CRITIQUE OF SBCC DRAFT EIR

1. Meteorology/Air Quality Section

The Summary (p.141) statement totally ignores the calculations showing that the emissions from mobile sources due to the proposed action will decrease from 1973 - 1990 for CO (-68.6%), HC (-50%), and NOx (-50%). Particulates and Sulfur Oxides will increase by 30% (incorrectly shown as constant on the table) however the actual amount is negligible: Particulates increasing from 34 to 44 lbs and Sulfur Oxides from 11 to 15 lbs annually.

The comparison with the total emissions on the South Coast is only valid for the 1973 amounts since there is no valid way of predicting whether or not the South Coast mileage will be proportional to the projected SBCC mileage at any time in the future. Hence, the conclusion should be that the current contribution of SBCC to the South Coast emissions of about 2% will not be exceeded by the proposed action if both are equal.

Finally, it should be emphasized that the summer vacation months of June, July and August are the months of highest incidence of smog and, accordingly, there would be negligible contribution from SBCC induced traffic. This factor should also be introduced in the sections devoted to the air quality background analysis of South Coast.
2. Service Systems

The emphasis on the entire South Coast water situation overshadows the actual impact due to SBCC expansion. The method of determining the gallons per day usage per student factor - dividing the annual SBCC water use by number of students - is crude since it does not allow for the water used by other than students. The value of 35 gpd termed "LOW" is, therefore, actually a high value.

The most elevating factor in the water use projections is the assumption of new faculty, staff and students and their families as residents in the Santa Barbara Water District. The use of the residential user factor of 183 gpd adds some 70% to the estimate of water use by 1990. Since there is no way of knowing the actual number of new people or where they will live relative to the Santa Barbara Water District, the figure of 153 acre feet additional water need must be considered highly problematical.

If one relates water use strictly due to the increase number of students at SBCC expanded campus using the gross factor of 35 gpd per student, one finds that the increase water use would amount to 90 acre feet - less than 25% of the stated current safe yield surplus. Hence, the conclusion that "unless the City of Santa Barbara is prepared to commit half of its entire current safe yield surplus...." is not only negatively phrased but is highly speculative based, as it is, on other than actual water use by students on campus.
Finally, no mention is made of the fact that only a small number of students will be on campus during the dry summer months when water supplies are most critical.
COMMUNITY DEVELOPMENT DEPARTMENT

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March 24, 1975

Dr. Glenn G. Gooder, Secretary/Clerk
Board of Trustees
Santa Barbara City College
Room A 150
721 Cliff Drive
Santa Barbara, California 93109

Dear Sir:

Following are the comments of the City Planning Division on the Environmental Impact Report for the Santa Barbara City College Master Facilities Plan.

1) The road from Plaza del Mar-Pershing Park should be very carefully designed and constructed so that the least possible damage is done to its wooded environment and to the historic stone wall. If portions of the wall must be disturbed, then they should be replaced with the same stones so the wall's integrity is preserved. We question the use of the word "none" on P. 181 under "history".

2) At Capacity 5040, Figure 14 shows 706 parking spaces in Pershing and Leadbetter Parks, which would evidently be provided in a parking structure. We strongly question the advisability of placing a large structure of this type in a City park. It would be out of character with use of the area. Another important point is that the structure appears to be located immediately in front of the new Old Spanish Days Carriage Museum, thus completely blocking the museum from view and preventing access for floats housed in the museum.

3) On Pages 34-36 "Architectural Character" there is only slight reference to designing the campus buildings in context with the "Santa Barbara Character". Some of the newer structures on the east campus have seriously lacked this recognition of the unique community in which the college is located. Many architecturally sensitive members of the community have been disappointed with this tendency and hope that the Board of Trustees corrects this deficiency in plans for all future buildings. We agree with statements on Pages 127 and 195.

4) On Pages 41-42 the report should emphasize that the outdoor lighting fixtures should be designed and located so as to prevent intrusion of lighting glare into residential areas. Avoid offensive light sources in general.

5) A correction on P. 79, first line under "history"--Cabrillo was a Portuguese exploring for Spain, but not a Spaniard. Also, the
Portola expedition was 227 years later, not 225. It is highly regrettable that this same paragraph makes no mention of the Santa Barbara Presidio as the origin of the city—founded in 1782. It was one of only four such forts in California. On Page 80 "Dibblee" and "Hunt-Stambaugh" are misspelled. Also on P. 136.

6) On P. 127, No. 4, the words "and hotel" should be placed after "residential" in the first line.

7) We appreciate the comments on Pages 131-133 with respect to air quality, view protection, and lighting.

8) On Page 136 under "Archeology" mention is made of disturbance to archeological materials when the access road is improved. However, the extent of the improvements and the disturbance are not given (also P. 181).

9) Under "history" on P. 136 no mention is made of the site of the castillo for the Presidio, an artillery bastion with earthen embankments which existed in the southeasterly portion of the east campus. It served as a defense from naval attack for the Spanish Presidio. The approximate location is an important historic site.

10) On Pages 146-147 mention is made of future street improvements to accommodate increased traffic congestion from increased enrollment. However, there is no indication of the extent of the improvements needed. Also, it should not be assumed that the City will widen any of the streets in the area of the campus.

11) We do not agree with the statement in the second paragraph of Page 178 that beach users would be willing to use the parking structure in Pershing Park.

12) Page 183 contains a very broad estimate of additional water needs, and we believe the Public Works Department should speak to this matter.

13) Page 184, the last sentence states that pressures on beach parking will be substantial. We feel this is an avoidable impact with adequate provision for parking on-campus.

14) The adverse impact on City parks and on the Carriage Museum by the proposed Pershing Park parking structure is not mentioned in the report. Also, the 1980 plan shows parking in the museum's driveway.

15) We regret the plan's lack of policies and programs which might be devised by City College to promote travel to and from the campus by some other means than automobile. The need is mentioned, but no programs offered.

Thank you very much for the opportunity to read the report and comment.

Sincerely,

BRUCE N. THOMPSON, A.I.P.
City Planning Director

By MARY LOUISE DAYS
Planning Technician