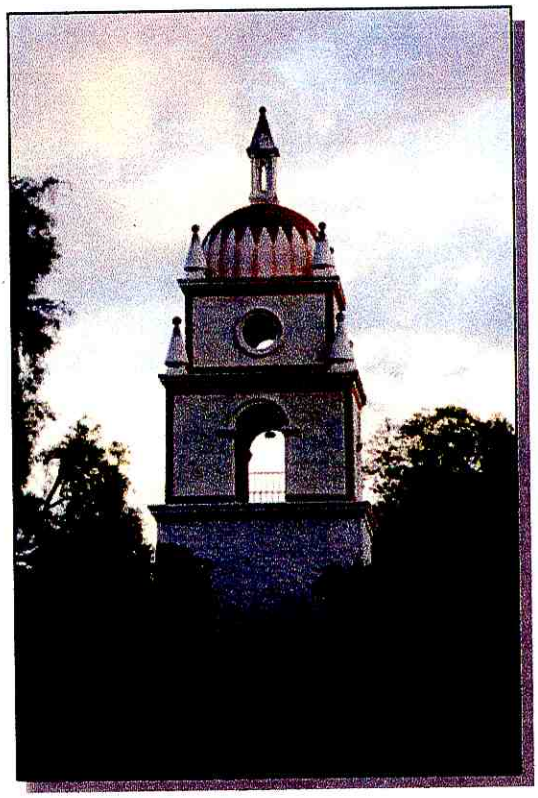
Final Program Environmental Impact Report
for

California State University, Channel Islands

Campus Master Plan
15,000 FTES



State Clearinghouse Number 98021053

Prepared For:

Trustees of the California State University
400 Golden Shore
Long Beach, California 90802-4275

Locally Represented by:

California State University Channel Islands
P.O. Box 2862
Camarillo, California 93011-2862

Prepared by:

Rincon Consultants, Inc.
790 East Santa Clara Street, Suite 103
Ventura, California 93001

August 31, 1998

rincon

Environmental Scientists Planners Engineers

Final Program Environmental Impact Report for California State University, Channel Islands Campus Master Plan 15,000 FTES

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The Trustees of the California State University
400 Golden Shore
Long Beach, California 90802-4275

Locally represented by:

California State University, Channel Islands
P.O. Box 2862
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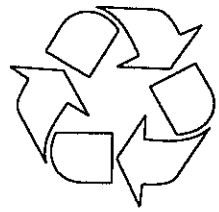
August 31, 1998



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PREFACE

This document, along with the Draft Program Environmental Impact Report dated June 4, 1998, constitute the Final Program Environmental Impact Report (FEIR) for the California State University, Channel Islands Master Plan. The information presented in this document has been provided in accordance with the requirements of the California Environmental Quality Act (CEQA) and the State EIR Guidelines. Per Section 15132 of the Guidelines, this Final Program EIR incorporates the Draft Program EIR, includes the comment letters received regarding the adequacy of the Draft Program EIR, responses to those comments, a list of persons, organizations, and public agencies commenting on the Draft Program EIR, and revisions to the Draft Program EIR in response to comments and to add informational clarifications.

California State University, Channel Islands
Campus Master Plan Final Program EIR
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List of Tables

SECTION A. COMMENTS AND RESPONSES

This section of the Final Program Environmental Impact Report (EIR) for the California State University, Channel Islands Master Plan contains all of the written comments received regarding the Draft Program Environmental Impact Report during the 45 day public review period of June 5, 1998 to July 21, 1996. Each comment received by the California State University (CSU) has been included within this report. Responses to all comments have been prepared to address the concerns raised by the commentors and to indicate where and how the EIR addresses environmental issues. Where appropriate, changes made in the Draft Program EIR in response to these comments are indicated in the response and the actual EIR revisions are contained in Section C of this volume. This document in conjunction with the Draft Program EIR constitutes the Final Program EIR to be presented to the Trustees of the University of California for certification prior to decisions on acceptance of control of the former Camarillo State Hospital site from the State Department of General Services and adoption of the proposed Master Plan.

The specific comments contained within any particular written letter has been numbered if not previously done in order to provide a reference to it in the response. Each letter is presented first, with the responses following. In some instances, comments were numbered already, but in order to properly address the issues raised, they have been renumbered.

A total of 11 public agencies prepared written comments on the Draft Program EIR. They are listed below in the following order: state agencies, federal agencies, and regional and City agencies. A total of 26 comment letters were received from public agencies, organizations, and citizens. The following lists those individuals and agencies from whom comment letters were received. This list will be used for referencing in this comment and responses section.

1. Antero Rivasplata, California Office of Planning and Research
2. Cherilyn Widell, California Office of Historic Preservation
3. Stephen Buswell, California Department of Transportation
4. Arthur E. Eck, National Park Service, Santa Monica Mountains National Recreation Area
5. Stephen Beal, Department of the Navy, Pt. Mugu NAWS
6. Stephen Beal, Department of the Navy, Pt. Mugu NAWS
7. Matthew Boden, City of Camarillo
8. Richard Hajas, Camrosa Water District
9. Richard Burgess, City of Thousand Oaks
10. Thomas Berg, County of Ventura Resource Management Agency
11. Ginger Gherardi, Ventura County Transportation Commission
12. Richard Baldwin, Ventura County Air Pollution Control District
13. Deborah Bechtel, Community & Children's Advocates Against Pesticide Poisoning
14. Kathy Brooks
15. Arla B. Crane
16. Janis McCormick, Environmental Coalition
17. Kim Uhlich, Environmental Defense Center
18. Alyson Kaye

19. John Kerkhoff
20. John Kerkhoff
21. Matthew Lorimer
22. Scott Mitchell
23. David Ruth, Save Our Somis
24. Alan Sanders, Sierra Club
25. Robert Silva
26. Mike Stubblefield

State of California

GOVERNOR'S OFFICE OF PLANNING AND RESEARCH

1400 TENTH STREET
SACRAMENTO 95814

PETE WILSON
GOVERNOR

PAUL F MINER
DIRECTOR

(1)

July 21, 1998

GEORGE DUTRA
CALIFORNIA STATE UNIVERSITY, CHANNEL ISLANDS
1878 SOUTH LEWIS ROAD
PO BOX 2862
CAMARILLOH, CA 93011-2862

Subject: CALIFORNIA STATE UNIVERSITY CHANNEL ISLANDS SCH #: 98021052

Dear GEORGE DUTRA:

A

The State Clearinghouse submitted the above named environmental document to selected state agencies for review. The review period is closed and none of the state agencies have comments. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call at (916) 445-0613 if you have any questions regarding the environmental review process. When contacting the Clearinghouse in this matter, please use the eight-digit State Clearinghouse number so that we may respond promptly.

Sincerely,

ANTERO A RIVASPLATA
Chief, State Clearinghouse

CSUCI

Notice of Completion

SCH # 98021053

Mail to: State Clearinghouse, 1400 Tenth Street, Sacramento, CA 95814

Project Title: Campus Master Plan of the California State University, Channel Islands

Lead Agency: California State University, Channel Islands

Contact Person: Mr. George Dutra, Director, Facilities Planning
Phone: (805) 383-8400

Address: 1878 South Lewis Road
P.O. Box 2862
Camarillo, CA 93011-2862

FILED
JUN 5 19[illegible]
STATE
CLEARINGHOUSE

County: Ventura

Project Location:

The CSU CI campus is located 4.5 miles south of U.S. Highway 101 at 1870 Lewis Road, south of the City of Camarillo, California. The property was formerly operated as a California State Hospital, caring for patients with mental and developmental disorders. The property consists of 634 acres that was developed as a hospital beginning in 1932.

Document Type:

Program Environmental Impact Report

Local Action Type:

Master Plan

Development Type:

University with 15,000 Full Time Equivalent Students; Residential with 900 dwelling units; Science and Technology uses with 340,000 Gross Square Feet; K-8 School/Day-care Center.

Project Issues Addressed in Document

■ Aesthetic/Visual	■ Flood Plain/Flooding	□ Schools/Universities	■ Vegetation
■ Agricultural Land	□ Forest Land/Fire Hazard	□ Septic Systems	■ Water Quality
■ Air Quality	■ Geologic/Seismic	■ Sewer Capacity	■ Water Supply/Groundwater
■ Archeological/Historical	□ Minerals	■ Soil Erosion/Compaction /Grading	■ Wetland Riparian
□ Coastal Zone	■ Noise	■ Solid Waste	■ Wildlife
■ Drainage/Absorption	■ Population/Housing Balance	■ Toxic/Hazardous	■ Growth Inducing
□ Economic/Jobs	■ Public Services/Facilities	■ Traffic/Circulation	■ Land Use
□ Fiscal	□ Recreation/Parks		■ Cumulative Effects

State Clearinghouse Contact: Ms. DeLicia Wynn
Terry Rivasplata
(916) 445-0613

State Review Began: 6-5-98

Dept. Review to Agency 7-13

Agency Rev to SCH 7-17

SCH COMPLIANCE 7-20

Please note SCH Number on all Comments

98021053

Please forward late comments directly to the Lead Agency

AQMD/APCD: 39 (Resources: 6, 6)

Project Sent to the following State Agencies

- X Resources
- ____ Boating
- ____ Coastal Comm
- X Coastal Cnsv
- ____ Colorado Rvr Bd
- ____ Conservation
- X Fish & Game # 5
- ____ Delta Protection
- ____ Forestry
- ____ Parks & Rec/OHP
- ____ Reclamation
- ____ BCDC
- X DWR
- ____ OES

Bus Transp Hous

- ____ Aeronautics
- X CHP
- X Caltrans # 7
- X Trans Planning
- ____ Housing & Devel

State/Consumer Svcs

- ____ General Services

Cal/EPA

- ____ ARB
- ____ CA Waste Mgmt Bd
- ____ SWRCB: Grants
- ____ SWRCB: Delta
- ____ SWRCB: Wtr Quality
- ____ SWRCB: Wtr Rights
- X Reg. WQCB # 4
- ____ DTSC/CTC

Yth/Adlt Corrections

- ____ Corrections

Independent Comm

- ____ Energy Comm
- X NAHC
- ____ PUC
- ____ Santa Mn Mtns

CSUCI

PETE WILSON
GOVERNOR

PAUL F MINER
DIRECTOR

State of California

GOVERNOR'S OFFICE OF PLANNING AND RESEARCH
1400 TENTH STREET
SACRAMENTO 95814

MEMORANDUM

July 6, 1998

TO: Lead Agencies and Consultants

FROM: State Clearinghouse Staff TP

RE: 11 Copies Now Required for Distribution

The State Clearinghouse is responsible for circulating draft environmental documents to state agencies for their review and comment. For many years, we have required lead agencies to send us 10 copies of their draft Negative Declarations and EIRs for circulation.

Unfortunately, we now find that in many cases this does not provide us enough copies to consistently provide draft documents to trustee, as well as responsible, agencies. From now on, please submit a minimum of 11 copies of each draft Negative Declaration or EIR to the State Clearinghouse. As always, if you have a project requiring a more extensive state agency review and wish to have additional copies distributed, we are more than happy to do so. Conversely, if you have a small project which you believe does not warrant sending 11 copies, give us a call and we will consider a lesser number on a case-by-case basis.

B

Thank you for your assistance. The additional copy will help the lead agency fulfill its consultation duties and avoid delays by ensuring that an adequate number of copies is available for distribution to state responsible and trustee agencies. It will also help state agencies meet their CEQA obligation to provide you with timely and germane comments. If you have any questions on this matter, please feel free to call Terry Rivasplata, Chief of the State Clearinghouse, at (916) 445-0613.

CSUCI

State of California

GOVERNOR'S OFFICE OF PLANNING AND RESEARCH

1400 TENTH STREET
SACRAMENTO 95814

PETE WILSON
GOVERNOR

PAUL F MINER
DIRECTOR

July 23, 1998

GEORGE DUTRA
CALIFORNIA STATE UNIVERSITY, CHANNEL ISLANDS
1878 SOUTH LEWIS ROAD
PO BOX 2862
CAMARILLOH, CA 93011-2862

Subject: CALIFORNIA STATE UNIVERSITY CHANNEL ISLANDS SCH #: 98021053

Dear GEORGE DUTRA:

C

The enclosed comments on your draft environmental documents were received by the State Clearinghouse after the end of the state review period. We are forwarding these comments to you because they provide information or raise issues which may assist you in project review.

Lead agencies are not required to respond to late comments. However, you may wish to incorporate these additional comments into the preparation of your final environmental document.

Please contact at (916) 445-0613 if you have any questions concerning the review process. When you contact the Clearinghouse in this matter, please use the eight-digit State Clearinghouse number so that we may respond promptly.

Sincerely,

Antero A. Rivasplata

ANTERO A. RIVASPLATA
Chief, State Clearinghouse

Enclosures
cc: Resources Agency

Letter 1

Commentor: Antero Rivasplata, Chief State Clearinghouse
California Governor's Office of Planning and Research

Dates: July 21, 1998 and July 23, 1998

Responses:

A. Information provided by the State Clearinghouse indicating compliance with CEQA review period requirements. No response is necessary. It is noted that several state agencies did have comments, which are included in this section.

B. The State Clearinghouse indicates that 11 copies of Negative Declarations and EIRs should be provided to the Clearinghouse rather than 10, as had been customary. The comment is noted.

C. The Chief of the Clearinghouse notes here that letters were provided to him by other state agencies after the close of the official comment period, and that there is no legal requirement to respond to them. Nevertheless, these letters, from the Office of Historic Preservation and from the Department of Transportation, are included and responded to herein as numbers 2 and 3.

STATE OF CALIFORNIA — THE RESOURCES AGENCY PETE WILSON, Governor

OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION
P.O. BOX 942896
SACRAMENTO 94296-0001
(916) 653-6624
FAX: (916) 653-9824

(2)

July 15, 1998

George Dutra, Director Facilities Planning
California State University, Channel Islands
PO Box 2862
Camarillo, California 93011

Dear Mr. Dutra:

Thank you for the opportunity to comment on the draft EIR for the Channel Islands Campus Master Plan. The State Office of Historic Preservation is the principal state agency charged with administering federal and state historic preservation programs in the State of California. The SHPO makes determinations of eligibility for listing on the National Register of Historic Places and the California Register of Historical Resources. The State Office is mandated under Public Resources Code section 5024.6(j) to confer and comment on publicly funded projects and programs undertaken by state and local agencies. In addition under section 5024.5 state agencies must confer with the State Historic Preservation Officer on proposed projects which may affect state owned historical resources.

The proposed Channel Island campus of CSUS will be located on the site of the former Camarillo State Hospital and will adaptively reuse a large majority of the existing hospital facilities. The hospital and its planned and landscaped grounds are eligible for listing on the National Register of Historic Places due both to their significance in the history of public health and social policy and to their architectural distinction.

A The conversion of the historic hospital to a university campus is an adaptive reuse project of unprecedented scale. The SHPO concurs with the EIR conclusion that the adaptive reuse of the majority of the historic buildings within the site would be considered a potentially environmentally beneficial effect of the proposed project.

However, the SHPO has some concerns regarding the adequacy of the EIR impact analysis and feels that some of the proposed mitigation are not adequate to insure less than significant impacts.

Alteration and Adaptive Reuse of Historic Buildings and Grounds

The State Office of Historic Preservation is well aware that the university has taken steps to insure that the adaptive reuse of the former hospital facility will not result in loss of historic integrity of the resource. The university has undertaken a study to identify significant components of the building complex and site, as well as archeological resources, and has conferred with the OHP regarding preliminary reuse planning and architectural design.

B

Although the EIR clearly states the university's intention to preserve the historically significant buildings and grounds, it is silent in regard to how this outcome will be assured. The EIR does not include any mitigation measures in the form of plans, programs, standards, or procedures that clearly lessen the potential for substantial adverse change in the significance of the resource. Despite the university's stated intentions, and its good faith efforts, the EIR must recognize and address the potential that modifications and alterations to the historic buildings and the historic site plan may cause significant impact. The EIR must include clear, enforceable mitigation that would reduce impacts. The EIR should include a mitigation provision that the *Secretary of the Interior's Standards for the Treatment of Historic Properties and Guidelines for Historic Building Projects* will be used as the standard for historic building rehabilitation. Mitigation should also include continued consultation with the SHPO on a project specific basis. The inclusion of these mitigation measures should result in a conclusion that alteration of the historic buildings will result in no significant impact.

East and West Campus Development

C

The project description for development of the East and West campus does not provide adequate information regarding the proposed demolition of the five National Register eligible "employee housing" buildings. To the extent that the Master Plan EIR is intended to also serve as a project specific EIR for the phase 1 development of 900 residential units in the East campus area, it fails to address adaptive reuse or incorporation of the contributing buildings into the planned residential development. It does not provide any information as to whether such an alternative was considered and rejected, or determined to be infeasibile. Without such analysis, there appears to be no evidence in the record to support a finding of overriding consideration.

Archeological Resources:

D

The EIR addresses the possibility of discovery of previously unknown sites in the course of construction. However, the proposed mitigation provision for such accidental discovery only addresses work stoppage and evaluation of significance. Identification and evaluation of significance do not mitigate the impact of damage or destruction. Provision for the recovery of scientifically consequential information from significant sites should be included as a part of this mitigation provision.

If you have any questions, or wish to discuss any of the comments of the OHP, please contact Carol Roland (916) 653-9514 or Dwight Dutschke (916) 653- 9134.

Sincerely,

for Cherilyn Widell
State Historic Preservation Officer

Letter 2

Commentor: Cherilyn Widell, California Office of Historic Preservation
Department of Parks and Recreation

Date: July 15, 1998

Response:

A. The commentor, the State Historic Preservation Officer, concurs with the conclusion of the EIR that the adaptive reuse of the majority of the historic buildings within the site would be considered potentially environmentally beneficial effect. No response is necessary.

B. The commentor states that the outcome of the CSU's intention to preserve historically significant buildings and grounds is not assured. When the lead agency considers the EIR for certification and action on the Master Plan, the EIR will be accompanied by a Mitigation Monitoring and Reporting Plan, as required by state law. This will commit the CSU to an implementation schedule and specific monitoring actions for any of those mitigation measures that the CSU adopts as part of the EIR.

The commentor states that the EIR must recognize and address the potential that modifications and alterations to historic buildings and the historic site plan may cause a significant impact. Page 5.4-6 of the Draft EIR states that "efficient reuse of the facility would nonetheless require demolition of some buildings..." and that some of these "contribute to the historic district nature of the facility." Therefore the Draft EIR does recognize a potential for an adverse impact. However, with the mitigation measures proposed, the impacts are considered less than significant.

The commentor recommends that the *Secretary of the Interior's Standards for the Treatment of Historic Properties and Guidelines for Historic Building Projects* be used to further safeguard the historical features of the site. CSU notes this opinion. In the past, CSU has determined that these guidelines are overly stringent, can conflict with other regulatory requirements, and are not economically feasible for the adaptive re-use of buildings. At the project site, the primary historical resource is the exterior architecture of the buildings and their grouping pattern within the site, rather than the interior space, much of which has undergone various revisions over the years. However, inclusion of the Secretary's standards would restrict alterations needed to make the interior space usable for academic facilities, essentially eliminating the feasible use of the site for the proposed university. This is equivalent to the "no project" alternative, the impacts of which are described in Section 7.1 of the Draft Program EIR. It is considered more effective from the standpoint of re-use feasibility and preservation of the critical elements of the historic resource that the CSU maintain a continuing dialog with the State Historic Preservation Officer as design plans for the individual buildings are developed. Therefore, the following mitigation measure will be added to the EIR:

C-3(c) The CSU will continue to consult with the State Historic Preservation Officer for individual adaptive reuse building rehabilitation projects.

