQA. The LEED certification goals should be Gold and Silver, not the lowest level of “certified.”

Consistency with the 2007 Clean Air Plan (CAP)

According to the Recirculated Air Quality Section of the DEIR, the region *currently* does not meet the state standards for ozone and PM₁₀. “*The 2008 LRDP would not be consistent with the 2007 CAP because the projected growth of the campus was not accounted for in the SBCAG forecasts.*”

The document states the one of primary objectives of the LRDP Transportation Chapter is a “*pedestrian-oriented academic core with increasing opportunities for alternative forms of transportation especially bicycles (p4.2-28).*” For the campus, this seems to be effective if the policies are implemented.

“*The follow policies from the LRDP will help reduce vehicle emissions and area source emissions:*

TRANS-8. *Mesa Road may be widened west of Ocean Road to accommodate bike-lanes and pedestrian paths (p4.2-28).*

Comment: This is an inadequate mitigation, “*may*”! This must be a **commitment for implementation**, given the unmitigated impacts of vehicle emissions. Additional dense campus housing is planned west of Mesa Road, and the bike lanes and pedestrian paths will be needed to improve safety and encourage alternative transportation between housing and the main campus. Note: At the time of widening of Mesa Road, the University sewer lines should be relocated out of Storke Wetland, and coordination with Goleta West Sanitary District for re-location of their sewer lines to Mesa Road. These actions will allow for restoration of tidal circulation of Storke Wetland. See Audubon’s initial comment letter on the DEIR dated June 23, 2008 [Goleta Slough impacts].

TRANS-9. *The campus shall continue to maintain and improve bicycle and pedestrian access way to the beach as necessary to protect sensitive habitat areas and public safety.*

Comment. No commitment or goals are provided. Suggested are specific benchmarks, such as a new stairway to the beach from West Campus Bluffs when the first campus housing is constructed at the Devereux School site.

ACC-3. *The University, in cooperation with Metropolitan Transit District, shall ensure that regular bus and/or shuttle service is provided between all University housing and the Main Campus.*

Comment. This is crucial to the reduction in emissions from transportation. This is a significant component of the **Transit Plan** that the University should develop. Funding mechanism should be explored, and adaptation of measures such as frequency of service to meet benchmarks of shuttle utilization and reduced auto use from campus housing to the main campus.

ACC-4. *The University shall work with MTD to provide transit service to campus neighborhoods and shall provide new bus or shuttle stops in each housing development to maximize convenience and increase transit ridership.*

Comment. The University *must* work in partnership with MTD *and provide funding for new routes/frequency of service* so that the alternative transportation system is convenient and time-efficient, and thus utilized. Construction of bus stops is insufficient to mitigate the impacts of additional people.

Global Comments on Clean Air Plan Consistency. Santa Barbara Audubon recommends two major measures to increase compliance with the Clean Air Plan. These are necessary as *already* air quality in the region fails to meet state standards.

- 1) **Reduced Enrollment Alternative**, with a cap of 3000 additional students to be evaluated. This alternative would reduce impacts to **air quality, transportation**, water, and aesthetics; no way to evaluated with presented data if the impacts can be reduced to insignificance.
- 2) **Transit Plan**. A comprehensive transit plan is needed. It must address the needs of the new campus residents not only for transportation on campus but in the community and region. Expanded Car-sharing, with cars available at each housing “pod” and several places on campus, is needed. This should be a paid service, but all faculty and students should be provided with information that shows how this saves money and greenhouse gas emissions to avoid having a private car, or for families, perhaps an alternative to a second car. Bus or shuttle service to the Goleta train station needs to be improved, and publicized. A no cars policy for freshmen or freshmen/sophomores should be evaluated, and enforcement of the existing policy of no parking permits for those who live within one mile of campus. Exemptions could be made where public transit access from the off-campus housing to campus is demonstrated to be unavailable.

CLIMATE CHANGE.

The California Global Warming Solutions Act (AB32) was adopted in 2006, in response to the governor’s Executive Order (S-3-05) for targets to reduce greenhouse gas emissions. By 2020, greenhouse gases are to be reduced to 1990 levels; by 2050, to 8% below 1990 levels (p4.2-43). First we will address the specific measures that the document addresses, then provide our “global” response.

AB 32 Scoping Plan Measures--applicable to the LRDP (Table 4.2-15).

SPM-3: Energy efficiency. *Maximize energy efficiency building and appliance standards...green building standards.* The LEED “Certified” rating to which the campus will strive is the lowest certification rating. We assert that, given that the University seeks the *maximum* energy efficiency, LEED Gold or Platinum level, should be sought.