C. Specific design details of the East Campus development will not be known until sometime in the future, as acknowledged in the EIR. However, the Master Plan as currently designed would include demolition of the residential housing units during Phase 1, as stated in the Draft EIR under Effect C-3 (see Table 5.4-1). Mitigation measure C-3(b) addresses the reduction of this significant impact through preservation by photographs and documentation. At this time, CSU officials are also investigating the adaptive re-use potential for the Monterey-style Employee Housing Unit No. 1.

Alternatives to this component of the project are analyzed in Section 7.0, *Alternatives*. Both no project alternatives, all of the alternative sites, and the No Redevelopment of East Campus alternative all assume no change to the employee housing area. With respect to this issue, they would be superior alternatives. However, it is questionable whether or not the overall benefits to cultural resources that would be yielded by the adaptive reuse of the core campus buildings would be achieved under these alternative scenarios. The project is preserving the major California Mission style exteriors and significant interior design features so as to maintain the historic architecture of the site. A portion of the former employee housing has been identified as potentially significant given its architecture, but particularly its relationship to the core campus. This relationship and the stylistic components of the buildings can be adequately conserved through detailed historic documentation. No statement of overriding considerations would be deemed necessary since, while the employee housing buildings contribute to the historic district, their loss would not in itself eliminate the potential for listing of the campus as eligible to the National Register. As noted above, the employee housing buildings as a group are not considered feasibly re-usable, however, it is possible that the Monterey-style Employee Housing Unit No. 1 may be preserved.

D. In response to this comment, the mitigation measure C-1 will be appended as follows:

If significant resources are encountered or inadvertently damaged, the CSU shall implement the recommendations of the archaeologist with respect to documenting and safeguarding the resource, and restoring or repairing any damaged artifacts or resources.

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, 120 SO. SPRING ST.
LOS ANGELES, CA 90012-3606

(3)

July 15, 1998

MR. GEORGE DUTRA
Director, Facilities Planning
California State University, Channel Islands
1878 South Lewis Road
P.O. Box 2862
Camarillo, CA 93011-2862

Re: IGR/CEQA #980642/NP
Draft Program EIR
Campus Master Plan of the California State University, Channel Islands
City of Camarillo
Ven-034-12.84
SCH NO. 98021053

Dear Mr. Dutra:

Thank you for the opportunity to provide comments regarding the above-named Campus Master Plan of the California State University, Channel Islands in the City of Camarillo. The project is a development of a 15,000 full time equivalent student university campus, residential with 900 dwelling units, Science and Technology uses with 340,000 gross square feet, and K-8 School/Day-care Center.

We have the following comments:

1) State Routes 101 and 34 are expected to operate at an unacceptable level of service at year 2010. The proposed project will have a significant impact on State facilities.
2) The proposed mitigations should be extended to include the modification of US 101/Las Posas Road Interchange (replacement of the Las Posas Road overcrossing may be necessary) to alleviate the anticipated traffic impact.
3) Proposed mitigations should be fully discussed in the document. These discussions should include:
   - financing
   - scheduling
   - implementation responsibilities
   - monitoring

   Any cost for mitigation including widening, signalization, etc., should be paid by the developer.

If you have any questions regarding this response, please feel free to contact the undersigned at (213) 897-4429 and **refer to our IGR/CEQA #980642/NP.**

Sincerely,

STEPHEN J. BUSWELL
Program Manager
IGR/CEQA

cc: Chris Belsky – State Clearinghouse

CS21CJ

Letter 3

Commentor: Stephen Buswell, California Department of Transportation

Date: July 15, 1998

Response:

A. As detailed in the DEIR, the Campus Master Plan project would have a significant effect on State Route (US Highway) 101. The project would not, however, generate significant impacts on State Route 34, as it would add relatively minor amounts of traffic north of Daily Drive (about 1,416 ADT). Funding for the statewide program is generated by a combination of state and federal fuel taxes and motor vehicle fees. Students and staff who own and/or operate vehicles would be subject to these taxes and fees. The DEIR notes that U.S. Highway 101 will require widening with or without the CSUCI project. Also see response to Comment C below for further information on mitigation funding.

B. A supplemental analysis has been completed for the Lewis Road and Las Posas Road interchanges at U.S. Highway 101 to account for the Lewis Road/U.S. 101 interchange improvement project. The interchange improvement project is anticipated to make Lewis Road the preferred freeway access for CSUCI (it will be signed for CSUCI). With the alternative freeway access plan, the traffic additions from the project to the Las Posas Road interchange will be insignificant, and the interchange will operate at acceptable levels of service with buildout traffic volumes. The supplemental traffic analysis is provided in response to Comment A of Letter 7.

C. Mitigation financing and responsibility are discussed in Section 2.3.3. If the Site Authority is approved by the legislature, it may contribute funds to aid in the financing of improvements needed to accommodate traffic associated with the project site. Scheduling of any mitigation and its financing will be dependent on the actual growth that is experienced in the future at the project site and in the region. Monitoring for the mitigation actions to be conducted by the CSU will be contained within the Mitigation Monitoring and Reporting Plan to be adopted by the CSU Board of Trustees if they approve the proposed project. Implementation of road improvements will be the responsibility of those agencies with direct legal jurisdiction for such roads. For example, Caltrans will be responsible for road improvements associated with Highway 101 and partially responsible for improvements on State Route 34. The City of Camarillo will be responsible for local roadway improvements within the city limits. The County of Ventura will be responsible for roadway improvements in unincorporated county jurisdiction, which includes portions of Las Posas Road, Lewis Road, Pleasant Valley Road, Cawelti Road, and Potrero Road. Monitoring for construction work on state and local roads will be the responsibility of the agency with direct jurisdiction for the road alterations.

United States Department of the Interior

(4)

NATIONAL PARK SERVICE
Santa Monica Mountains National Recreation Area
401 West Hillcrest Drive
Thousand Oaks, California 91360-4207

IN REPLY REFER TO:

L76 (SAMO)

July 21, 1998

George Dutra, Director of Facilities Planning
California State University, Channel Islands
P.O. Box 2862
Camarillo, CA 93011-2862

Re: California State University, Channel Islands draft Environmental Impact Report

Dear Mr. Dutra:

Thank you for including National Park Service staff in several meetings held to discuss environmental impacts of the proposed California State University, Channel Island campus. We support the conversion of the Camarillo State Hospital to a state university; however, we have reviewed the draft Environmental Impact Report (EIR) and believe the following concerns need to be more fully addressed.

Traffic Impacts

A

The draft EIR does not provide any planning for public transportation programs other than to offer a list of ideas for public transportation. Potential road widenings are discussed in great detail, from the number of new lanes and increased traffic volumes to necessary additional campus parking. We are disappointed that the only acknowledgement of public transportation was to list programs that might be explored. A prime concern of the National Park Service is the university's potential to promote urban growth and result in permanent loss of unique natural resources in the surrounding western escarpment of the Santa Monica Mountains and in the agricultural Oxnard Plain. The best way to discourage strip development and urban sprawl is to aggressively implement public transportation programs from the outset of the university's operation. The EIR should use trip generation data to calculate numbers of parking places needed at off-site parking lots and numbers of busses needed to bring students, faculty, and visitors to campus. The EIR should then list off-site locations where parking can be implemented and preferably linked to other public transportation hubs and commercial/entertainment centers.

The EIR essentially plans for the worst possible growth scenario without offering adequate mitigation for environmental impacts. We expect a revised EIR to demonstrate willingness to immediately implement public transport programs and offer a strategy for offering increasingly extensive public transportation as university build-out approaches.

CSUCI

Private Housing

B

Given the need to reduce car trips to and from campus, the proposed residential units should be for faculty, staff, and students, with only a minor percentage of units devoted to convalescent and senior citizen housing. The EIR does not make clear how the housing will be allocated to serve school-related housing needs and serve, as well, as a revenue-generating source for school operation. We wish to reiterate the importance of reducing car trips as a way to mitigate environmental impacts generated by aggravating traffic congestion, strip development, and air pollution. Students and faculty should be encouraged to stay on campus as much as possible by providing on-campus commercial facilities and by offering frequently running busses to outside shopping centers. The EIR should address alternative programs and on-site facilities for encouraging the university population to stay at the campus.

Natural Resource Protection

C

The EIR states that there is significant funding available in next year's state budget for acquiring ecologically significant land. We strongly recommend that the university use its state-level partnerships to bring into public ownership the private land that lies directly west of the campus. The National Park Service maintains a land protection plan to guide future land acquisition priorities for the Santa Monica Mountains National Recreation Area. The adjacent property is the westernmost slope of the Santa Monica Mountains and ranks as a state parkland priority fee acquisition property. The entire eastern edge of the property borders on Point Mugu State Park and is ecologically pristine. The property is a logical acquisition to complete parkland ownership to the geographic western edge of the Santa Monica Mountains. Bringing this land into public ownership would be an excellent mitigation measure for environmental impacts. The EIR consultants should speak with land agents at parkland agencies, whether State Department of Parks and Recreation, National Park Service, or the Santa Monica Mountains Conservancy, about acquiring the land. The EIR should then summarize strategies for obtaining the land.

The EIR does briefly discuss establishing a cooperative relationship with adjacent landowners to create a natural reserve around the campus. The State University system operates "ecological reserves" associated with several campuses, and Channel Islands could establish its own reserve. As we noted in our initial comment letter, the National Park Service believes an excellent way to mitigate the increased human presence at the university is to develop a better understanding of causes and effects that influence the long-term integrity of the surrounding fragile ecosystem. We stand ready as a willing partner to work with the school in designing the reserve and identifying and implementing research opportunities.

D

The National Park Service still has considerable concern about trampling of resources on the surrounding hillsides. The National Park Service recommended earlier that a "discovery" trail of a short length be constructed to guide curious students and campus visitors through the fragile vegetation. We did not see any conceptual plan or locations for such a trail in the EIR. Also associated with acquiring the adjacent land is the opportunity to construct a regional trail connector to over 12,000 acres of public parkland in Point Mugu State Park and the federally owned Rancho Sierra Vista/Satwiwa. The southeastern corner of the campus is less than two

D | miles from the western border of the parkland, and the officially established trail connection would offer planned, guided access. The EIR needs to fully address these recreational opportunities that can also reduce random entry and trampling of the ecosystem.

E | We are still concerned about large numbers of students climbing the northeastern ridge of the campus to view concerts at the proposed Ventura County Regional Park Amphitheater. The EIR leaves the responsibility of patrolling the hillsides to amphitheater security. The university's property extends to the top of the ridge above the amphitheater site, and therefore, we strongly recommend the EIR include allocating a higher level of university security to the northeastern area of campus on concert nights.

Elimination of the Golf Course

F | We are encouraged to learn that plans for the golf course have been abandoned. We believe a walkway/bikeway that traverses the perimeter of the campus would be an excellent, more versatile recreational opportunity for campus residents and visitors. Moreover, the facility would be another way for campus users to observe and enjoy the surrounding hillsides without entering them, while also establishing a fuel modification zone between residential units and the natural landscape. A revised EIR should include a diagrammatic conceptual layout of the walkway/bikeway.

Thank you for considering the National Park Service's input on the draft EIR. We look forward to reviewing a revised draft EIR that addresses our and other interested parties' concerns. We know that the university is under a deadline to submit the EIR to the state review board, but we feel strongly that shortcomings in the EIR, in particular traffic concerns, need to be addressed thoroughly before the EIR becomes certified. We have enjoyed working with the university and will continue to be available for consultation. You can reach Nancy Andrews, Chief of Planning, Science and Resource Management, or Melanie Beck, Outdoor Recreation Planner, at our office (805)370-2301.

Sincerely,

Arthur E. Eck
Superintendent

cc: Honorable Elton Gallegly, U.S. House of Representatives
Honorable Judith Mikels, Ventura County Board of Supervisors
Joe Edmiston, Executive Director, Santa Monica Mountains Conservancy
Russ Guiney, Superintendent, Angeles District, State Department of Parks and Recreation

CSUCI

Letter 4

Commentor: Arthur E. Eck, National Park Service, Santa Monica Mountains National Recreation Area

Date: July 21, 1998

Response:

A. CSUCI, CALSTART and the Ventura County Transportation Commission (VCTC) have initiated discussions on how the three agencies will develop and implement alternative travel mode service to the site, including transit. For the smaller Phase 1 development, this will include provision of VISTA service to the campus. A dedicated fixed route system serving the campus would be implemented and expanded as the campus grows. The DEIR also includes a TDM program to reduce vehicular activity generated at the site. Growth-inducing impacts associated with the project were separately considered in Section 6.1 of the Program EIR.

The DEIR addresses potential traffic and circulation impacts and includes mitigation measures to offset project impacts based on a reasonable worst-case traffic generation scenario. The DEIR also discusses the parking requirements for the campus. Determining the size, location and design of an off-site parking program is beyond the scope of the EIR for the project, as this program is not included as part of the project description. In addition, offsite parking has not been identified as a feasible mitigation measure and off-site parking could have its own significant impacts to agricultural resources, local traffic congestion, and aesthetics. Implementation of this type of off-site parking program would require an analysis of the potential impacts and mitigation measures that would be required for its implementation. As part of the CSU's ongoing commitment to working with local and regional agencies to implement a comprehensive alternative transportation system to serve the campus as it grows, CALSTART will be examining the feasibility of offsite parking.

B. The commentor expresses the opinion that only a minor percentage of the housing should be developed to convalescent and senior citizen housing. It is further opined that students and faculty should be encouraged to stay on campus as much as possible.

The Master Plan calls for a range of land uses that could accommodate the needs of students, faculty, and staff on campus. These uses include not only employment centers for research and development operations, but housing and ancillary retail uses to serve the campus and residential community, as stated in Section 3.7 of the EIR. Housing is proposed to be provided within the campus core for 1,000 students at campus build-out. Therefore, the Master Plan area is likely to be more balanced than most campuses from a land use perspective.

With respect to more direct strategies to achieve trip reduction, the CSU has formally committed to work with the County's principal transportation agency, Ventura County Transportation Commission, to provide alternative transportation options to the

campus. As indicated in the EIR, a range of distance learning and satellite programs are also to be used so that while the campus would serve an FTES of 15,000, on-site FTES would be 11,750. This represents a reduction of 7,735 average daily trips when compared to typical campuses.

C. The commentor states the opinion that the EIR consultants should speak with a range of open space management agencies about acquiring adjacent land. The CSU has committed to working with all of its neighbors toward regional planning goals including agricultural and open space protection. To that end, the CSU facilitated meetings with numerous open space agencies during the preparation of the Draft EIR to solicit their concerns. However, under the California Environmental Quality Act, a lead agency may apply mitigation measures only when a significant impact is identified. With respect to open space and recreation, the proposed project is considered a beneficial impact. Through the provision of renewed access to generously-landscaped historic property and recreational opportunities associated with university and residential use development, open space resources will be augmented for the community. In addition, implementation of the proposed project would avoid impacts at the Orchard Site, which is currently in agricultural open space. Since no significant adverse impact has been identified, there is no requirement for the CSU to obtain further land for open space purposes.

With regard to the operation of "ecological reserves" within the State University system, it is the current intent of the CSU to operate the open space portions of the project site in a similar manner.

The Draft EIR includes a mitigation measures that commits the CSU to cooperate with any land conservancy organization devoted to agricultural land preservation or habitat restoration. Please see Mitigation Measure GI-3 in Section 6.0, *Long Term Impacts*. Nevertheless, whereas the CSU has expressed its willingness to cooperate with open space protection efforts, such efforts are not required to mitigate any significant impact being created by the project and would interfere with the statutory responsibility of the CSU Trustees for the regulation of the use of the campus land as provided under Education Code Section 89031.

D. The commentor expresses a concern about the trampling of the resources on the surrounding hillsides, and suggests a trail be designed that guides the curious through the vegetation. Informal surveys conducted at California State University, San Bernardino suggests that very few university users wander in to the surrounding hillsides in that location, which is adjacent to the San Bernardino National Forest lands. In the case of the proposed project, surrounding hillside lands to the east and south are privately owned, while the hillside area to the north is already dedicated to park use as the Camarillo Regional Park. Preparers of the Master Plan believe that it is not desirable to invite campus users into the hillside areas, especially those in private landholdings, and have designed the East Campus area such that it is surrounded by its own recreation/open space. Given the development of a green space buffer area around the East Campus development as indicated in the Master Plan, no significant off-site effects

caused by the local university population are expected. However, at such time that the National Park Service may purchase property adjacent to the CSUCI to implement a regional trail system, the CSU would engage in discussions with the Park Service to assist in achieving each other's mutual goals.

E. The CSU is committed to providing appropriate levels of security for areas within the Campus Master Plan area for which it has jurisdiction, regardless of the timing or nature of concert events on adjacent properties. It is noted that while a portion of the amphitheater would be visible from the project site, the ridge directly above the amphitheater is actually on both Camarillo Regional Park property and the adjoining private land.

F. The suggestion that a revised Master Plan include a recreational bikeway is noted. Bicycle access to the site may be enhanced through the revised traffic mitigation measures requiring increased shoulder widths along Lewis Road and Cawelti Road (See Section C of this report). It is also noted that pedestrian walkways around the core campus and throughout the developed portions of the site already exist. The CSU has committed to providing innovative transportation both to and around the university.

DEPARTMENT OF THE NAVY
NAVAL AIR WEAPONS STATION
521 9TH STREET
POINT MUGU, CA 93042-5001

5

IN REPLY REFER TO:

5090
Ser 83J000E/A-1757
JUN 09 1998

Mr. George Dutra
Director, Facilities Planning
California State University, Channel Islands
P.O. Box 2862
Camarillo, CA 93011-2862

Dear Mr. Dutra:

Naval Air Weapons Station (NAWS) Point Mugu is encouraged by the progress California State University, Channel Islands (CSUCI) is making to bring a new academic institution to Ventura County. As we have stated at various prior meetings with CSUCI staff, we look forward to working with you to develop a mutually beneficial curriculum and technology transfer base.

We were recently added to the mailing list for environmental documents and have completed our review of the Initial Study for CSUCI Master Plan, of February 12, 1998. We would like to provide the following comments to make you aware of our operations and related concerns regarding the proposed master plan:

A. a. The project site is within the study boundary of a Navy planning document known as Air Installation Compatibility Use Zone (AICUZ). For planning purposes, the document uses a daily noise average known as Community Noise Equivalent Level (CNEL). The AICUZ Study indicates that the project site is within one half mile of the 60 CNEL. The CNEL is only an average and is not descriptive of specific incidences of aircraft noise. In other words, the relatively quiet periods between loud passes of jet aircraft are averaged in. Daily noise occurrences may not be tolerable for some university activities, such as outdoor events and perhaps indoors in the absence of noise-attenuating building construction or when windows are open.

B. b. The Environmental Impact Report (EIR) must address aircraft noise issues in detail for the "university compatible" uses, such as the proposed public elementary school, housing and senior facilities. These uses may be less tolerable to noise and may require noise-attenuating construction for indoor areas. Related outdoor activities may not be tolerable to noise. Our staff can provide additional information for the EIR on our current and future operations.