SPM-4: Renewables Portfolio Standard. *Achieve 33 percent renewables...*

SPM-12: Million Solar Roots Program. *Install 3,000 MW of solar-electricity capacity....* Given the extensive construction planned, and the delay likely in renewable energy in the utility sector, and the stated University commitment to sustainability, Audubon recommends an intensive renewable energy program within the university--most probable photovoltaic and solar hot water. (See Campus Sustainability Plan comments). This is an opportunity for the University to demonstrate sustainability.

The draft and recirculated EIR lack analysis of increased energy use at build-out, and the percentage of this increase that would met with the 3000 MW of solar-electric capacity. There is no way to evaluate if this is adequate mitigation.

SPM-8: Water. *Continue efficiency programs and use clearer energy sources to move water...*An aggressive water efficiency program and use of recycled water for landscaping in any remote campus sites and calculation of potable water savings possible with recycled water for toilets in new construction is needed. 20% of electricity in CA is used to move water, so use of local water sources, sparingly, can have a great beneficial impact.

SPM-13: Local Government Actions and Regional Targets. *...quantifiable emission reduction targets....* The University can work with local city and county agencies to set regional targets, but can also set its own targets to meet the S-3-05 and AB32 reductions within the University.

SPM-15: Recycling and Waste. *Increase waste diversion, composting, and commercial recycling, and move toward zero-waste.* The document does not appear to set any new goals for waste diversion and composting. Touting current successes is insufficient.

Global Comments on Climate Change and Scoping Plan Measures. It seems impossible for UCSB to meet the emission reduction goals, given the expansion plans. Audubon recommends two means of at least addressing the reduction targets in a meaningful way:

1) **Reduced Enrollment Alternative**, with a cap of *maximum* cap of 3000 additional students and commensurate reductions in academic space, faculty and staff. This would reduce the *increased* emissions from campus growth, however “green” the development.

2) **Comprehensive Sustainability Plan, including alternative energy and transit plan.** This is discussed throughout these comments.

Campus Sustainability Plan.

The Plan goals and objectives are laudable. However, the Energy goals of a Climate Neutral Plan by 2008 (its now 2009), greenhouse gas emissions to 2000 level by 2010, and 1990 levels by 2020 seem unattainable with the implementation of the proposed LRDP development (Short term goals p4.2-50). There is nothing in the document that leads one to believe its possible, as mechanisms to achieve these targets are missing.

Intermediate and long term goals (SP-3; p4.2-50):

Use 33% less electricity than 2010 baseline by 2050. Where is the data? Current use, about needed for full build-out of LRDP, and how this could be reduced by 33%? The analysis is inadequate.

Reduce fossil fuel usage to 20% of total consumption (used in natural gas fired cogeneration). Where is the data of current usage, anticipated fossil fuel usage at full build-out under “business-as-usual” and mechanisms to avoid that increase and in fact reduce use by 20%? What facilities are suitable for cogeneration? No information was found in the document.

Increase photovoltaic production of 7% of total consumption--about 4.2 million kWh per year. Is this planned photovoltaic installations on campus? All new buildings should provide photovoltaic or at a minimum solar hot water. Parking garages can have solar installations on the upper level, with carport-like structures if not covered. How is the 7% calculated? Current use, electrical use at full build-out under “business-as-usual” scenario, “saved” use with photovoltaic installations....

Increase wind energy production to 20% of total consumption--about 12 million kWh per year. Presumably this is a component of purchased electricity from the local utility. Is there any research to see if that is a likely scenario? The first wind power facility in the county has just been approved. When completed, this project will provide 10% of the county’s electricity (at current levels). We don’t see any opportunity for UCSB to have wind power on its own.

*Increase new green technology to 6% of total consumption--*We don’t know what this means!.....

The university will look into marketing of emission credits as a means to bridge the cost feasibility gap for green power projects.

There appear to be numerous mechanisms for funding alternative energy and sustainability projects. See the attached articles ([Audubon_attachments.jpg](#)):

“Colleges wean off fossil fuels” Christian Science Monitor, March 5, 2009. The American College and University Presidents’ Climate Commitment now has 614 colleges and universities has committed to becoming carbon neutral. The article states that donors are willing to sponsor campus environmental projects.

“City officials flip switch on rooftop solar panel” Santa Barbara News-Press, March 12, 2009. The City of Santa Barbara has just completed a rooftop solar installation on the city corporate yard garage on Garden Street. The city was able to finance the installation through a power purchasing agreement with Tioga Energy. In exchange for Tioga paying the upfront costs, the city pays for the electricity generated with a 20-year contract. The rate is just less than they have been paying to power the building, and will insulate the city from electricity price increases in the future.

There are probably many other mechanisms that can provide funds for renewable energy, green building efficiency efforts, and alternative transportation transit plans that address climate change. This is an opportunity for the University to be a model of sustainability.