C. c. A related concern is the growth inducement potential of the proposed activities. In the future, our operations could become affected by the spread of university-related businesses, housing, and facilities onto the agricultural area around CSUCI. This topic should have in-depth coverage and mitigation in the EIR.

D. We are glad to see the Initial Study discussion on university involvement in the ongoing watershed planning efforts of Calleguas Creek. On station, Mugu Lagoon is the receiving water of Calleguas Creek. The lagoon contains several thousand acres of wetlands and is home to several

CSUCI

5090
Ser 83J000E/A-1757
JUN 0 9 1998

D endangered species. NAWS Point Mugu participates in the Calleguas Creek Watershed Management Committee, which may be of assistance to you in the preparation of the EIR.

If you have any questions, our point of contact is Mr. James M. Danza, Environmental Planner, Code 83J000E, (805) 989-9747.

Sincerely,

STEPHEN D. BEAL
Captain, U.S. Navy
Commanding Officer

CSZICJ

Letter 5

Commentor: Stephen Beal, Department of the Navy, Pt. Mugu NAWS

Date: June 9, 1998

Responses:

A. The EIR states that the 60 dBA CNEL contour, a widely-accepted standard for measuring the noise environment and one used in the Navy's documents, is located 5000 feet to the northwest of the campus core area. Cumulative impacts to the noise environment considered the transfer of E-2 squadrons to the Pt. Mugu base. This would result in a revision of the 60 dBA CNEL contour to within about 2,400 feet northwest of the nearest existing and future building area. This is considered a less-than-significant impact.

As discussed in the EIR, these noise levels are expected to result in a nuisance effect, and do not exceed the threshold level used to qualify them as "significant."

B. The 60 dBA CNEL standard is considered the acceptable standard for all of the university compatible uses accommodated in the Master Plan, including residential, research and development office, and educational. No special noise-attenuating construction techniques are considered necessary under the cumulative noise impact assumptions.

C. The issue of growth-inducement is addressed in detail in the EIR in Section 6.0, *Long Term Impacts*. The analysis illustrates how regional growth and development projections within the foreseeable future can be accommodated within the existing Spheres of Influence of western Ventura County's cities. The agricultural lands adjacent to the proposed project site are zoned for agricultural use and are not within any city's Sphere of Influence. From a land use regulatory perspective, adjacent land areas are under the jurisdiction of Ventura County. Any urban development there could only be allowed by General Plan Amendments and Zone Changes by the Ventura County Board of Supervisors.

The Draft EIR includes three mitigation measures to further avoid the potential secondary growth impacts associated with the proposed project, which include further land use regulatory adjustments, a commitment to not use CSU property to extend support infrastructure to adjacent land areas, and a cooperation statement with any land conservancy organization devoted to agricultural land preservation or habitat restoration.

D. The commentor states an appreciation of the CSU's involvement in the Calleguas Creek Watershed Management Committee, which the Navy participates in.

DEPARTMENT OF THE NAVY
NAVAL AIR WEAPONS STATION
521 9TH STREET
POINT MUGU, CA 93042-5001

(6)

IN REPLY REFER TO:

5090
Ser 83J000E/A- 2188
July 21, 1998

Mr. George Dutra
Director, Facilities Planning
California State University, Channel Islands
P.O. Box 2862
Camarillo, CA 93011-2862

Dear Mr. Dutra:

The addition of a California State University campus in Ventura County will be an exciting event. Naval Air Weapons Station (NAWS), Point Mugu is looking forward to working with you and co-developing programs.

We recently forwarded comments to you on the Initial Study. We would like to take this opportunity to provide specific comments regarding the Draft Program Environmental Impact Report (DEIR) of June 4, 1998:

a. A review of aircraft noise impact on the university is needed, especially for sensitive uses, such as instruction rooms, elementary school, housing and senior facilities. These uses are less tolerable to noise and may require noise-attenuating construction for indoor areas. Daily noise occurrences may not be tolerable for some outdoor university activities.

A

Effect Land Use 4, aircraft fly-overs, states that because they are sporadic they are not significant. Section 5.8, noise, should more fully address the concerns raised above. Although facilities are outside of the 60 Community Noise Equivalent Level (CNEL), individual noise occurrences are commonly above 70 A-decibels.

The previous user, the state hospital, did not file complaints about noise. However, complaints are often related to the sensitivity of populations or their expectations for low noise levels, than to the noise level. For example we don't get noise complaints from those housed on station, but we have received them from communities 10 miles from the station where noise levels are considerably lower. By changing the use of the state property to a university, our concern is that the university and other proposed uses will be more sensitive than the previous user. Therefore, we continue to recommend that facilities be upgraded or built with noise attenuation.

B

b. The proposed Site Authority would have governmental powers to acquire and regulate land in the master plan area. Because this wide-ranging authority may have the ability to make decisions that may impact NAWS operations, we request that we participate in this authority. An added benefit is that NAWS participation may encourage the growth of technology transfer

5090
Ser 83J000E/A-2188
July 21, 1998

B | or other university and military programs.

C | c. Several design considerations are included in the project to reduce pollutants in surface and groundwater, which will help protect the aquatic environment of Calleguas Creek and Mugu Lagoon. Water quality monitoring is an important part of the project, however, the DEIR is not clear on the steps that would be taken if pollutant levels are unexpectantly high.

D | d. The potential for additional development near the university is an important issue. If possible, steps should be taken to reduce the potential for additional development, particularly on agricultural land. Wherever possible, new development should be restricted to the existing state property.

E | e. Section 5.9.1 discuss wastewater generation. Would the proposed campus require a need to increase the permitted discharge to Calleguas Creek? If so, impacts to Mugu Lagoon should be addressed.

F | f. Section 5.10 states that the Las Posas Road terminus is adjacent to Mugu State Park. The terminus of Las Posas Road is at NAWS Point Mugu and is the most heavily used access to the station. The impact on the intersection of Las Posas and State Hwy 1 does not appear to be included in the DEIR. What is the impact, especially during the morning and afternoon commute?

The issues we have raised are important, however, we do not see any of them to be insuperable. Our staff is ready to assist you with any questions you may have. Our point of contact is Mr. James M. Danza, Environmental Planner, Code 83J000E, (805) 989-9747.

Sincerely,

STEPHEN D. BEAL
Captain, U.S. Navy
Commanding Officer

CSUCI

Letter 6

Commentor: Stephen Beal, Department of the Navy, Pt. Mugu NAWS

Date: July 21, 1998

Responses:

A. The EIR discusses aircraft overflight noise issue as an existing environmental condition and as a cumulative impact issue. Please see Section 5.8.1.c., *Existing Noise Sources*, and 5.8.2.c., *Cumulative Impacts*. The noise levels are determined to cause a nuisance impact, but do not exceed the threshold of significance that would result in a significant impact at the proposed location of noise sensitive uses.

The operation of aircraft is an inherently noisy activity, and as the commentor acknowledges, it is an operation that may generate complaints from some members of the community. Nevertheless, using the Navy's documents and analyses as a basis for this EIR, significant noise impacts to uses within the Master Plan area are not anticipated to occur. No special noise-attenuating construction techniques are considered necessary.

B. The request to be considered for inclusion as a member of the Site Authority is hereby noted. Such a relationship with the project would require special State legislative action and would result in a change to the currently proposed makeup of the Authority. Such a change can only be considered within the current State legislation that would form the Site Authority and would not effect the environmental impacts of the proposed project.

C. The implementation of the Mitigation Measures that address surface water runoff are included in Section 5.6, *Hydrology and Water Quality*. These are considered to address any potential increase in pollutant discharge to Calleguas Creek drainage systems. Monitoring of these measures will be established as part of the Mitigation Monitoring and Reporting Plan, which will be prepared for consideration by the California State University Board of Trustees at the time of consideration of the project. Monitoring of surface water quality in Calleguas Creek is an ongoing responsibility of the Regional Water Quality Control Board. If a violation of water quality standards were to occur, the Regional Water Quality Control Board has the regulatory authority to implement corrective actions.

D. The issue of growth inducement and development pressure is discussed in Section 6.0, *Long Term Impacts*. Though existing land use regulatory mechanisms would preclude any development on adjacent lands without a special action by the County of Ventura, additional mitigation measures have been included to further address the potential for development to occur. Please see Response 5C above.

E. Please review Section 5.9.2.b., *Project Impacts and Mitigation Measures*. The analysis of wastewater outflow shows that wastewater generated would be processed by the Camrosa Water District, which has adequate capacity to treat the project-generated

wastewater effluent. Though additional treatment allocation may be needed, Camrosa officials state that their agreement can be modified. Camrosa would address any discharge increase that they may require at such a time that an increased discharge is necessary. In that event, Camrosa would need to meet the discharge requirements of its National Pollution Discharge Elimination System (NPDES) permit imposed by the Regional Water Quality Control Board, which would be intended to prevent impacts to Mugu Lagoon.

F. Based on the demographics of students expected at the campus and the projected student/staff travel routes, its was determined that the project would not add significant amounts of peak hour traffic to the Las Posas Road/Route 1 interchange. A detailed analysis of this location was therefore not included in the DEIR. The Final EIR text will be modified to correct the textual reference to this location.

City Of Camarillo

601 Carmen Drive • P.O. Box 248 • Camarillo, CA 93011-0248

Department of Planning and
Community Development
(805) 388-5360
Fax (805) 388-5388

7

July 17, 1998

Mr. George Dutra, Director
Facilities Planning
California State University, Channel Islands
P. O. Box 2862
Camarillo, CA 93011-2862

Subject: Draft EIR for Campus Master Plan

The City of Camarillo is in receipt of the Draft Environmental Impact Report (DEIR) for the proposed California State University, Channel Islands Campus Master Plan. We appreciate the opportunity to provide continuing input into the environmental review process. After reviewing the draft DEIR the city has the following comments:

Traffic

A

1. The trip assignment for the traffic analysis assumes that most of the university traffic destined for the north U.S. 101 Freeway will use Las Posas Road to access the freeway. However, due to a scheduled Lewis Road/U.S. 101 interchange improvement that will add a new set of ramps, Lewis Road will provide a more direct route than Las Posas Road for traffic travelling between the university and the north U.S. 101 Freeway. The traffic analysis should be modified to assign the traffic to Lewis Road rather than Las Posas Road.

B

2. The EIR should be modified to more accurately account for how university traffic will impact the Las Posas Road interchange. In the EIR, future northbound traffic on Las Posas Road approaching the U.S. 101 southbound ramp intersection has been loaded equally among all of the approach lanes. However, a disproportionately higher amount of the traffic would use the number three northbound lane because it will be accessing the U.S. 101 northbound onramp. Due to this disproportion, the intersection would operate at LOS F. The EIR

CSUCI

should account for the disproportionate lane loading. It should be noted that when traffic is reassigned to Lewis Road as outlined in comment number 1 above, the impacts to the Las Posas Road interchange may diminish to less than significant levels.

Mr. Tom Fox, the City Traffic Engineer, would be available to review the items above and to assist in the revisions to the EIR. Tom may be contacted at (805) 388-5355.

Respectfully,

Robert W Burnow.

for Matthew A. Boden, Director
Planning and Community Development

MAB:s (d:\myd-wd\csucieir)

cc: J. William Little, City Manager
Tom Fox, City Traffic Engineer

CSUCI

Letter 7

Commentor: Matthew Boden, City of Camarillo

Date: July 17, 1998

Responses:

A. A supplemental analysis was completed for the Lewis Road and Las Posas Road corridors assuming implementation of the Lewis Road/U.S. Highway 101 interchange improvements. The trip assignments for the University were modified based on this improvement project to illustrate the effect of this alternative roadway system. Please see Section C of this report for the supplemental text.

B. As shown on the City's ICU worksheets for buildout conditions, the critical volume on the northbound approach at the Las Posas Road/U.S. Highway 101 Southbound Ramps intersection is the northbound through lane which "traps" onto the southbound on-ramp. The CSUCI project would add its traffic to the through lanes which cross the bridge, and thus would not be critical to the ICU calculation.

Under the revised trip assignment scenario resulting from the Lewis Road/U.S. Highway 101 interchange improvement, the project would be expected to add approximately 94 northbound through trips to the Las Posas Road intersection. Even if all of these trips are loaded into a single lane, the impacts would be less than significant, as the northbound through lane which "traps" onto the southbound on-ramp would remain critical.

CAMROSA Water District

(8)

July 20, 1998
FER-98-276

Mr. George Dutra
California State University
PO Box 2862
Camarillo, Ca 93011-2862

RE: COMMENTS ON THE DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT FOR CALIFORNIA STATE UNIVERSITY, CHANNEL ISLANDS CAMPUS MASTER PLAN

Dear Mr. Dutra:

Thank you for the opportunity to comment on the Draft Program EIR for the CSUCI Master Plan. Camrosa Water District supports the CSUCI's goals of establishing a four-year university on the Oxnard Plain and we look forward to working with you in realizing those goals. The comments which follow are intended to be helpful in nature and, hopefully, will serve to strengthen your EIR.

Page 5.6-12 Point of Discharge: The EIR states that "irrigation water for the golf course would be reclaimed water from Camrosa wastewater treatment facility. This water is currently being discharged directly to Calleguas Creek south of the Lewis Road Bridge."

A Camrosa now reclaims much of its effluent from the Camrosa Water Reclamation Facility. The water is pumped to storage ponds north of the main entrance to the CSUCI campus and is currently marketed to area growers. Discharges of reclaimed water do occur during wet periods when growers do not irrigate for an extended period of time. During those times, reclaimed water is discharged into Conejo Creek in the vicinity of the storage ponds. There is no discharge point south of the Lewis Road Bridge.

B Camrosa strongly supports the use of reclaimed water wherever possible. While no facilities currently exist to deliver reclaimed water to the campus, construction of such facilities should be a top priority in designing the ultimate buildout. Sufficient reclaimed water will be available to serve the campus, both from the reclamation process at the WRF and from water reclaimed from Conejo Creek

While irrigation water can be obtained from Camrosa for golf course irrigation, no agreement currently exists to supply such water to the new campus. Camrosa is currently negotiating long term water service and wastewater service agreements with the staff of CSUCI.

7385 Santa Rosa Road • Camarillo, CA 93012-9284
Phone: (805) 482-4677 • FAX: (805) 987-4797
Website: www.camrosa.com

CSUCI

Page 3-19 Secondary Access Road: The discussion indicates that "A secondary access road would be constructed during later phases to tie into the new parking structure to be located to the northwest of the main campus. This extension of Santa Barbara Avenue, which presently is along the north end of the North Complex, would be aligned adjacent to Long Grade Canyon Creek channel north of Round Mountain and north of the Camrosa Wastewater Treatment Facility (Figure 3-5)."

C

Camrosa's Water Reclamation Facility is designed to accommodate future expansion to meet anticipated growth within the District. The proposed alignment of the road, adjacent to Long Grade Canyon Creek channel, will likely create problems in implementing future expansion plans. The District requests that CSUCI provide the necessary flexibility in its planning and EIR process to accommodate placement of the secondary access further to the northeast. The attached drawing is a conceptual representation of our future land requirements to accommodate expansion and depicts an alternate placement of the access road required by the campus. Camrosa staff would be most happy to discuss this option further with you and your staff.

Appendix A - Page 14 Infrastructure: The Environmental Checklist Form, when addressing the adequacy of existing infrastructure and water entitlements, indicates that this project will have a less than significant impact. The discussion indicates that "new laterals would need to be developed in conjunction with new development, but demand would be accommodated within the existing system." The discussion further states "...water service from Camrosa Water District to the site is adequate to meet expected needs."

D

CSUCI is currently served by Camrosa through a 12-inch line which has limited flow capacity to serve the campus. Camrosa's existing water facilities in the vicinity of CSUCI have reached their capacity in meeting existing demands which included the former Camarillo State Hospital. It will likely be necessary to expand storage capacity on campus by full buildout and may be necessary to enlarge the water service line serving the campus depending upon the water needs of new development. Any new demands will require facility improvements, special operational management, and/or mitigation of potable water by reclaimed water. To the extent that the University can reduce its historical demands, some surplus capacity can be created to serve new demands. In order to evaluate the impact of the master plan build-out on the existing water service infrastructure, a basic analysis of water demands in Section 5.9 will be necessary. Included in the discussion should be projected flow rates required at full buildout, total projected monthly demand by volume, a comparison of historical volumes used and projected volumes required and a discussion of how potable demands may be offset by using reclaimed water for irrigation needs. The information you recently provided to us may address many of these concerns. We expect to work with you as more specific information is needed.

E

Immediately northeast of CSUCI, the proposed County of Ventura Amphitheater and Golf Course project faces the same limitations in potable water capacity. The County's project is outside Camrosa's District boundaries, but the County has indicated that it will request annexation to Camrosa to serve the project. At the time of this letter, a challenge to the EIR for the County's project is under a judge's deliberation. If the County project proceeds, your existing and projected water demands will be used to determine the improvements necessary to serve the County Amphitheater and Golf Course project.

CSUCI

Appendix A - Page 14 Water Supply: The discussion on page 14 goes on to say "water supply is considered adequate."

The sources of Camrosa's water are: imported water, water purchased from Calleguas Municipal Water District; local groundwater from the Tierra Rejada Basin, Santa Rosa Basin, and the Pleasant Valley Basin; and reclaimed water from the City of Thousand Oaks Wastewater Treatment Plant and Camrosa's own Reclamation Facility. The District also has established a groundwater management plan for the Santa Rosa Basin under the authority of the Groundwater Management Act of the California Water Code (Sections 10750 et seq.)

F

Although Camrosa operates its facilities in a manner intended to optimize the use of local water resources; general increases in potable water demands, whether resulting from the growth within the community or changes in water use practices, must be met by additional imported water purchases from Calleguas Municipal Water District. Therefore, increases in potable water demands within the Camrosa Service area do not adversely impact local groundwater resources. All increases in potable water demands directly impact the imported water system and imported water resources. While there is no impact upon local resources, the impact upon the State Water System supplies are a concern since SWP supplies are not unlimited. In times of drought, both the Metropolitan Water District and Calleguas Municipal Water District have imposed cutbacks in the quantities of water available for retail distribution.

An opportunity exists to mitigate the projected demand on potable water by maximizing the use of reclaimed water. As stated previously, the analysis in Section 5.9 should contain a discussion of water demands at full build-out, and the methods CSUCI would propose to mitigate any increased demands or reduce historical demand through the use of reclaimed water. The conversion of existing irrigation systems to reclaimed water should be included as part of the campus rehabilitation plan. Using reclaimed water in new construction should be a priority consideration during the design phases of the buildout.

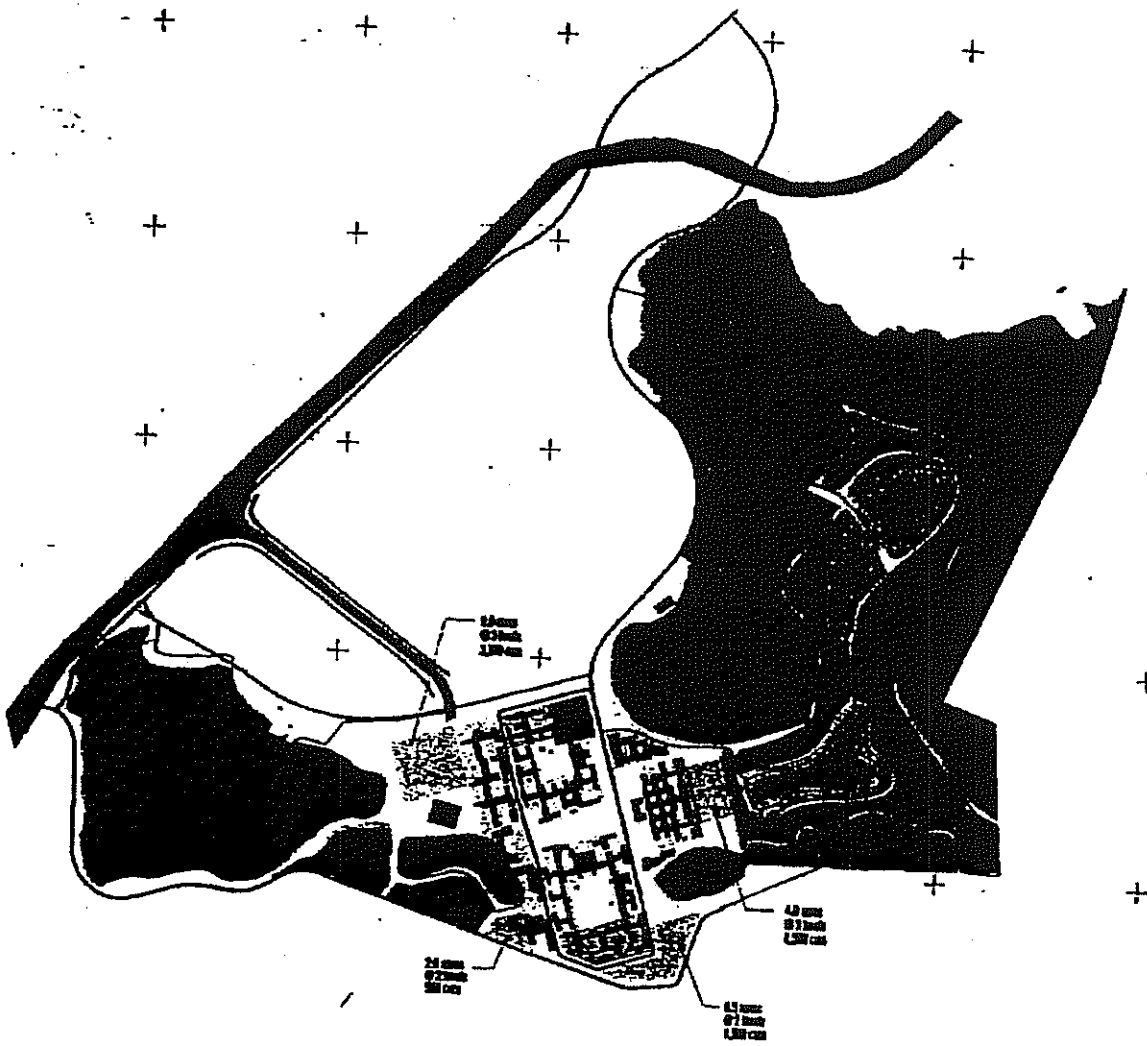
Again, thank you for the opportunity to comment on your EIR. We look forward to working with you in establishing the CSUCI campus and to providing water and wastewater services to you. If you have any questions about the comments we have made, or if you would like further clarification, we would be happy to meet with you to discuss them further.

Sincerely

Richard H. Hajas
General Manager

RHH:pe
Enclosure

CSUCI



CAMPUS MASTER PLAN

SITE PLAN

East and West Campus

Developable Area = 160 acres

Campus Core = 1,842,900 gsf

California State University
Channel Islands

Master Plan

Camarillo Hospital Re-use

Hardy Holzman Pfeiffer Associates

Figure 3-6

CSUCI

Letter 8

Commentor: Richard Hajas, Camrosa Water District

Date: July 20, 1998

Responses:

A. The Final EIR will be corrected to address this factual error. It does not affect the analysis of any significant impact.

B. The desire by the commentor that the CSU consider the design for and use of reclaimed water for irrigation purposes is noted. Please note that the CSU has contemplated the use of reclaimed water for irrigation, as indicated in Section 3.7.5, *Public Utilities and Infrastructure*. At such a time that reclaimed water is brought onto the campus, the distribution facilities will be constructed, but provision for such distribution lines is not a significant constraint to the planning or development of the campus for its intended uses. According to the Initial Study prepared in February 1998, which relied on a utility infrastructure inventory (Psomas and Associate, 1977), water supplies are considered to be adequate. In addition, though the site is currently served by Camrosa Water District, the State retains rights to groundwater to serve onsite needs. Therefore, supply impacts are expected to be less than significant.

C. The timing of the demand for the Santa Barbara Avenue extension suggests that design and alignment studies will not be necessary for several years. Camrosa Water District officials, other neighboring property owners, and Ventura County Public Works, will be involved in the programming and planning stages of the roadway, providing an opportunity for meeting multiple objectives of all parties. The potential need to realign this conceptual roadway further to the northeast to meet the expansion needs of Camrosa is noted for consideration by the CSU and potentially the Site Authority at such time that the roadway is to be engineered.

D. Please see the response to comment 8B above. An existing utility inventory states that water supply systems existing on site are adequate to serve the proposed project now and in the immediate future. If an expansion becomes warranted as the campus approaches full buildout, a subsequent environmental review by Camrosa, the CSU or the Site Authority, or other concerned public agency (e.g. the County of Ventura in relationship to uses on adjacent unincorporated land) would be prepared at such a time. It is also noted that the Initial Study (Appendix A) and a Notice of Preparation of an EIR was circulated to the Camrosa Water District in February 1998 and no comments regarding this issue were raised in response to that notice.

E. The commentor has raised an issue related to a neighboring development proposal that was the subject of an independent environmental review. The Camrosa Water District would need to take a separate annexation action to serve the project in question, which does not involve the Campus Master Plan area.

F. The CSU supports the use of reclaimed water to offset additional demand for potable water. Please review response to comment 8B above. As a program EIR, the analysis has analyzed the buildout and development of a Master Plan. At such time that detailed infrastructure plans are drawn up to serve new construction areas within the Master Plan area, Camrosa Water District officials will be consulted further and detailed design features will be jointly developed. If significant new infrastructure for capacity or storage are in fact needed that have not been anticipated in this document, these would be subject to additional environmental review prior to their approval.

City of Thousand Oaks

(9)

COMMUNITY DEVELOPMENT DEPARTMENT
PHILIP E. GATCH, DIRECTOR

BUILDING DIVISION (805) 449-2500
PLANNING DIVISION (805) 449-2323

July 16, 1998

Mr. George Dutra
Director of Facilities Planning
California State University, Channel Islands
Post Office Box 2862
Camarillo, Ca. 93011-2862

Dear Mr. Dutra:

Thank you for the opportunity to comment on the Program EIR for the Campus Master Plan. While we applaud the cultural enhancement which will result from the construction of the university and the reuse of an existing major state asset, we do have some concerns relative to the issues addressed below.

Air Quality, Section 5.2 pp 5.2-7 - 5.2-9, Operational Emissions

A As noted, the operational emissions of ozone precursors associated with the project will exceed the Ventura County Air Pollution Control District's 25 pound per day (ppd) threshold of significance by 204.7 ppd of reactive organic compounds (ROC) and 229.3 ppd of nitrogen oxides. This will have a significant cumulative and regional adverse impact on the County's air quality. Since the predominant daytime wind direction is from the west, there is a possibility that pollutants such as ozone and PM10 may be transported by prevailing winds into the Conejo Valley. The EIR should evaluate whether the proposal will result in a deterioration of the air quality in the Conejo Valley.

B One of the mitigation measures which can be used by projects which exceed the APCD significance thresholds is a monetary contribution to an off-site TDM program. This method is utilized by Ventura County as well as all of the cities in the county. An off-site TDM contribution should be calculated for this project pursuant to the Ventura County Guidelines for the Preparation of Air Quality Impact Analyses.

Biological Resources, Section 5.3 pp. 5.3-13 - 5.3-15

C The City of Thousand Oaks is concerned about the regional biological diversity. Many examples of sensitive species are protected within the City's extensive Open Space System. We applaud the University's plan to manage open space areas as a biological preserve and encourage you to do your utmost to minimize impacts to sensitive biological resources.

2100 Thousand Oaks Boulevard • Thousand Oaks, California 91362-2903 • Building FAX (805) 449-2575 • Planning FAX (805) 449-2350

CSUCI

C. A number of the bird species listed in Appendix C, such as black-backed woodpecker, yellow-billed magpie and verdin seem to be out of range and not at all typical of expected fauna in this part of Ventura County. What is the basis for their inclusion?

Public Services, Section 5.9, Impact PS-2, pp 5.9-4 - 5.9-6

Comments in regard to Solid Waste Issues are discussed in the attached memo from Gram Watts, Environmental Programs Analyst.

D

Transportation/Traffic, Section 5.10

Comments in regard to Traffic Issues are discussed in the attached memo from Beth Baden of the City's Transportation Division.

Thank you for allowing us the opportunity of commenting on this important project. Should you have any questions, don't hesitate to call me at (805) 449-2326.

Sincerely,

Richard A. Burgess
Associate Planner

cc: MaryJane Lazz
Phil Gatch
Don Nelson
Beth Baden
Grahame Watts

C:cdd:410-20/rab/csuci.com

M E M O R A N D U M

City of Thousand Oaks • Thousand Oaks, California

Public Works Department

To: Rick Burgess, Community Development

From: Grahame Watts, Public Works Department

Date: July 16, 1998

Subject: **Cal. State Channel Islands Master Plan - Comments**

Thank you for forwarding the Summary Section of the EIR for the proposed Cal State Channel Island Campus in Camarillo. I have reviewed the document and I am offering the following comments:

E Section PS-2 refers to campus solid waste impacts. I would suggest more detail be added to the section and include language that requires the University to designate a position that includes the responsibilities of implementing a campus recycling program. I would also suggest that a time frame (30 days after opening) for implementing an on campus recycling program be set. The University should be required to submit a Recycling Plan prior to opening that will identify all the details of how on site waste will be managed. The document makes no reference to hazardous waste management or construction and demolition practices.

F In addition to managing greenwaste on site, the University should be asked to consider the inclusion of a community garden that could be used by faculty, students and staff for gardening needs, educational purposes and for small scale composting. This item should be spelled out and as part of the organics recycling program (PS-2e).

Please contact me if you have any additional questions.

Grahame Watts
Environmental Programs Analyst

CSUCI

TO: Rick Burgess, Associate Planner

FROM: Beth J. Baden, Senior Civil Engineer

DATE: July 16, 1998

SUBJECT: Traffic Review of Program EIR for CSU, Channel Islands Master Plan

G The traffic study does not adequately address the impact of the project's traffic on Potrero Road. Also, the study does not identify how the project traffic will disperse to other roadways within the City of Thousand Oaks as that traffic enters the city at the top of Long Grade Canyon. The traffic analysis should be expanded to identify these impacts and introduce mitigation as needed for these issues.

H The General Plan Buildout traffic volume for Potrero Road east of the project site is in error. The buildout traffic volume was calculated at 4260 ADT in EIR 301, which was prepared for the Dos Vientos Ranch, a residential development under construction at the top of Long Grade Canyon in the City of Thousand Oaks. Your Figure 5.10-7 shows this section of road with a volume of 2800 ADT at General Plan Buildout. That figure should be corrected, as should Figure 5.10-9 for General Plan Buildout + CSUCI, which should show Potrero Road with 6060 ADT (4260 + 1800 for CSU traffic) for Potrero Road east of the project site for buildout + project.

I The increase in traffic from the CSU traffic on Potrero Road should be corrected and discussed in further detail in the EIR.

J Potrero Road east of the site is a two-lane road that does not meet Ventura County Road Standards. It has steep grades, substandard curves and is substandard in width. The safety of this substandard road as it currently exists is questionable, as is the ability of this road to accommodate a significant increase in traffic from the proposed project. The EIR should be expanded to document these conditions and to discuss the impact of project traffic that will use Potrero Road for daily project use and special events.

K Should Potrero Road require improvements to accommodate project traffic, the study should also discuss growth-inducing impacts that those improvements could have on the City of Thousand Oaks.

Letter 9

Commentor: Richard Burgess, City of Thousand Oaks

Date: July 16, 1998

Responses:

A. The commentor has restated information included in the EIR regarding air quality impacts, which have been described as significant and unavoidable. Since the Conejo Valley is part of the Ventura County Air Basin, the EIR has implicitly stated that air quality there will be adversely affected.

B. The California State University is not planning to pay mitigation fees suggested by the commentor for the reasons discussed in Section 2.3.3 of the Draft EIR. Nor is the CSU subject to any fees that may be imposed by the City of Thousand Oaks, in whose jurisdiction the CSU has no development plans. However, the proposed project is developing and committing to a range of transportation demand management strategies and other air pollution reduction strategies that should mitigate impacts directly and for a longer term as compared to the three-year buydown fee program associated with the off-site TDM program. The Master Plan also includes a range of land uses that could accommodate the needs of students, faculty, and staff on campus, thereby further reducing the potential for air pollutant emissions. These uses include not only employment centers for research and development operations, but housing and ancillary retail uses to serve the campus and residential community, as stated in Section 3.7 of the EIR. The campus is also intended to serve 3,250 FTES at campus buildout through distance learning centers, thereby eliminating 7,735 potential trips and consequential air pollutants. Please also review the mitigation measures included in Section 5.2, *Air Quality*.

C. These species were inadvertently included as a result of a spreadsheet error and will be deleted from the Appendix table. The Northern Flicker is added in place of the Black-backed Woodpecker, the "observed" in the "urban" column for the Verdin" is moved down one row to the Bushtit row, and the "observed" in the "urban" column for the Yellow-billed Magpie is moved up one row to the Scrub Jay row. The analysis of significant project effects and the nature of mitigation measures is not affected by these changes.

D. The commentor states that comments by two other City of Thousand Oaks officials follow. These are addressed below.

E. The commentor suggests that more detail be added to the EIR section without including specifics of what deficiencies exist in the section; no further response is possible. The recommendation that an administrative position within the CSU with responsibility for solid waste is noted for the decision-makers, but is not viewed as a necessary mitigation measure. CSU campuses have historically developed recycling plans and such is required by Mitigation Measure PS-2(a). Please also see Mitigation Measures PS-2(b)

through (e). The details of timing and responsibilities for these mitigation measures will be developed as part of the Mitigation Monitoring and Reporting Program, which will be prepared for consideration by the Board of Trustees at the time of action on the proposed project. Hazardous waste management at each CSU campus is handled by an administrative person directly assigned responsibility for this issue. Construction and demolition practices are controlled through the standard construction contract that CSU uses; please see also Mitigation Measure PS-2(d).

F. While a community garden may be an added attraction for the campus, it does not serve to reduce either solid waste or green waste and so is not feasible as a mitigation measure. Your suggestion is herein forwarded to the University planners for their future consideration. The establishment of a community garden at the site is not precluded by the current plans (it could be located anywhere in the recreation/open space lands) and several campuses in the CSU system do have community gardens.

G. The impacts of the project to Potrero Road were addressed in the DEIR and determined to be less than significant. Phase 1 would add 724 ADT, while buildout of CSUCI would add 1,800 ADT to this roadway. These traffic additions were determined to be insignificant. Given this level of traffic addition, no further analysis of project impacts within the City of Thousand Oaks is required. It is also noted that traffic on surface streets within Thousand Oaks would not increase as a result of CSUCI. Surface street volumes in Thousand Oaks are directly related to development within Thousand Oaks (i.e. residents of Thousand Oaks will generate a fixed amount of traffic with or without CSUCI).

H. The 2,800 ADT figure on Potrero Road represents the forecast volume of traffic adjacent to the project site at Lewis Road. This volume is directly affected by development in the study-area adjacent to the project site. The 4,260 ADT suggested by the commentor may be correct for the segment of Potrero Road in Thousand Oaks, however this is not the segment which is analyzed in the EIR.

I. See response to Comments G & H above.

J. Potrero Road has the physical capacity to accommodate the additional traffic generated by CSUCI. Although CSUCI would add traffic to Potrero Road and thereby have the potential to increase the number of accidents, the accident rate would not be expected to increase. The accident rate, which is determined by the number of accidents per million vehicles miles traveled, is related to the roadway design features. Improvements necessary to correct any safety problems on Potrero Road are required with or without the proposed CSUCI project.

K. See response to Comments G through J above.

RESOURCE MANAGEMENT AGENCY
county of ventura

(10)
THOMAS BERG
Agency Director

July 20, 1998

George P. Dutra
Director, Facilities Planning
California State University, Channel Islands
1878 South Lewis Road
Camarillo, CA 93011-2862

RE: CSU-CI CAMPUS MASTER PLAN DRAFT ENVIRONMENTAL IMPACT REPORT

Dear George:

A | Attached please find County agency comments regarding the Draft EIR for the CSU-CI Campus Master Plan. Overall, the Draft EIR does a good job of evaluating project impacts. The attached communications identify technical corrections and offer suggestions for improvements which we hope will be incorporated into the Final EIR. Any EIR issue areas requiring further amplification or clarification can be addressed in the response to comments.

As you know, the County has on-going concerns related to the mitigation of off-site impacts. We expect that this and any other County concerns will be adequately addressed as we pursue the preparation of a Mitigation Monitoring Program, Specific Plan and Development Agreement. We look forward to working closely with you to develop these and any other tools required for the implementation of the new California State University, Channel Islands.

Sincerely,

Thomas Berg

Thomas Berg, Director
Resource Management Agency

Attachments

Dutra:DH

RESOURCE MANAGEMENT AGENCY
county of ventura

Environmental Health Division
Donald W. Koepp
Director

DATE: July 10, 1998

TO: Dennis Hawkins

FROM: Melinda Talent MT

SUBJECT: **DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR CALIFORNIA STATE UNIVERSITY, CHANNEL ISLANDS**

The Environmental Health Division (EHD) reviewed the subject DEIR and provides the following comments:

B 1. EHD did not receive the Notice of Preparation for the subject DEIR, or, have the opportunity to respond to an initial study for the project. In the future, please include EHD in the distribution list for all Notices of Preparation for EIRs.

C 2. The proposed project is located on a property which the California Environmental Protection Agency Department of Toxics Substances Control has identified on the Calsites list for an uncontrolled release of a hazardous substance(s). According to a summary report, the site has been referred to the California Water Quality Control Board for further action. There was no discussion in the DEIR regarding the site or status from the Regional Water Quality Control Board.

D 3. EHD records indicate that there is a Leaking Underground Fuel Tank (LUFT) site on the property for which closure has not yet been obtained. According to EHD records, there was groundwater and soils contamination at the site. In addition, there are other underground tanks located on the site which are still in place. The final EIR should address the status of the LUFT site and the future use or removal of the existing tanks.

CSUCI

E

4. On page 5.9-5 under Public Services, Mitigation Measure PS-2(e) recommends the use of greenwaste mulching and small-scale composting facility on-site. There are potential human health risks associated with bioaerosols and composting operations. At this time, the public health significance of bioaerosols from composting is unknown. Since the on-site composting is part of the proposed project mitigation measure, the final EIR should include a discussion on exposure to bioaerosols from the composting facility to nearby sensitive receptors at the proposed daycare center and eldercare facilities.