WATER

The recirculated dEIR on water paints a more optimistic picture than the original dEIR, primarily by looking at the proposed expansion of recycled water capability of the Goleta Sanitary District (GWD), and possible customers’ use of recycled water to free up potable water. There are several problems with the evaluation:

- 1) Need for funding of the expanded recycled water treatment and treatment to a higher quality of water that could be utilized by users such as flower growers.
- 2) Lack of commitment of growers and other potential users if this water became available.
- 2) The notion that any “freed up” or offset potable water in GWD would be available for UCSB.

Section 4.14.21, p4.14-26 Standards of Significance.

Audubon concurs with the Goleta Water District that the standard of significance should be:

“If the University’s 2008 LRDP potable water demand exceeds the District’s available potable water supply in the planning period, it is a Class I significant and unavoidable impact.”

The comments by the Goleta Water District state that the University underestimates water demand and overestimates the water supply in the community.

There would need to be negotiations with the GWD for expanded water allocations, probably funding for the expanded recycled water capacity and improved water quality, funding for the outreach program for potential users of recycled water, and commitment that UCSB could increase their allocations by the amount of potable water preserved by these measures.

There are clearly other developments that have or have not been considered that are not currently part of the GWD evaluation of future water needs, just as the LRDP expansion is not included. Thus it is inappropriate to assume that any future water not already allocated would be available to UCSB.

Regarding recycled water consumer, the Glen Annie Golf Course currently uses about 20% of the recycled water produced locally. They are considering plans to dismantle the golf course to build housing or other non-golf course uses. This could *decrease* demand for recycled water and increase demand for potable water.

The projected 856 AFY additional needed at full build out for the LRDP is more than is likely to be available in the GWD. The calculated needs remains about 498 AFY beyond the current allocation. In fact, the GWD states the baseline should be about 700 AFY, as about 150 AFY is for approved but not constructed facilities.

Audubon recommends several strategies for addressing this water deficit:

- 1) **Reduced alternative** with a student cap of 3000 and commensurate reductions in academic construction, faculty and staff. A calculation of the water demand under this alternative is needed.
- 2) **Water duty factor reduction**, to be achieved by aggressive water efficiency efforts for all new construction, and retrofit of existing buildings. Examples would be waterless urinals, which have been installed in some locations on campus.
- 3) **Recycled water use expansion** at all campus sites.
 - a) Looping of “dead end” reclaimed water lines to improve reliability. This was mentioned in the original dEIR as a means of improving reliability but was not proposed as part of the LRDP. It should be.
 - b) Extend recycled water lines to all campus sites; probably lines are not in place to the Devereux School site, the Storke Family Housing or North Campus housing. The 90% landscaping use of recycled water can be expanded to 100%.
 - c) Use of recycled water for toilets should be re-evaluated, and the offset of potable water use calculated.

Mitigation W-3A.

New UCSB development shall make use of recycled water to the maximum extent feasible. Recycled water will be used for bathroom fixtures and/or irrigation.

Given the GWD’s lack of market for recycled water or funds for expanded distribution, it behooves the University to create market to the *maximum extent feasible*. This mitigation should state “**Recycled water will be used for bathroom fixtures AND irrigation.**” See 3c above.

Audubon opposed the purchase of State Water Project allotment as an unreliable source of water, especially during drought conditions. We are currently in the third year of drought, and water deliveries are likely to be 15% of demand (this may have been increased recently to 20%). The funds to purchase an allocation of water that may not be available when needed could better be spent on water conservation and plumbing to utilize recycled water. Limitation of growth within sustainable water availability is a must. As climate change worsens, even with successful measures to combat it, California’s climate is forecast to become more variable--more extremes

of wet years and dry years. Thus the State Water Project can be expected to become less reliable than it is currently.

TRANSPORTATION

The expanded analysis of impacts of more cars anticipated with build-out of the LRDP, and the poor *existing* level of service of intersections near campus, are evaluated in the recirculated dEIR. To Audubon, this demonstrates that a comprehensive transit plan that de-emphasizes private vehicles is needed to address the transportation needs of the current and future residents/ students and employees of the campus, and of the surrounding community.

Granted, the University is not offering to mitigate the impacts of all these additional cars. However, the cost is likely to be lower and transportation improved if alternative transportation is primary and private vehicles secondary. Foundations and private donors may be willing to help fund a model transit program that could be replicated in other campus communities.

Audubon includes all comments by reference on the Transportation Section from our June 23, 2008 letter.

Audubon recommends two general strategies for addressing transportation impacts:

- 1) **Comprehensive Transportation Plan.** See elements, below.
- 2) **Reduced enrollment alternative.** Evaluate the transportation impacts with a cap of 3000 students.