F

5. The project applicant should be aware that Title 14, California Code of Regulations (CCR), imposes permitting requirements and/or state minimum standards pertaining to specified greenwaste chipping and grinding and composting operations and facilities.

G

6. EHD records indicate that the project is located on or near a closed, illegal or abandoned solid waste disposal site. If during construction evidence of a waste disposal site is encountered, the work shall cease and EHD as the Local Enforcement Agency should be notified.

H

7. On-site retention in the form of detention basins, drainage swales and other methods, are proposed as mitigation measures for water drainage on the property. These drainage systems may provide an area for mosquito breeding. The final EIR should include a discussion on the design and maintenance of the systems in order to prevent mosquito breeding sources and protect sensitive populations at the proposed daycare and eldercare facilities from exposure to vector borne diseases.

If you have any questions please contact me at 654-2811.

COUNTY OF VENTURA

RESOURCE MANAGEMENT AGENCY
PLANNING DIVISION

MEMORANDUM

DATE: July 16, 1998

TO: Thomas Berg, Director
Resource Management Agency

FROM: Dennis Hawkins DH
Planning Division

SUBJECT: CSU-CI CAMPUS MASTER PLAN DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)

The Planning Division has reviewed the above environmental document and offers the following comments:

General Comments

I | In general, the EIR appears to do a fairly good job of describing the environmental impacts of the proposed CSU project. Our main criticism of the EIR are that the project description for the non-university land uses is still somewhat nebulous and the EIR identified mitigation measures, particularly for off-site traffic impacts, are not detailed enough to assure their effectiveness or feasibility. At some point these issues will need to be fully addressed by means of a Specific Plan, Development Agreement and Mitigation Monitoring Program.

Introduction

J | Page 1-1, 2nd paragraph - The original CSU site was not located in Somis. It was located in the western part of the Las Posas Valley, between Price Road and Aggen Road, south of La Loma Avenue.

K | Page 1-6, 1st paragraph - The EIR indicates that Ventura County may become a lead agency involved in the permitting and implementation of various off-site improvements to infrastructure (such as road improvements, traffic signals, etc.) that may be associated with

K

campus growth and that the Flood Control District may be a responsible agency with respect to any improvements to Long Valley Grade channel. The EIR should be revised to indicate that Ventura County will also be a lead agency with respect to approval of the non-University land uses (golf course, senior and/or military housing, research and development offices and other revenue-generating land uses which are not directly related to the CSU academic program. Additionally, Ventura County will need to amend its General Plan to accommodate these non-University land uses and will need to rezone the site, adopt a Specific Plan and Development Agreement and amend the County General Plan Regional Road Network and amend the County's Traffic Impact Mitigation Fee Ordinance.

L

Page 2-3, Section 2.1.3, 2nd paragraph - The EIR never explains what an academic enhancement center is. Earlier discussions with CSU staff indicate that this might entail overnight lodgings and meeting rooms for symposiums, seminars and private sector training sessions. The EIR should describe the purpose, size and capacity of this facility. The size of this facility may affect land use compatibility and traffic impacts.

The residential component of the project is variously described as faculty/staff housing, senior housing, military housing or some combination thereof. The EIR should consider that senior oriented housing would have different effects than military or faculty/staff family oriented housing. Senior housing may require greater emphasis on public transportation and medical care, etc., while family oriented housing may have greater impacts on schools and parks etc.

M

Page 2-27 to 2-29, Section 2.3.3, Mitigation Responsibility - The EIR discusses mitigation responsibility and indicates that CSU cannot mitigate off-site impacts of the project. This appears to be contrary to the spirit and requirements of the California Environmental Quality Act. We know of no other State agency that exempts itself from mitigating its off-site impacts. We suggest that the section be revised to substitute language that says - given the magnitude of the off-site traffic improvements required for this project, and the scarcity of education dollars, it may be financially infeasible for CSU to participate in mitigation of these impacts, unless the California State University, Channel Islands Site Authority legislation is enacted.

The issue of mitigation responsibility may become mute if SB 1923 is enacted by the Legislature and signed by the Governor, as expected. However, even if the legislation is approved creating a Site Authority, the EIR is not clear to what extent the Site Authority will in fact contribute to off-site mitigation efforts. This issue will ultimately be settled by a Development Agreement signed by the County and the CSU Site Authority. However, we suggest that in order to make the EIR mitigation measures "real" - the EIR should embody

the concept that the Site Authority will pay traffic fees equivalent to the University's "fair share" impact on the Regional Road system in the vicinity of the project.

Project Description

N | Page 3-7, Section 3.6.2, Additional Permits and Approvals - The EIR should also indicate that the County must amend its General Plan to eliminate inconsistencies with existing land use policies for State or Federal Facilities and the Urban Centers policy. Additionally, the County must amend the General Plan Regional Road Network to accommodate the widening of Cawelti Road and Las Posas Road as recommended in the Traffic section of the EIR. Additionally, the County must approve a Specific Plan, Development Agreement, zone change, and amend the County's Traffic Mitigation Fee Ordinance.

O | Page 3-8, 1st paragraph, page 3-20, 1st and 4th paragraphs - The EIR references Santa Barbara Avenue, Rincon Drive, Camarillo Drive, Santa Paula Avenue and Ventura Street. A map should be provided showing the location of these roads.

Cultural Resources

P | Page 5.4-7, Table 5.4-1 - A map should be provided to show the location of the referenced buildings. It may be useful to include photographs of the buildings to be removed to support the EIR conclusions regarding significance.

Q | Page 5.4-8, Paragraph C-3(b) - The EIR indicates that Employee Housing Home 1 "should be considered" for reuse as part of a community center or possibly the academic enhancement center. This is a good concept, but the language "should be considered" needs to be reworded as this is not an effective mitigation measure. We suggest the language be revised to "shall be required". If there is a question regarding the feasibility of the measure, the feasibility issue should be explored.

Noise

R | Page 5.8-2, paragraph N-2(a) - The EIR recommends that the University not approve the Camarillo Regional Park amphitheater Noise Abatement Plan (NAP) unless certain noise mitigation measures are included in the NAP. The University does not have approval authority over the NAP. The CSU staff and consultant have reviewed the draft NAP and their comments will be considered prior to approval of the final NAP.

S | Page 5.8-12, paragraph N-3 - The EIR recommends use of rubberized asphalt paving materials be used for any re-paving of roads effected by project and cumulative traffic. This

measure is ineffective because the EIR fails to identify where this measure should be applied, who will be responsible for this measure and how will it be paid for. We suggest that the EIR require this measure to be implemented only adjacent to noise sensitive land uses and that the cost of this improvement be funded by the Site Authority (at least CSU's prorata share). The cost of this measure could also be shared by the Camarillo amphitheater project if it were made a condition of the Traffic Management Plan which CSU has approval authority over.

Transportation/Traffic

T

Page 5.10-8, 3rd paragraph in Section b - The EIR does not propose any effective mitigation for traffic impacts. The EIR merely provides a wish list of traffic improvements that would need to be constructed. The EIR indicates that funding of traffic improvements is discussed in Section 2.2.3 (Mitigation Responsibility). However, this section basically disclaims any responsibility for funding of transportation mitigation , except possibly some unspecified contribution by the proposed Site Authority. We suggest that additional detail be provided to address funding of these improvements. This should include an indication that the Site Authority will take responsibility for the CSU's fair share of traffic improvements, while the balance would be paid for through an increase in the County's Traffic Impact Mitigation Fee Ordinance and through other funding sources, including $4 million in TEA-21 funds which is budgeted for the improvement of Lewis Road in the vicinity.

U

Page 5.10-28, last paragraph, continuing to page 5.10-29 - The EIR critiques a draft Traffic Management Plan (TMP) prepared for the Camarillo Regional Park amphitheater project. The draft TMP was rejected by the County Transportation Department. Furthermore, the conditions of the permit require that the TMP be approved not only by the County, but also by the City of Camarillo and the University. Further, since the State owns Camarillo Drive, the State can dictate whatever terms it desires for the use of this facility or may choose not to allow the expanded access required for the proposed amphitheater.

Berg:DH

CSUCJ

county of ventura

Peter S. Pedro
Director

GENERAL SERVICES AGENCY
Recreation Services
County Government Center
Administration Building, L #1030
800 South Victoria Avenue
Ventura, CA 93009
(805) 654-3963
Fax (805) 654-3684

July 16, 1998

TO: Dennis Hawkins, RMA, Planning Division, L#1740

FROM: Theresa Lubin, Program Administrator, L#1030

SUBJECT: **California State University(CSU), Channel Islands Campus Master Plan Draft Program EIR**

Thank you for the opportunity to review the Environmental Impact Report for the subject project. When the Trustees of CSU began analyzing the potential acquisition of the recently closed Camarillo State Hospital for the site of a state university campus, the General Services Agency staff spent many hours working with the CSU staff to identify and mitigate potential impacts from the Camarillo Regional Park project, a northern neighbor to the future CSU site.

V Several concerns that were raised by CSU staff during the 1997 Camarillo Regional Park EIR process were similar to impacts identified in the CSUCI Draft EIR, specifically with respect to noise and traffic. As part of the amphitheater / golf course approval, mitigation measures were adopted that would reduce all noise and traffic related impacts to a less than significant level. Several of the draft studies referred to by Rincon Consultants have recently been updated. I would like to take this opportunity to share some of this more recent information in the hope that it will be useful.

W Land Use and Planning

Page 2-19
Section 2.0 Summary, Table 2.3-1, Impact LU-3:

CSUCI

The Final Noise Abatement Plan (NAP) dated July 10, 1998 has been completed by Giroux & Associates, an independent consultant selected by the Ventura County Planning Division. The County is committed to complying with the General Plan noise standards through a variety of mitigation measures. The following underlined and italicized sections are excerpts from the Final NAP:

The NAP contains five sub-conditions that take a proactive rather than reactive approach to minimizing noise intrusion. These include:

a. *Establish a noise standard determined by the Planning Director as adequate to protect residents of Las Posadas and other noise sensitive sites. The initial standard shall be at least as restrictive as the Ventura County General Plan Policy 2.16.2-1(4).*

W

b. *Install a permanent noise monitoring system to record sound levels at sensitive receptors.*

c. *Maintain a complaint log and document cause/resolution in monthly submittals to the Planning Division.*

d. *Coordinate event calendar with nearest noise-sensitive uses and conduct post-event debriefings with representatives of such uses.*

e. *Prepare a detailed noise mitigation analysis incorporating conservative estimates and effectiveness.*

Requirements c. and d. pertain to an ongoing program of monitoring and coordination with neighboring uses. We hope that the University will see this as a concerted effort on the part of the County to eliminate the potential for land use compatibility conflicts.

Page 5.7-7

Effect LU-3:

X

The information contained under this section was obtained from the FEIR. The following information is from the Final NAP, a much more extensive and detailed noise analysis prepared by an independent consultant Giroux & Associates:

The FEIR for the Camarillo Regional Park Golf Course and Amphitheater recommended that the Ventura County General Plan noise standard applied to

CSUCI

noise generators near noise sensitive uses be used as the project significance evaluation criterion.

In order to accommodate any uncertainty in the propagation decay estimate due to meteorological effects, and to create an additional margin of safety in recognition that peaks will be higher than averages or that annoying low frequency rumble will dominate far from the source, a target level of a 5 dB "cushion" lower than the standard has been established.

The noise compliance standard is as follows (one hour energy-averaged level [LEQ]) :

6 a.m. - 7 p.m.	55 dB(A)
7 p.m. - 10 p.m.	50 dB(A)
10 p.m. - 6 a.m.	45 dB(A)

The target exposure level is 5 dB less than these values.

X

Noise monitoring was conducted at five locations in the vicinity of the amphitheater where noise exposure due to project implementation was a concern. The noise measurements confirmed that the project environs are quiet, but there are minor noise events that create noise levels that are near the minimum compliance standard for the amphitheater and somewhat above the design level of 40 dB LEQ assigned to the proposed project during the highest (post 10 p.m.) Noise sensitive period.

The allowable noise exposure under the General Plan policy after 10 p.m. is 45 dB(A) LEQ or the "Background" + 3 dB, " whichever is greater. Two CCC sites on the State Hospital grounds were included as monitoring locations. The allowable post 10 p.m. noise levels due to amphitheater operations at these two sites would be as follows:

CCC Sites - 45-47 dB (45, or 44 + 3)

The maximum CCC camp facility predicted level for post 10 p.m. exposure is 42 dB, but this calculation is based on a 6 dB per doubling spreading loss for a smooth hard ground surface. Surface irregularities are likely to increase this loss rate, and surface-based inversions which may create sound ducting will be less prevalent along the higher ridge separating the CCC facility from the amphitheater.

CS21CJ

X *The Lewis road and CCC facilities are at an intermediate distance from the source where standard source-receiver relationships are reasonably reliable. At progressively farther distances, the uncertainty due to sound wave bending and reflection increases considerably.*

Noise

Page 2-21
Section 2.0 Summary, Table 2.3-1:

Y Please refer to the NAP excerpts under the Land Use and Planning section above for an explanation of anticipated sound levels at sensitive receptors during amphitheater events. Calculations for post-10 p.m. exposure at the CCC camp facility considered a number of factors including, assumed stage speaker source strength, tower mounted delay speaker source strength, directionality in speaker patterns, intervening terrain and absorption loss. The level of noise from the amphitheater at the CCC site based on these parameters was determined by the independent noise consultant Giroux & Associates to be 42 dB (with the potential of being slightly lower). This is in compliance with the General Plan standard of 45 dB(A) for noise in the 10 p.m. - 7 a.m. time period.

Page 5.8-1
5.8 NOISE:

Please refer to the above passages from the Final NAP prepared by Giroux & Associates for the most recent information on peak noise level impacts from amphitheater events. Noise levels are not expected to exceed threshold criteria at residences located in the north portion of the East Campus.

Page 5.8-8
Effect N-2:

Z The number of events permitted at the amphitheater has been limited to a maximum of 30 per calender year

Page 5.8-9
Effect N-2:

AA The Final NAP offers a different set of calculations than those included in the Draft EIR. Please refer to the passages above from the NAP.

Page 5.8-10
Effect N-2:

AA

The second paragraph brings up the concern again that the amphitheater sound levels will exceed the County General Plan noise standards. The amphitheater project is conditioned to prevent the noise levels from exceeding the County General Plan noise standards.

Page 5.10-29
Effect T-4

AB

The Traffic Management Plan (TMP) as submitted for inclusion in the Draft EIR was also in draft form. A final County approved TMP will meet all County General Plan traffic standards

CS21CJ

County of Ventura
Public Works Agency
Solid Waste Management Department

KAY MARTIN
Deputy Director of
Public Works

DATE: July 17, 1998

TO: Dennis Hawkins, RMA/Planning Division
FROM: Marialyce Pedersen, Recycling Specialist
Lorraine Timmons, Recycling Specialist
SUBJECT: California State University Channel Islands—Draft Environmental Impact Report

After review of the DEIR for the above-listed project, the Solid Waste Management Department (SWMD) offers the following comments.

Estimate of Waste Generation

AC The DEIR provides waste generation estimates for the campus core and 900 residential units. To accurately determine what the actual solid waste impacts of this project will be, the waste generation from the entire project during the three phases needs to be provided, including all uses within the developable area.

Please provide, by each land use type, the expected annual tonnage generation. Included should be the source of the waste generation rates used and the specific calculations (as well as the assumptions within those calculations).

We suggest breaking out generation by the following land use categories, at minimum:

AD
- University Academic Buildings
- Non-University Schools and Day Care Buildings
- Residential Units (including student housing, indicate density)
- Maintenance Areas
- Eating and Drinking Establishments
- Office-Based Professional Services
- Retail Trade
- Other Misc. or Unknown Commercial Uses
- Maintained Lawn
- Other Maintained Landscaping

The SWMD has developed standard waste generation factors, based on square footage or employee, that may help with estimating waste generation by land use.

AE In addition, the SWMD requests that an estimate of the construction and demolition waste that will be disposed and recycled by the three phases of the project be included in the EIR.

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Mitigation Measures - General Comments

AF In all of the mitigation measures listed on page 5.9-5, the word "should" needs to be replaced with the word "shall."

Each mitigation measure should address who, specifically, will be responsible for implementation of the measure.

Each mitigation measure should set forth a time frame for implementation.

Mitigation Measures - Specific Comments

PS-2(a) This is a very important mitigation measure and therefore more specifics should be provided. Mitigation measures PS-2(b) and PS-2(c) should logically be incorporated into PS-2(a), as they are elements of a comprehensive waste reduction and recycling plan.

The SWMD suggests the following rewording:

> A long-term plan for waste reduction and recycling shall be developed and approved by the Solid Waste Management Department prior to issuance of the first Zoning Clearance. This plan will include the following:
>
> - A statement that CSUCI shall abide by the requirements of Executive Order W-7-91, which requires recycling, source reduction, and use of recycled-content products by all State agencies;
> - A statement that CSUCI shall comply with all applicable Ventura County ordinances with regard to recycling by commercial generators.
> - Short- and long-term recycling goals, including plans for tackling harder to recycle materials, such as food and textiles;
> - Short- and long-term source reduction goals, including measures to eliminate single use items, and to encourage reuse of materials as well as use of more durable materials;
> - University policies for buying materials made from recycled content, and buying recyclable vs. nonrecyclable products;
> - Recycling program administration and staffing;
> - Space allocation for recyclables collection containers;
> - Required equipment (containers, vehicles);
> - Plan for ongoing outreach and education to faculty and students;
> - Plan for tracking the tonnage of material disposed, recycled or otherwise diverted from landfill;
> - Policies for training custodial staff for recycling as part of their jobs; and
> - A statement that CSUCI shall meet with staff of the Solid Waste Management Department annually to monitor the success of all waste reduction and recycling efforts and work on improvements.

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PS-2(b) Incorporate this mitigation measure into PS-2(a).

PS-2(c) Incorporate this mitigation measure into PS-2(a).

PS-2(d) The word "recycle" should be changed to "recycled," for grammatical correctness.

PS-2(e) This mitigation measure should be more specific as to what materials will be recycled and provide more flexibility as to how this will be implemented. The SWMD suggests deleting all of item (e) and replacing it with the following:

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> The University shall prepare and implement an organics recycling plan. This plan will outline the methods by which all landscape trimmings, grass, wood and manures generated at the University, except for those items not accepted by local organics recyclers, will be recycled. The plan will address the feasibility of minimizing the generation of landscape trimmings, such as through the selection of low waste producing plant species, grasscycling (leaving grass clippings on the grass), and on-site grinding for mulch or compost production. The plan will also address the feasibility of collecting and recycling food scraps generated at the University.

Cumulative Impacts

In Section 5.9.c (Public Services), cumulative impacts are stated as less than significant because "The Toland Landfill and the Simi Valley Landfill are anticipated to accommodate solid waste disposed within Ventura County for the next 29 years and 10 years, respectively." However, the Toland Landfill currently operates near its permitted daily tonnage limit of 1,500 tons per day, and therefore may be unable to accommodate significant new generators. Similarly, the Simi Valley Landfill land use permits expire in 2004, and approval of proposed permit modifications cannot be assured. Because of these factors, and the significant levels of imported tonnage anticipated in the coming years, the County of Ventura does not currently meet the mandate of AB 939 which requires jurisdictions to demonstrate 15 years of disposal capacity. In addition, siting new landfills has proven extremely difficult in Ventura County. CSUCI has the potential to be one of the largest generators of waste in Ventura County, and it will therefore definitely have unavoidable cumulative impacts.

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Additional Comments

The California State University Channel Islands project is going to be quite large, and even with achieving 50 percent diversion, will contribute considerable waste to the local solid waste infrastructure. At the same time, new Universities don't come along everyday. Even with the considerable addition to the wastestream, the SWMD is excited about the opportunities this facility will offer. CSUCI could become a model for other universities and future developments. We have the chance with this project to implement, from the very beginning, large-scale, innovative waste reduction and recycling strategies.

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We would like to invite the CSUCI project development team to consider some measures that go beyond standard recycling mitigation measures. Here's just a sampling of measures that could be implemented by the University to demonstrate a strong long-term commitment to resource responsibility:

- Construct one, if not more, buildings from as much recycled-content materials as possible (carpet, wallboard, roofing, insulation, tile, asphalt, etc.). Use it as an educational model, with signage to explain the materials that were used.
- Implement an on-site composting operation that would convert the University's landscape trimmings and food scraps into soil amendments and mulch to be used in on-site landscapes. To

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go beyond this, the University could work with the SWMD and local regulators to explore the possibility of setting up a facility for receiving materials from off-site for composting. This could even be a possible revenue generator for the University. A southern California facility for teaching composting is much needed and could also be considered.

The Solid Waste Management Department would be glad to offer assistance with developing and implementing any of these or other innovative programs.

Please call Marialyce Pedersen at (805) 654-3506 or Lorraine Timmons at (805) 648-9226 if you have any questions about this Department's DEIR comments.

Enclosures

Cc: Carole Trigg, Public Works Agency

F/users/everyone/word/ceqa/1998/cscieir2

CSCICJ

MEMO

REVISED July 16, 1998
additions/corrections shown in bold/italic

To: Tom Berg, Director
Resource Management Agency

From: RBB for
Butch Britt, Deputy Director of Public Works
Transportation Department

Subject: California State University, Channel Islands Campus
Master Plan Program Draft Environmental Impact Report (DEIR)
Section 5.10 Transportation/ Traffic
Replaces July 15, 1998 Memo

Date: July 16, 1998

GENERAL COMMENTS:

AK The DEIR identifies several road improvements in the unincorporated area as potential mitigation to increases in traffic generated by the University project and associated commercial development. It does not, however, indicate the cost of these improvements, a source of funding, responsibility for implementing these improvements, or timing for implementation.

AL The DEIR, in several places, discusses the project's net increase of trips over the traffic that would be generated by a fully active state hospital facility. This comparison is irrelevant and references to net increases should be deleted.

AM The DEIR suggests construction of an alternate entrance/exit to the University site from Lewis Road. The Public Works Agency also suggests that various realignments of other existing area roads, such as Laguna Road to intersect with Lewis Road at this new entrance, be considered. This would seem to have the potential of being an effective alternate route for linking University traffic to Las Posas Road. This would reduce traffic volumes on Lewis Road, and improve overall access to the site. This DEIR should contain an analysis of these additional alternatives.

AN Lewis Road is identified as a two lane highway on the 2010 County Regional Road Network, but it is not currently included in the Congestion Management Plan (CMP) system. Cawelti Road is not currently identified in the County Regional Road Network or the CMP. The projected traffic levels, road re-classifications/re-designations and road improvements

recommended in this DEIR will require an amendment to the County General Plan, and CMP system. ***Cawelti Road is also not on the Federal Aid System and is not eligible for use of Federal Aid Funds.***

AO The roads in this vicinity are relatively low volume rural roads in a predominately agricultural area. There are drainage ditches, utility poles or other structures immediately adjacent to the travel way. Because of the maganitude of projected traffic increases, and the changes in character of traffic resulting from the University project and the associated commercial development, the impact on safety as well as the capacity of these roadways should be addressed in the DEIR. Additionally, the DEIR needs to address the direct impacts on agriculture of the acquisition of rights of way to accommodate the widening of roads in the project vicinity. The full impacts of road widenings need to be disclosed, quantified, and analyzed.

AP There is no mention in the DEIR of the frequent presence of farm vehicles or other slow moving traffic. Slow moving farm equipment or extensive parking on the road shoulder by farm workers is common. There are also a number of designated farm equipment crossings that should be included in the analysis of the ability of these roadways to safely and effectively handle the projected additional traffic resulting from the University project and the associated commercial traffic.

AQ A minimal traffic increase on Potrero Road is identified in the DEIR. While additional traffic is not recommended on Potrero Road because of its rugged mountainous terrain, we believe that some additional traffic will migrate toward this route. This should be discussed within the DEIR. Mitigation measures might include improving the safety of this rugged mountainous road or, alternatively, developing effective restrictions for its use.

AR To place this project in context, at full build out it increases traffic volumes on Ventura County roadways by as much as 700 percent. The immediate subset of roadways expected to carry this additional traffic consists of two lane roads that do not meet current road standards and that have slow moving or agricultural traffic with the limitations described above. Additionally, there is little safety lighting (the DEIR projects that night traffic will increase with University operation).

AS The transportation impacts (including both safety impacts and capacity impacts) of 36,535 additional vehicles on Ventura County roadways and adjacent agricultural operations must be fully disclosed and evaluated. The DEIR fails to adequately do this.

SPECIFIC COMMENTS:

	Number	Page/Reference	Comment
AT	1.	5.10-3	The discussion of Las Posas Road as a route between U.S. Highway 101 and the campus needs to be clarified. If Las Posas is to be an access route to the campus, the distribution of traffic exiting U.S. Highway 101 to Las Posas and traveling to Pleasant Valley Road, East 5th Street and Cawelti Road must be analyzed. The discussion of East 5th Street says the intersection of Pleasant Valley Road and East 5th Street is controlled by a traffic signal. This is partially correct, the westerly Pleasant Valley Road/ East 5th Street intersection is signalized, the easterly intersection near Dawson Drive is not.
AU	2.	5.10-7	In Table 5.10-6, the formula for calculating net project added trips is incorrect. It should be reversed, with (short term plus hospital) subtracted from (short term plus CSU Phase 1).
AV	3.	5.10-13	The comparison of CSU traffic to former hospital traffic is irrelevant. Comparison must be to existing conditions (existing environmental setting). Thus the Effect T-1 of the University is an addition of 14,484 ADT to the roadways adjacent to the site. The implication that this is only a net increase of 5178 ADT is misleading. We believe that the level of traffic attributed to a return to hospital use is grossly overstated. Historical records of traffic volumes on Lewis Road and other adjacent roads do not approach the levels assumed in the DEIR if the hospital was in full operation.
AW	4.	5.10-15	Mitigation T1(a) should include improvement of Lewis Road to current road standards for safety as well as capacity reasons, and should also include the segment from Pleasant Valley Road to Cawelti Road. Lewis Road currently functions primarily as a farm access road with a relatively low volume of traffic. There are drainage ditches, utility poles and other rigid encroachments closely adjacent to the traveled way that will require modification prior to the increases in traffic that are projected in the DEIR.
AX	5.	5.10-17	Mitigation T1(c) should incorporate the comments regarding safety improvements required to convert a relatively low volume road primarily used for agricultural use to a commuter route.

CSUCI

Number	Page/Reference	Comment
6.	5.10-22	See comment 2 above. The implication that the traffic increase is only 27,229 instead of 36,535 which has to be accommodated by improvements to the Regional Road Network is misleading. The mitigation measures (T-3) address cumulative impacts. The DEIR should specifically identify project specific impacts. For example, Lewis Road between Cawelti and Camarillo Drive would require widening to 4-lanes based on CSUCI traffic alone.
7.	5.10-28	The comments regarding the Camarillo Amphitheater Project Traffic Management Plan (TMP) are appreciated. However, the TMP has not been approved. The only document that has been approved is the project EIR and the traffic projections contained therein. We recognize the amphitheater traffic will impact the University with regard to the use of Camarillo Drive and that the University's approval of that portion of the plan is required prior to any amphitheater use of Camarillo Drive. It is also recognized that the draft TMP utilizes different traffic distribution factors on the roads, but the TMP is not an environmental document. It is intended to be an operational short range document which will require modification over time as additional traffic from the University is added to the road system, or traffic distribution patterns change.

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CAPITAL IMPROVEMENTS REQUIRED:

The following are not comments on the DEIR. They are an attempt to quantify the costs of road improvements necessary to support the CSU. These are preliminary cost estimates only.

Minimum Improvements:

Lewis Road - increase from two to four lanes and improve to current road standards from Camarillo Drive to Pleasant Valley Road. Improve existing Lewis Road to current road standards (two lanes) from Camarillo Drive to Hueneme Road. Various intersections from Hueneme Road to Pleasant Valley Road will be improved or signalized.

Estimated Cost: $12,000,000

The projected volumes of traffic on Lewis Road north of Camarillo Drive approach the threshold for requiring a six lane roadway using the adopted County General Plan Standards. They exceed the design capacities contained in other engineering reference literature. Lewis Road between Camarillo Drive and Pleasant Valley Road may thus require widening to six lanes within the life of the project. The extension of Laguna Road to Lewis Road at Camarillo Drive, to connect Camarillo Drive to Las Posas Road may also be required.

Probable Required Improvements:
Reroute and improve Laguna Road (current two lane road standard) from the intersection of Camarillo Drive and Lewis Road to Las Posas Road (includes new bridge over Calleguas Creek).

Estimated Cost: $7,000,000

Widen Lewis Road north of Camarillo Drive from four to six lanes.

Estimated Cost: $3,500,000

Widen Cawelti Road from two to four lanes.

Estimated Cost: ***$4,300,000***

Estimated Total Cost: ***$26,800,000***

Discussion:
The above costs estimates are based on an average cost of $1,000,000 per lane mile of roadway (typical development cost per lane mile in Ventura County). The above estimates do not include cost of improvements within the City of Camarillo, such as widening Lewis Road from Pleasant Valley Road to Route 101, improving or widening Pleasant Valley Road from two to four lanes, widening Pleasant Valley Road between Pancho Road and Lewis Road, intersection improvements (within the City) or freeway interchange improvements. They also do not include widening of Lewis Road beyond that needed to bring the road to current road standards south of Camarillo Drive or widening of the bridge at Calleguas Creek which would be required if the traffic distribution varies significantly. Additionally, they do not include improvements to Potrero Road (which would be extremely expensive), but may be necessary in the future. If the assumed project traffic or trip distributions vary significantly after more analysis, the improvements required and associated costs will change accordingly.

MAINTENANCE REQUIREMENTS:
Road Maintenance:
The average annual cost of road maintenance per lane mile in the county is approximately $5,000 per lane mile. Adding approximately 6-8 lane miles of roadway will increase County maintenance costs approximately $30,000 - $40,000 per year.

Public Transit:
The average cost to run a shuttle bus is about $50/hour including operator, maintenance, fuel, etc. Assuming operation for 12 hours per day, 6½ days per week, the cost of providing public transportation services to the University from Camarillo would be approximately $202,800 per year.

ADDITIONAL FUNDING REQUIRED:

Capital Improvements:

The only known potential source of funding for road improvements of the scope identified in the EIR is the federal-aid program. This was formerly authorized under the Intermodal Surface Transportation Efficiency Act (ISTEA). Congress has recently reauthorized the program by passing the Transportation Equity Act for the 21st Century (TEA-21).

The federal-aid program funds are allocated by the Ventura County Transportation Commission (VCTC).

Prior to passage of TEA-21, it was estimated that $16 million would be made available on a competitive basis for the Regional Surface Transportation Program (RSTP) under the reauthorization act for the period 1998-2004. Of this amount, the County of Ventura has already been allocated $4 million for improvement of a portion of Lewis Road (northerly of Camarillo Drive). It is anticipated that TEA-21 may result in the availability of as much as an additional $6 million for the RSTP. However, there is no assurance that any of these additional funds will be made available to address University traffic impacts. ***Cawelti Road will have to be added to the Federal Aid System.***

Our expectation and planning have been based on the assumption that the University will grow gradually from approximately 1000 students to 10,000 students over a period of years. We did not anticipate commercial or residential development building out concurrently from the beginning of the project. Our intent was to phase construction of the road improvements as they are needed, or as the University grows. Even if this assumption is correct, additional funding sources will have to be found to fund full build out level improvements. If University traffic increases at an accelerated rate, the transportation improvements and funding sources will be required at an earlier date.

Based on the current county traffic impact mitigation fee (Ordinance #4071) and the reciprocal traffic agreement with the City of Camarillo, the university development would normally be required to pay a traffic impact fee of approximately $6.3 million dollars ($4.2 million County/ $2.2 million City of Camarillo). The traffic impact mitigation fee is necessary to fund improvements to County (and City roadways when applicable) necessitated by the cumulative traffic impact of the project. While State agencies may normally be exempt from traffic impact fees, there is a demonstrable adverse environmental impact on the County road system caused by this development. Under CEQA, the project proponents are required to mitigate these impacts (both specific and cumulative impacts) where a mitigation measure is reasonably available.

Anticipated Revenue

1. TEA-21 Funds	$ 4,000,000
2. TIMF Funds	$ 4,200,000
Total	$ 8,200,000

Includes unincorporated area revenues and requirements only.

Requirements	
1. Minimum	$12,000,000
2. Maximum	*$26,800,000*
Shortfall *	
1. Minimum	$ 3,800,000
2. Maximum	*$18,600,000*

* If the university or site authority does not contribute toward road improvements, the shortfall will be $4.2 million greater in each cost. Some future funding may also be available from future federal acts but this can not be assumed.

Additional road maintenance and public transit operating costs will have to be accommodated within future operating budgets of the Public Works Agency unless the site authority or benefitting cities are willing to participate in the costs.

WBB-RBB.690:sa

c: Arthur E. Goulet
Robert B. Brownie

Letter 10

Commentor: Thomas Berg, County of Ventura Resource Management Agency

Date: July 20, 1998

Responses:

A. The commentor introduces a series of Ventura County memoranda directed to his office regarding the Draft EIR. These are addressed directly below.

B. The commentor states that the Environmental Health Division did not receive the Notice of Preparation, and requests to be included by the Resource Management Agency in the future. This is an internal Ventura County matter and no response is necessary.

C. This issue is discussed in Section 5.11.3, *Hazards*. The reason for listing was an underground storage tank that had been leaking; this tank was removed and remediation complete, as stated in the EIR. The Final EIR will include updated and corrected information to respond to this comment.

D. Presently, four underground storage tanks are located within the Master Plan site. Three of these are diesel tanks, and one is a gasoline tank. One of the diesel tanks is located on the eastside of the S & T building. The other two diesel tanks and the gasoline tank are located near the boiler plant. All four are scheduled for removal and replacement with above-ground tanks by October 1998. The removal and replacement efforts are being overseen by the State Department of General Services. As part of the removal process, the State Department of General Services will be required to test the remaining soils for any contamination. The commentor's agency will be required to review the assessment at that time, and will oversee any remediation efforts that may be required. Ultimately, the commentor's agency will rule on closure of these sites.

E. The Mitigation Measure PS-2(e) specifies that greenwaste mulching operations should be sited at the facilities maintenance yard, to be located at the southern edge of the campus core along Potrero Road. This location is remote (at least 900 feet) from all educational and residential facilities and on the other side of a small hill. The day care center will be located more than 2,000 feet from the future facilities maintenance yard, while the nearest eldercare facilities would be more than 3,600 feet from this yard. At the time that more information regarding the public health significance of bioaerosols from composting is known, the use of such methods will be re-evaluated by the CSU.

F. The commentor provides information related to greenwaste chipping and composting requirements of the State, which are hereby noted.

G. The comment is noted and the recommendation is hereby incorporated as part of the Final EIR. Site officials currently responsible, including the State Department of General Services Chief of Public Works Operations, are unaware of this condition, and will

inquire with the commentor's agency regarding this condition. In any case, the CSU would comply with state law in the event that an unidentified landfill were discovered during grading or construction activity.

H. Mosquito breeding problems that might arise on the campus would be addressed as part of ongoing grounds maintenance activities and would be addressed by facilities maintenance professionals.

I. The project description for the revenue-generating uses is necessarily somewhat nebulous since the project under consideration is a Master Plan and not a specific development proposal, as explained in the DEIR. The commentor also expresses the opinion that mitigation measures, particularly for off-site traffic impacts, are not detailed enough to assure their effectiveness or feasibility. The DEIR presented and the FEIR will present currently available information from responsible sources, including the County's own transportation records, regarding previously planned right-of-ways and buildout geometrics. The EIR also includes analysis prepared by the EIR traffic consultant that specifically states the recommended changes in the geometrics of the road transportation system to accommodate both project-related traffic and cumulative traffic growth. The measures are effective for the level of growth forecasted by the traffic engineer, provided that right-of-way and funding are available. Whereas CSU and County officials continue to work on these issues, the EIR acknowledges that in the case of traffic impacts, if recommended augmentations to roadway systems are not funded, unavoidable significant impacts may occur.

J. The correction is noted. The Final EIR will reflect the commentor's correct information.

K. Issues regarding the role of the County relative to the proposed Site Authority remain unresolved, though both CSU and County officials continue to work on the issues jointly. In addition, whether the County would be the lead agency is also not yet determined. To the extent that these issues are not resolved through the Site Authority legislation, the County would have normal regulatory authority over some private, proprietary activity. The County and CSU have acknowledged that this activity would be reviewed through the County's adoption of a Specific Plan and Development Agreement. Because of this unresolved status, it would be speculative to further assert details relative to lead agency responsibilities. Amendments of the Ventura County General Plan, Zoning Ordinance, and similar policy documents and ordinances within the County's jurisdiction are at the County's discretion. The EIR notes (page 3-7) that the CSU has agreed with the County of Ventura to prepare a Specific Plan and Development Agreement.

L. The commentor has highlighted details about the project description that remain unknown. The academic enhancement center's ultimate size is unknown, but current planning has established it at 40,000 gross square feet (page 3-19). Its function is implicit in the description provided in the EIR. It will serve for small to medium sized conferences or seminars that support the educational mission of the CSU. Consequently, its traffic generation is contained within that which is typically generated

by a university of this size, and such traffic would typically not occur during the critical peak hours of traffic movements. The seminars may involve overnight stays, which would be at least partially accommodated by the limited lodging. Lodging for this center may also be included within the proposed student housing portion of the core campus. The ultimate design and program will be developed by the CSU and the Site Authority along with the development team at a future date.

Likewise, details about the actual mix of type of housing have not yet been determined. Nevertheless, an ultimate numerical cap on dwelling units has been prescribed for purposes of analysis in the EIR. As stated in the State CEQA Guidelines Section 15146, the "degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR." In this instance, the impacts of the 900 dwelling units were assessed based on multi-family style units, using the typical generation rates associated with such uses. Because of this, the EIR may overstate the level of impact, for example, when applying the trip generation rate for multi-family housing instead of the lower rate associated with senior housing.