Table 4.13-9 Bicycle, Pedestrian and Vehicle Traffic Signal Warrants--Existing Conditions. *If delay to motor vehicles from pedestrians and bicyclists is a community priority, a traffic signal with pedestrian and bicycle signals may be warranted at these intersections based on volume criteria.*

Comment: This table evaluated the intersections on Embarcadero del Norte, and demonstrates the high pedestrian and bicycle use in Isla Vista. The comment accompanying the table, unfortunately, demonstrates the car-centric nature of the dEIR analysis. It suggests that *if the cyclists and pedestrians delay cars*, then signals might be installed. What about safe mobility for cyclists and pedestrians??

Parking (p4.13-30)

The LRDP proposed to provide one parking space for every four students residing on the Main Campus (p4.13-43). Audubon recommends that the University explore prohibition of autos for all students living on campus, for all freshmen and sophomores, and all freshman. The documents do not mention the costs to students who have a car on campus. Many campuses prohibit students, at least some, from having cars on campus. Serious analysis is needed to develop the appropriate strategies for UCSB.

Pricing mechanisms for parking a second car should be explored for families living in UCSB housing, and alternatives such as Zip car membership, shuttles to campus and MTD service to the community should be available and sufficiently convenient that second cars are an infrequent choice.

These are not *niceties*, but significant mechanisms for addressing traffic jams, air quality, and global warming.

TRANS-8. *Mesa Road may be widened west of Ocean Road to accommodate bike-lanes and pedestrian paths.*

Comment. Change to “Mesa Road *shall* be widened...to accommodate bike lanes and pedestrian paths.” As mentioned in the Air Quality section, above.

New walkway along Devereux Road at West Campus (4.13-27).

We didn’t find any additional information about this walkway. However, the existing road is very narrow, with wetlands on both sides (constructed on fill in the wetland when a private estate). One-way vehicular traffic, which has been considered, is a must if a walkway is to be provided. This would improve pedestrian and bicycle safety.

As mentioned in the Audubon Comment letter 6/2008, Slough Road Improvements, the circulation improvements should be accompanied with improvements to the hydrology, by replacing the culverts under the road.

Table 4.13-56 Peak Hour Intersection Operations--Santa Barbara County...

The EIR states the University will fund a “Proportional share” of intersection improvements, and the County should be responsible for the improvements. However, El Colegio and Los Carneros/Mesa Road are almost exclusively University-related traffic. For these intersections close to campus, the University should assume the majority of funding responsibility.

Comprehensive Transportation Plan Needed.

Some elements suggested for a comprehensive transportation system could include:

- 1) Comprehensive bicycle routes and parking on and between all UCSB campuses. Given the high usage of bicycles now, this is crucial to the program. Ensuring that bicyclists can safely and efficiently cross the modified Ocean Road is a major requirement of the program.
- 2) An electric shuttle between all housing clusters and academic facilities. This could be operated separately by campus or by MTD, if negotiated and funded.
- 3) MTD-coordinated service to campus and to middle school, high school, shopping and recreational destinations. High levels of service will encourage usage. This will require long-term operational funding for MTD.
- 4) Expansion of the Zip Car service, with cars available at all housing clusters and on the main campus.
- 5) Improved connection to the Goleta train station.

The bus system would benefit from an electronic announcement system, so riders know when the next buses are arriving for various routes. This is common in commuter train and subways, less so for bus systems. Audubon suggests working with MTD, seek grant funding, for a demonstration system for the campus.

A Bren School student project could address some of these issues, such as the incentives, disincentives, and prohibitions that could influence transit choices of students, faculty and staff.

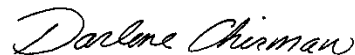
Evaluation of other campuses, and recommendations for a transit program would be an excellent project and could benefit the campus and community.

The traffic impacts need to be “pre-mitigated” due to the already poor level of service of some intersections, and to maintain public safety for bicyclists and pedestrians. Prohibition of cars for freshman and possibly other students living on campus can be implemented for the new class as soon as the LRDP is approved, So can enforcing the no parking permit regulations already in place. Improved bus service, and free bus passes for staff and faculty, could be instituted early on.

Summary.

Santa Barbara Audubon is disappointed that the recirculated EIR does little to reduce the impacts of the proposed LRDP increased enrollment and expansion of academic space. Significant work is still needed to mitigate the impacts, and evaluate in greater detail a reduced-enrollment alternative. The comments received from the Goleta Water District, the City of Goleta, and the County of Santa Barbara should also be considered, to modify the plan and expand mitigations to create a truly sustainable University that is compatible with the community.

Sincerely,



Darlene Chirman, President