M. The commentor correctly states that the details of mitigation responsibility remain to be resolved. At stated in Section 2.3.3, *Mitigation Responsibility*, the California Constitution prohibits the CSU from being placed under the jurisdiction of a local government. The CSU is not exempting itself from mitigation responsibility, rather it is indicating what it is legally required and intends to do. As indicated in the *State CEQA Guidelines* Section 15040(e): *"the exercise of discretionary powers for environmental protection shall be consistent with express or implied limitations provided by other laws."* The CSU has been exempted by the courts from most special assessments, such as traffic impact mitigation fees. Consistent with CEQA, mitigation measures have been considered within the EIR that are outside of the responsibility and jurisdiction of the CSU, and consistent with CEQA Section 21081(b), findings will be made regarding such measures if and when the property is accepted by the Trustees and the Campus Master Plan is approved.

As discussed in the EIR and in this comment, the Site Authority as currently proposed would have the authority to provide funding for off-site mitigation. Since this is still an active legislation not yet adopted by the State, it is not possible for the EIR to determine the extent to which the Site Authority may contribute funds to off-site mitigation efforts. As indicated by the comment, this may ultimately be settled by the Development Agreement to be signed by the County and the CSU Site Authority. The CSU is continuing to work with the County of Ventura on details of the financial responsibility of infrastructure augmentations, including what the appropriate "fair share" contribution by the CSU to off-site traffic effects may be. Nonetheless, the mitigation measures contained in the EIR are still "real" no matter who becomes the ultimate funding agency. In the event that such measures are never implemented, the EIR considers offsite traffic impacts to be an unavoidable adverse impact of the proposed project since the CSU does not have the jurisdictional authority for such off-site improvements. We agree it is infeasible to divert CSU education dollars to offsite roadway improvements, and a Statement of Overriding Considerations respecting these impacts will be made if the Trustees approve the project.

N. Amendment of the County's General Plan, Regional Road Network, zone changes, and ordinances are at the County's discretion and are not required permits or approvals of the proposed Campus Master Plan at this time. While it makes logical planning sense to amend the General Plan to eliminate inconsistencies regarding the proposed uses on State-owned lands, such inconsistencies do occur within other jurisdictions. It is anticipated that such actions would likely occur at the time that the Specific Plan is finalized. The EIR has been amended to indicate that the County would likely conduct the actions described in this comment.

O. These roadways, except for Santa Barbara Avenue, are illustrated on Figures 3-4 and 3-5, however, the text is small and difficult to read. Camarillo Drive is the main entry to the site and is well marked on Figure 3-3, while the text clearly explains the location of the Santa Barbara Avenue extension. Figure 3-4 will be supplemented to more clearly show these streets.

P. Maps and extensive photographs illustrating the historical architecture of the site are contained in the historical resources report, which was incorporated by reference and is therefore an integral part of the EIR. Because of the technical nature of this study, it is appropriate per the *State CEQA Guidelines* that such information be so incorporated.

Q. Comment noted. The feasibility of reuse of this structure is still undergoing analysis; the initial discussions have indicated that it is not. Therefore, the language in the measure is correct in its intent; the requirement for detailed documentation of this historic resource is the primary mitigating action.

R. The comment is correct in that the CSU does not have jurisdictional approval authority over the Camarillo Regional Park amphitheater NAP. As indicated in the EIR text in the paragraph prior to Measure N-2(a), the CSU only has the right of review. "Approve" in this context meant "to accept without comment" rather than a jurisdictional approval. Since the CSU does have discretionary authority over whether or not it accepts the NAP, that word shall be used in place of "approval."

S. The location for the application of rubberized asphalt is clear from the context of the environmental issue; namely that it would serve to reduce noise impacts along Cawelti and Lewis Roads at those locations adjacent to noise sensitive uses. Responsibility and payment for this measure are dependent on whether or not the Site Authority is approved by the State Legislature, as discussed in Section 2.3.3 of the Draft EIR. The Mitigation Monitoring and Reporting Program will further discuss potentially responsible parties. This measure may be considered ineffective in that it would not reduce cumulative noise impacts at these sensitive uses to below the County thresholds and it may also therefore be deemed infeasible. It is noted that current noise levels already exceed County thresholds at many of these properties, and cumulative noise impacts are considered significant and unavoidable.

T. The issue of mitigation responsibility for roadways is a central issue regarding the entire Campus Master Plan project. Please refer to comments and responses 10I, 10K, and 10M

above. As stated in Section 2.3.3 of the EIR, if the Site Authority is enacted by the legislature, it is possible for that entity to take on mitigation responsibility for impacts on the road system. In the event that the Site Authority is not enacted, then the responsibility for maintaining a suitable road system lies with those public entities that are specifically authorized by legislation to do so and receive tax monies for that purpose, which is local governments. The CSU has no access to such funding for road systems that are used not only by those using the CSUCI, but by the general public as well. Similarly, the responsibility and authority for providing higher education is invested in the California State University, University of California, and the California Community Colleges systems. Local governments do not make any contribution to the construction and maintenance of university and college facilities. The CSU and County officials continue to work on the details of the roadway mitigation program. The EIR does not address the funding of mitigation measures, nor is it required by CEQA to do so. The EIR identifies mitigation measures; the feasibility of these measures both from a physical and a funding standpoint will be considered at the time that the CSU Board of Trustees makes its CEQA findings and considers adoption of the Campus Master Plan and acceptance of the property from the State Department of General Services.

U. Comment noted. A discussion of the Draft TMP developed for the Camarillo Regional Park project was included in the DEIR as this was the most current version of the plan available at the time the DEIR document was prepared. Because of the significant traffic issues involved with the Camarillo Regional Park project within the study-area, a discussion of the most current proposal was required in order to provide an adequate CEQA review.

V. The commentor notes that several draft studies commissioned by the Ventura County General Services Agency that were referenced in the EIR have been updated. The comment is noted.

W. The commentor notes that the Final Noise Abatement Plan dated July 10, 1998 includes five new conditions to address noise-related land use compatibility conflicts. The information is hereby incorporated into the Final EIR. The conclusions and recommendations in the EIR would not change as result of this information.

X. The commentor provides additional information regarding noise characteristics that may be expected for portions of the Master Plan area. As discussed in the EIR (page 5.8-9), the conclusion of the NAP regarding the expected noise level at the proposed university housing appears to be low and does not reflect the potential annoyance nature of low frequency sound levels. The conclusions and recommendations in the EIR do not change as result of this information.

Y. The commentor requests consideration of new information provided by the County's General Services Agency noise consultant regarding noise characteristics that could be expected for portions of the Master Plan area. This information represents a different view of possible noise effects, and suggests that peak noise levels may not exceed threshold criteria for residential uses in the East Campus area. This information is

herein noted. Please refer to page 5.8-9 in the Draft EIR for a discussion of the calculations of the Giroux &Associates report, which do not appear to have changed since the earlier version reviewed by the EIR consultant.

Z. The comment is noted, and the Final EIR will be corrected to address this change.

AA. The new information is noted and acknowledged. The comment does not provide the actual calculations, and the Leq as a result of the amphitheater reported for the project site is the same as that previously reported in the NAP. In addition, the NAP based on these excerpts still does not appear to address several of the issues regarding noise that were previously raised by the CSU and its noise consultant (Dohn and Associates). While the amphitheater may be conditioned against exceeding the County General Plan noise standards, the NAP still apparently does not contain those measures that would aid in this enforcement, such as the use of monetary penalties for non-compliance and use of sound-limiting equipment, as recommended in Mitigation Measure N-2(a).

AB. The comment is noted. The EIR preparers worked with the most current information available at the time, even delaying the release of the Draft EIR until additional details regarding the Traffic Management Plan could be provided.

AC. Please refer to Table 5.9-2, *Solid Waste Generation*, on page 5.9-4 of the Draft EIR. Solid waste generation is provided for each of the three phases. Given the level of accuracy associated with waste generation factors, an inventory for each segregated use is not considered necessary. Please see the following response for further information.

AD. The commentor suggests a more detailed disaggregation of the categories of waste generating land uses be devised. However, such a breakdown would impart a false level of accuracy to information which is better analyzed in a general fashion. The solid waste generation rates used for campus activities are derived from another California State University campus that has been operational for 30 years. This actual data was then applied to known square footage totals for the proposed uses for the campus-related uses. Uses at the CSU campus which are included in this waste generation factor include residence halls, day-care facilities, theaters, Alumni Center, animal care facilities, museums, eating and drinking establishments, football stadium, and extensive lawn and landscape area. Since the EIR is a program-level document, we believe it is most prudent to use empirical data from a similar facility applied to known square footage estimates for the proposed project to derive expected solid waste generation totals.

With respect to residential uses, the Ventura County factors were employed.

AE. Section 3.7.6 of the Draft EIR contains an estimate of the approximate amount of material that would be generated during demolition of existing structures. The amount of material that can be recycled is unknown at this time since it will be dependent on the actual nature of the buildings to be removed. It appears that much of the material within structures to be demolished on the West Campus and part of the old employee

housing can be recycled as non-structural fill. Please see Mitigation Measure PS-2(d), which partially addresses the concern of solid waste generated from demolition activities.

Increasingly, demolition contractors are engaged in recycling demolished materials. This has resulted from the economic benefits to the contractors, which will can generate revenue by selling salvageable materials while avoiding tipping fees at landfills.

AF. The comment is noted. The word "should" was used I part because the EIR is not the document that adopts mitigation measures, rather it is The CSU Board of Trustees that has that responsibility as Lead Agency during its deliberations regarding the project. For convenience, the word "should" will be replaced with "shall" for mitigation measures PS-2 (a), (b), (c), (d), and (e) in the Final EIR. The timing and responsibility for implementing mitigation measures will be defined in the Mitigation Monitoring and Reporting Program, which will be reviewed by the California State University Board of Trustees at the time they review the proposed project for final action.

AG. The commentor's suggestions as to modifications of Mitigation Measure PS-2(a) are noted. With respect to Executive Order W-7-91, the CSU is already subject to the law so its inclusion as a mitigation measure is not necessary. The CSU is not subject to Ventura County ordinances. However, Mitigation Measure PS-2(a) requires a plan that would contemplate each of the numerous suggestions included here. The grammatical correction to Mitigation Measure PS-2(d) will be made for the Final EIR.

AH. The suggestions to modify Mitigation Measure PS-2(e) are noted and can be considered by the Board of Trustees as an alternatively worded measure.

AI. The information provided by the commentor contradicts that supplied by Dan Vidal of the Simi Valley Landfill and Greg Warren of the Ventura County Solid Waste Management Department. It is the responsibility of the County, not the CSU, to meet the mandate of AB 939. The disagreement with the conclusion about cumulative solid waste effects is noted. In addition, cumulative solid waste effects do not necessarily need to be met within the County. Riverside County recently approved the Eagle Mountain Landfill, which at a capacity of 20,000 tons per day could serve almost all of southern California. Transit of solid waste to this landfill is readily available by rail.

AJ. The commentor suggests additional mitigation measures which could serve to enhance the CSU's ability to expand its academic mission to include waste reduction technologies and study. The CSU has already established relationships with transportation technology concerns, and may expand its mission further to address other environmental science research and development issues. The comment is appreciated, and the CSU welcomes continuing dialogue with the commentor and the commentor's agency.

AK. Mitigation financing and responsibility are discussed in Section 2.3.3. See also Response to Comments M & T above.

AL. CSUCI impacts were measured against existing conditions. Trip generation and level of service data for the State Hospital is provided for comparative purposes (showing what would happen if the Hospital were to re-open in the future). All impacts and mitigation measures identified in the DEIR are based on the full level of traffic generated by the CSUCI project added to existing and buildout traffic volumes.

AM. Realignment of Laguna Road to intersect with Lewis Road opposite the secondary entrance would provide a more direct route between the southern portion of the campus and traffic draws to/from the west. However, with the new Lewis Road/U.S. Highway 101 interchange improvement project, a significant amount of traffic would shift from Las Posas Road to Lewis Road (see response to Comment A and B in Letter 7), thus the usefulness of the Laguna Road extension would be reduced. It is estimated that with the Lewis Road/U.S. Highway 101 interchange improvement project, the Laguna Road extension would carry 2,000 ADT to 3,600 ADT (5% to 10%) generated by buildout of the project. While this shift in project traffic would reduce volumes on Lewis Road and Cawelti Road, it would not eliminate the need for the improvements outlined in the DEIR and the revised analysis completed for the Lewis Road/U.S. Highway 101 interchange alternative. As stated in Section C of this report, it is difficult to predict the actual behavior of motorists more than a decade in the future and it is possible that a Laguna Road extension could serve more traffic. The recommendation and implementation for future roadway improvements are expected to be made at such a time as monitoring of traffic growth in the area indicates that such improvements are justified.

AN. Comment noted. The text on Page 5.10-20 discusses the need for amendments to the County General Plan. As noted above, widening and reclassification of Cawelti Road would not be required with the Lewis Road/U.S. Highway 101 improvement project.

AO. As stated in the DEIR, "Recommendations for roadway widening may require additional right-of-way and relocation of drainage facilities and utility poles, particularly along the two-lane roadways segments south of Pleasant Valley Road (e.g. Cawelti Road, Lewis Road). The County's existing Circulation Element and Traffic Fee Program may also require amendments to include the recommended improvements. Funding of the improvements is discussed in Section 2.3.3."

AP. The capacity improvements recommended for the rural roads would be designed according to County design standards. County standards provide for motor vehicle safety. The roadway widenings recommended in the DEIR would provide standard width travel lanes and shoulder areas for slow moving vehicles. If parking along the roadways becomes a safety issue, it could be restricted by the County. It is noted that in the area of question (Cawelti Road in particular), anecdotal observations indicate that parking by farm workers is generally well off the pavement.

AQ. The DEIR estimated that Phase 1 would add 724 ADT and Buildout of CSUCI would add 1,800 ADT to Potrero Road. These traffic additions were determined to be insignificant and mitigation measures are therefore not necessary. It is the University's intention to

restrict the use of Potrero Road by focussing access to and from the campus away from this area.

AR. Comment noted. No response is necessary.

AS. The EIR consultant disagrees with the commentor's opinion. The DEIR does identify significant traffic impacts that would result from development of the CSUCI project as well as buildout of the City of Camarillo and the surrounding areas of Ventura County. A comprehensive set of traffic improvements have been identified to mitigate the impacts of the project.

AT. Impacts to the Las Posas Road corridor and linked routes are identified and mitigation measures are recommended. It is noted that very few project trips would be expected to travel on Las Posas Road to Pleasant Valley Road to access Lewis Road, as the connection to Cawelti Road provides a more direct route. Furthermore, no project traffic would travel on Las Posas Road to East 5th Street to Lewis Road, as this is an extremely circuitous route.

Subsequent analysis was completed for the Lewis Road and Las Posas Road interchanges to account for the Lewis Road/U.S. Highway 101 Interchange project. The interchange project would make Lewis Road the preferred freeway access for CSUCI (it will be signed for CSUCI) and estimated university-related traffic at the Las Posas Road interchange would be reduced. See response to Comments A and B of Letter 7 for more information on this alternative.

AU. Net project-added trips are correctly shown in Table 5.10-6, however the footnote is incorrect and will be revised.

AV. See response to Comment AL above.

AW. Lewis Road would be widened to four lanes between Cawelti Road and Camarillo Drive according to County design standards, which would provide additional capacity as well as safety enhancement. Widening Lewis Road to four lanes between Cawelti Road and Pleasant Valley Road would not be required for Phase 1 traffic. The text for Mitigation T1(a) on page 5.10-15 will be revised to address the County's safety concerns (see Section C of this report for EIR text revisions).

AX. As outlined in the DEIR Cawelti Road would carry 7,400 ADT with buildout of Phase I. With the Lewis Road/U.S. Highway 101 improvement in place, Cawelti Road would carry similar volumes (7,000 ADT - 8,000 ADT) with buildout of the campus, thus negating the future need for a 4-lane section. The text for Mitigation T1(c) on page 5.10-17 will be revised to address the County's safety concerns (see Section C of this report for EIR text revisions).

AY. As noted in response to Comment AL, trip generation and level of service data for the State Hospital is provided for comparative purposes (showing what were levels generated in the recent past from the site and what would happen if the Hospital were to re-open in

the future). All impacts and mitigation measures identified in the DEIR are based on the full level of traffic generated by the CSUCI project added to buildout traffic volumes. The cumulative analysis examines long-term traffic improvements required for buildout of the City of Camarillo, the surrounding area of Ventura County, as well as the University.

AZ. Comment noted. A discussion of the Draft TMP developed for the Camarillo Regional Park project was included in the DEIR as this was the most current version of the plan available at the time the DEIR document was prepared. Because of the significant traffic issues involved with the Camarillo Regional Park project within the study-area, a discussion of the most current proposal was required in order to provide an adequate CEQA review.

BA. Costs of potential funding of roadway system improvements are noted. No response is necessary.

VENTURA COUNTY
TRANSPORTATION COMMISSION
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(11)

July 17, 1998

Mr. Handel Evans
California State University, Channel Islands
1878 South Lewis Road
P.O. Box 2862
Camarillo, CA 93011-2862

Dear Mr. ~~Evans~~ Handel:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the California State University, Channel Islands. The Ventura County Transportation Commission (VCTC) has completed its review of the DEIR and offer the following comments concerning transportation and circulation referenced to page numbers.

Page	Comment
2-7	**Section 2.3.3 Mitigation Responsibility** - The DEIR fails to clearly state who has the responsibility for mitigating impacts on the road system. This section states that mitigation measures suggested within the DEIR are the responsibility of the County or other public agencies and then goes on to state that a "Site Authority" may be formed and that the Site Authority may be responsible for funding mitigation measures.
A	The DEIR should clearly define the roles and responsibilities of all agencies involved in impact mitigation. Local agencies have been willing to enter into partnership with CSU and provide funding opportunities such as the four million dollars already programmed by VCTC for Lewis Road University Access improvements. CSU's responsibilities and commitments need to be clearly laid out within this document.

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5.10-7

B

Camarillo State Hospital Trip Generation - The discussion of hospital reuse or historic use is non-applicable and misleading. CEQA requires that projects be analyzed in comparison to current conditions, i.e. those current uses specified in section 5.7-1. Any discussion of trip generation or tables throughout the DEIR should be made in the context of additional project generated trips only.

5.10-15
-5.10-28

C

Mitigation Measures - Although the DEIR lists a full range of near and long term road improvements that will be required for impact mitigation, it does not contain a discussion of the cost or phasing associated with those improvements.

D

The DEIR is not clear whether agricultural activity such as slow moving farm vehicles and the many tractor crossings in the area have been considered when calculating road capacity for mitigation measures. If so this should be clearly stated. Additionally, the mitigation measures should clearly discuss roadway safety especially as it relates to agricultural activity in the area.

E

The DEIR suggests the construction of an alternate entrance to the University from Lewis Road. VCTC agrees with the comments made by the County that a realignment of Laguna Road could greatly improve access to the University and should be included the Traffic/Transportation analysis.

F

Mitigation T1(a) Lewis Road - Lewis Road improvements should include the provision of bicycle lanes.

G

Mitigation T-3 - Mitigation T-3(a) identifies U.S. Highway 101 as needing widening as a result of buildout in Ventura County. Are the other road improvements listed this section similar in that improvements are required because of buildout? If so, this should be stated and the University's share of the cumulative impacts should be discussed particularly as it relates to the County's current Traffic Mitigation Fee Program.

5.10 -13 &
5.10 - 20

H

Tables 5.10 - 4/5.10 - 8 Campus Master Plan Trip Generation - These tables should specifically identify the land uses and trips generated that are not connected with CSU's educational and research mission so that local jurisdictions can accurately assess any traffic mitigation fees that private development will be responsible for.

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5.10 -16 &
5.10 - 23

I

Figures 5.10 - 6,8 & 9 CSUCI Traffic Volumes - The DEIR does not take into account the Lewis Road/U.S. 101 interchange improvements that will be completed within Phase I of the project. These improvements will likely shift traffic from Las Posas Road to Lewis Road and consequently change the mitigation measures needed. VCTC suggests that traffic distribution and associated mitigation measures be reevaluated.

5.10-30

J

Transit - The DEIR incorrectly states that South Coast Area Transit (SCAT) serves the City of Camarillo. Additionally, this section does not discuss the role of Metrolink or Amtrak in serving the project.

K

Although the VCTC is aware of the work in progress to develop transit services to the project, the DEIR needs to clearly discuss CSU's current plans for serving the campus' transit needs. The DEIR should discuss the use of campus parking fees to subsidize transit use, the use of smartcards to access transit, the number and location of park and ride lots that will serve as off campus parking, the clean shuttle service to and from those lots, and the partnerships with VCTC, local agencies and CALSTART.

5.10-32

L

Congestion Management Program - The DEIR incorrectly states the criteria set forth in the Ventura County Congestion Management Plan (CMP). Level Of Service (LOS) F is only allowed at those locations that were operating at LOS F at the time of the original CMP's adoption. Any other locations operating at LOS F would be subject to the CMP regulations.

Again, thank you for this opportunity to review and comment on the Draft Environmental Impact Report for the California State University, Channel Islands. If you have any questions regarding our comments please feel free to contact Steve DeGeorge at (805) 642-1591.

Sincerely,

Ginger Gherardi
Executive Director

Letter 11

Commentor: Ginger Gherardi, Ventura County Transportation Commission

Date: July 17, 1998

Responses:

A. The issue of mitigation responsibility for roadways is a central issue regarding the entire Campus Master Plan project. Please refer to comments and responses 10I, 10K, and 10M above. As stated in Section 2.3.3 of the EIR, if the Site Authority is enacted by the legislature, it is possible for that entity to take on mitigation responsibility for impacts on the road system. In the event that the Site Authority is not enacted, then the responsibility for maintaining a suitable road system lies with those public entities that are specifically authorized by legislation to do so and receive tax monies for that purpose, which is local governments. The CSU has no access to such funding for road systems that are used not only by those using the CSUCI, but by the general public as well. Similarly, the responsibility and authority for providing higher education is invested in the California State University, University of California, and California Community College systems. Local governments do not make any contribution to the construction and maintenance of university and college facilities. The CSU and County officials continue to work on the details of the roadway mitigation program. The EIR does not address the funding of mitigation measures, nor is it required by CEQA to do so. The EIR identifies mitigation measures; the feasibility of these measures both from a physical and a funding standpoint will be considered at the time that the CSU Board of Trustees considers adoption of the Campus Master Plan and acceptance of the property from the State Department of General Services.

B. CSUCI impacts were measured against existing conditions. Trip generation and level of service data for the State Hospital scenario is provided for comparative purposes (showing what has happened in the recent past and what would happen if the Hospital were to re-open and be fully active in the future). All impacts and mitigation measures discussed in the DEIR are based on the full amount of traffic added by the CSUCI project to existing and future traffic volumes. This methodology is explained on Page 5.10-7 of the DEIR.

C. Cost estimates for mitigation measures are not required by CEQA. The DEIR does discuss the improvements which would be required for Phase 1 and for buildout of the campus. Implementation of the improvements as the university grows would occur on an as needed basis by the appropriate agency (State, County, City of Camarillo). Also see Section 2.3.3 of the DEIR for a discussion of mitigation implementation.

D. The mitigation measures outlined in the DEIR assume that the improvements outlined for the study-area roadways would be completed to County standards, which would include adequate shoulder areas for slow-moving vehicles or disabled vehicles. Such improvements have been added to the mitigation measures (See Section C of this report).

E. The Campus Master Plan proposes (rather than "suggests") construction of a secondary access to the campus core via the Santa Barbara Avenue extension for the buildout analysis. The traffic analysis does not, however, include an analysis of the realignment and extension of Laguna Road to the secondary entrance as this roadway extension is not part of the project description nor is it a funded improvement. Also see response to Comment AM of letter 10 above.

F. Improvements to Lewis Road would have to be designed to meet current County road standards, including bike lanes if required by the County.

G. The DEIR notes that U.S. Highway 101 will require widening with or without CSUCI. With respect to other mitigation funding issues, please see Section 2.3.3 of the DEIR.

H. Tables 5.10-4 and 5-10-8 do show the trips which would be generated by the University portion of the project versus the trips which would be generated by the ancillary development proposed within the Campus Master Plan. The trips for each of these two use types are subtotaled within the tables.

I. See response to Letter 7, Comment A.

J. Text changes will be made to the Final EIR to reflect this comment. See Section C of this report.

K. CSUCI, CALSTART and the VCTC have initiated discussions on how the three agencies will develop and implement alternative travel mode service to the site, including transit. For the smaller Phase 1 development, this will include provision of VISTA service to the campus. A dedicated fixed route system serving the campus would be implemented and expanded as the campus grows. While the specific details of the future transit service have not been defined at this time, it is anticipated that many of the measures outlined in this comment will be incorporated. The DEIR also includes a TDM program to reduce vehicular activity generated at the site.

L. Text changes will be made to the Final EIR to reflect this comment. See Section C of this report.

Ventura County
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Richard H. Baldwin
Air Pollution Control Officer

12

July 16, 1998

George P. Dutra, Director
Facilities Planning
California State University, Channel Islands
1878 S. Lewis Road
Camarillo, CA 93001-2862

SUBJECT: Draft Program EIR for California State University, Channel Islands

Dear Mr. Dutra:

Thank you for the opportunity to review the Draft Program EIR for the California State University, Channel Islands Campus Master Plan. Upon review, APCD staff has the following comments:

A 1) Page 5.2-1, italicized paragraph, line 9: delete "but less than the on-site population of the former site." And delete "nonetheless" and replace with "Therefore growth..." The statement as currently written is not relevant to AQMP population projections.

B 2) Page 5.2-3, Sensitive Receptors Line 2: delete "considered sufficient with an adequate margin of safety." Line 3, delete "They" and replace with "The ambient air quality standards..." This section should also discuss the sensitive receptors near this project, such as the ARC facilities, Casa Pacificia, and Las Posadas.

C 3) Page 5.2-5, paragraph 2, line 4: The APCD strongly recommends that construction-related ROC and NOx emissions be mitigated regardless of the pounds per day generated by construction activities.

D 4) Page 5.2-5, paragraph 2, line 3: insert "air quality" after "cumulative."

E 5) Page 5.2-5, Project Impacts and Mitigation Measures: Paragraph 1, line 1: identify "various air pollutants." Paragraph 2, identify which buildings are to be demolished and whether asbestos removal is required. Paragraph 4, delete the last sentence or make the following revision: insert "a" before "significant" and insert "air quality impact" after "significant."

F 6) Page 5.2-6, AQ-1(a) Dust Control Measures: Add the following mitigation measures: Water areas to be graded prior to grading or land clearing. Application of water (preferably reclaimed water) should penetrate to the depth of the proposed cuts. Inactive disturbed surface areas shall be watered or be treated with dust suppressants applied in sufficient quantity and frequency to maintain a stabilized surface or establish a vegetative ground

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covering within 21 days after active operations have ceased. The ground cover should be of sufficient density to have 70 percent coverage within 90 days of planting and all times thereafter.

G

7) Page 5.2-7, Impact AQ-2, Paragraph 2, line 5: delete "to an acceptable level" and replace with "to prescribed levels."

H

8) Page 5.2-7, last paragraph: APCD staff does not agree with the last paragraph, which states "The estimated emissions probably are over-stated." Most vehicle emissions occur during start-ups and, to a lesser extent, during cool down. With the new campus, all motor vehicle start-up and shut-downs will occur within Ventura County. There also will be numerous other trips associated with the campus that do not now occur, such as service deliveries, special events on campus, and students traveling off campus. Therefore, the vehicle emissions probably are not overstated. Additionally, do the estimated emissions take into account motor vehicle trips associated with the proposed golf course, banquet facility, maintenance vehicles, gardening equipment, trash hauling, and deliveries? Paragraph 3, line 1, Table 5.2-3 shows air emissions not "traffic emissions."

I

9) Page 5.2-8, Mitigation Measures: Many of the mitigation measures the District suggested during the NOP process do not appear in this document. All should be reconsidered for inclusion in the final EIR. District staff recommends the following revisions be made to this section:

- AQ-2(c) should read: "New structures should be oriented to facilitate the use of passive solar energy and existing structures should be retrofitted to use solar energy, if feasible."
- AQ-2(d) should be replaced with a mitigation measure that recommends the University provide funding for clean-fuel transit shuttles between the campus and Camarillo.
- All campus vehicles should be clean-fuel or electric-powered.
- Include a mitigation measure that calls for the University to fund and implement a utility equipment exchange program to compensate for the air emissions generated by this project.
- Include a mitigation measure that calls for the University to establish a Transportation Management Association (TMA) to coordinate on-campus and off-campus transportation needs of the facility, students, and employees.
- If the California State University Channel Islands Site Authority is enacted, District staff suggests that a portion of the tax revenue generated be used for programs that will reduce air emissions and mitigate the project's cumulative air quality impacts.

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J

10) Page 5.2-10, Mitigation Measures: Line 3 should read "*Section 5.10, Transportation and Traffic.*" However, the mitigation measures in Section 5.10 of this DEIR address traffic congestion and do little to reduce automobile trips in Ventura County.

K

11) Page 5.2-10, Effect AQ-4, Consistency with the AQMP: The AQMP consistency analysis in the DEIR was not done according to the procedures in the Guidelines. The base year used to forecast emissions for the most recent AQMP is 1990 and did not include a four-year college. Therefore, the AQMP emission forecasts do not account for the increase in on-site population associated with ultimate project buildout.

The previous hospital population of 7,000 persons is irrelevant to the discussion of AQMP emissions forecasts and should be deleted. As stated in the DEIR, by the 1990s, the patient population dramatically decreased from the all time high of 7,000, and by June 1997, all patients had been removed from the site. The section entitled "Mitigation Measures" is not relevant to the discussion of AQMP inconsistency.

L

12) Page 5.2-11, Significance After Mitigation: The population forecast for the most recent AQMP did not account for a four-year college in Ventura County. Therefore, the project is inconsistent with the AQMP, resulting in a significant cumulative adverse air quality impact. The AQMP has never been revised to accommodate a specific project. However, when the next AQMP revision occurs, the plan could be amended to accommodate the University and eliminate the project's inconsistency with the AQMP.

M

13) Page 5.2-11, Cumulative Impacts: This analysis should be redone in accordance with the AQMP Guidelines procedures. Are the cumulative impacts considered significant and unavoidable after mitigation?

N

14) This project may be subject to the federal Transportation Conformity and General Conformity regulations. Section 176[c] of the federal Clean Air Act requires that the U.S. Environmental Protection Agency (EPA) develop criteria and procedures for determining the conformity of transportation and non-transportation (general) projects that require federal approvals for funding with the applicable air quality plan. In Ventura County, the applicable air quality plan is the Ventura County Air Quality Management Plan. The EPA promulgated its transportation conformity regulation on November 24, 1993, and the general conformity regulation on November 30, 1993. The federal agency that permits, licenses, funds, or has approval authority for a project subject to the conformity regulations is responsible for making the required conformity determinations.

The air quality section of the EIR should include a summary of the federal Transportation Conformity and General Conformity regulations, any actions related to the project that may require conformity analyses, and any agencies that may be involved with the conformity determinations. If you have conformity questions, contact Ben Cacatian of the APCD at 805/645-1445.

CSZICJ

If you have any questions regarding these comments, please contact Janna Minsk at 805/645-1436.

Sincerely,

Richard H. Baldwin

Richard H. Baldwin
Air Pollution Control Officer

c: Tom Berg, County of Ventura Resource Management Agency
Kim Hocking, County of Ventura Planning Division
Scott Johnson, Air Pollution Control District
Chuck Thomas, Air Pollution Control District
Janna Minsk, Air Pollution Control District

CSZICJ

Letter 12

Commentor: Richard Baldwin, Ventura County Air Pollution Control District

Date: July 16, 1998

Responses:

A. Comment noted. The statement is factually correct. It is relevant in that the AQMP forecasts did not consider the residential population that formerly existed at the site.

B. Comment noted. The EIR statement is derived from Section 109 (B)(1) of the Clean Air Act, which states: "National primary ambient air standards ... shall be ambient air quality standards the attainment and maintenance of which in the judgement of the Administrator, based on such criteria and allowing an adequate margin of safety, are requisite to protect the public health." The text of the second sentence is grammatically correct and understandable. The end of this paragraph will be appended to include mention of the nearest off-site sensitive residential receptors.

C. APCD recommendations are noted herein for the decision-makers.

D. Text modification noted.

E. "Various air pollutants" are identified in the second sentence of this paragraph. See Section 3.7 and Table 5.4-1 of the EIR regarding which buildings are to be demolished. Several of the buildings in the West Campus area and the original Employee Housing have asbestos at varying levels that would need to be removed. Text in paragraph 4 is clear without the suggested changes.

F. Comment noted. The mitigation measure already includes the use of dust stabilization techniques.

G. Comment noted. "Prescribed levels" are those that the APCD have set at a regulatorially "acceptable" level.

H. Comment noted. The APCD is in error regarding the location of vehicle start-up and shutdowns. This campus is expected to serve not only Ventura County, but Santa Barbara County as well, and a certain number of commute trips from Los Angeles County can be anticipated. About 20% of the students that attend the existing OCC currently commute from out of Ventura County. Both the initial start-up, engine warm-up, and final shutdown of the complete home-to-school commute for these students occur outside of Ventura County. The other trips (service deliveries, students off-campus, trash-hauling, off-campus maintenance vehicle travel, etc.) discussed in this comment are included within the trip generation factor used to compute the mobile air pollutant emissions because this generation factor is based on driveway entrance and exit surveys and not on the type and nature of the vehicle. "Special events" are a negligible contributor to the annual mobile air pollutant emissions inventory, as are the

effects of local maintenance vehicles and gardening equipment. The latter are already a part of the air pollutant emissions that occur within the County since the State has been maintaining these facilities for more than 60 years. The word "traffic" will be changed to "mobile source pollutant" in the Final EIR.

I. Comment noted. The mitigation measures submitted by the APCD during the NOP process were duly considered for feasibility and effectiveness and the Draft EIR text reflects those that were determined to be most applicable and effective at reducing air pollutant emissions. Several of the APCD measures were land use features that are already part of the proposed Campus Master Plan, including such items as the provision of onsite retail and other services, which is intended to reduce off-campus trips. The retrofitting of historically significant buildings to incorporate solar heating is not desirable, nor necessary given the energy-efficient use of cogenerated steam heat. Use of clean-fuel transits is already incorporated within measure AQ-2(a). Text of the mitigation measures will be revised in part in response to this comment. Please see Section C of this report for these revisions.

J. Text revision to Final EIR will be made. Section 5.10.2.e includes suggestions for TDM measures that are directly applicable in reducing the air pollutant emissions associated with the mobile sources of the proposed Campus Master Plan. Mitigation Measure AQ-2(a) will be revised to require the design of the Trip Reduction Program to consider several of these measures (see Section C of this Final EIR).

K. As stated in the EIR, the AQMP consistency guidelines do not specify a methodology for institutional use, therefore, there is no applicable procedure to be followed. Given that the base year for the AQMP is 1990, it does, or should have, considered the State institutional use of the site as a hospital that contained a significant residential component (over 400 separate residential units, not including the dormitories for patients). Since consistency is based on the 1990 base year as stated in the comment, the discussion regarding the previous onsite residential population is a relevant fact, even if it is not used in the consistency finding statement. Comment noted regarding the "Mitigation Measure" section.

L. Comment noted. The findings of the APCD regarding consistency are the same as those stated in the EIR.

M. The APCD Guidelines do not contain a specific procedure for estimating cumulative emissions, rather it states that if the thresholds are exceeded, than a project has both an individual and cumulative impact. As stated in the text, the air pollutant emissions of the proposed Campus Master Plan even with all reasonable and feasible mitigation measures would have a significant and unavoidable air quality impact.

N. Comment noted. The proposed Campus Master Plan is not subject to Transportation Conformity regulations since it does not receive any direct federal funding and does not require approvals for such funding. As stated in the comment, if and at the time that a conformity determination is decided to be necessary for any portion of the project, it is

the federal agency that permits, licenses, funds, or has approval authority for that portion of the project that would need to make the conformity determination.

(13)

Subj: **Re: Draft EIR - CSU-CI**
Date: 6/29/98 8:15:30 AM Pacific Daylight Time
From: george_dutra@qmbridge.calstate.edu (George Dutra)
To: Secondpest@aol.com, rinconvta@aol.com (Steve Svete), noel_grogan@qmbridge.calstate.edu (Noel Grogan)
CC: LUVLUXMBRG@aol.com, pestiwatch@igc.org

6/29/98 8:10 AM

Thank you for your E-Mail, Deborah, I have forwarded your concerns to Steve Svete of Rincon Associates. Rincon is our consultants on the preparation of the EIR.

Date: 6/28/98 9:12 PM
To: George Dutra
From: Secondpest@aol.com
Dear Mr. Dutra;

Community & Children's Advocates Against Pesticide Poisoning, of Ventura County, is concerned that the EIR for the new CSU-CI campus has not addressed the issue of bringing a large number of students into an agricultural area that releases millions of pounds of toxic chemicals into the environment every year. Certainly, the full operation of the campus will have some negative impact on Ventura County. However, this may be a unique situation where the existing environment could have more of a negative impact on CSU students, staff and programs. State requirements might not mandate looking at this unusual condition but we hope you will decide to do so. CCAAPP would be happy to attempt to answer any questions you may have about this issue. 805-654-4186

Thank you for your consideration,
Deborah Bechtel
for Community & Children's Advocates Against Pesticide Poisoning

Letter 13

Commentor: Deborah Bechtel, Community & Children's Advocates Against Pesticide Poisoning

Date: June 29, 1998 (via Internet)

Response:

The Master Plan area is adjacent to active agricultural operation lands to then north, west, and south of the site. A number of row and orchard crops typical to Oxnard Plain are cultivated on these nearby properties It is likely that a range of pesticides and other production-related chemicals are used in association with agricultural activities.

The CalEPA's Department of Pesticide Regulations establishes regulations regarding agricultural chemical use. These regulations are designed to prevent pesticides from being used in such a way as to jeopardize or cause injury to others. Section 6614 of Title 3 of the California Code of Regulations reads as follows:

> *(b) Notwithstanding that substantial drift will be prevented, no pesticide application shall be made or continued when:*
>
> *(1) There is a reasonable possibility of contamination of the bodies or clothing of persons not involved in the application process;*
>
> *(2) There is a reasonable possibility of damage to non-target crops, animals, or other public or private property;*
>
> *(3) There is a reasonable possibility of contamination of non-target public or private property, including the creation of a health hazard, preventing normal use of such property.*

The Ventura County Agricultural Commission enforces these regulations through permitting and site investigation to verify compliance.

Restricted pesticides are those pesticides whose use is restricted by the CalEPA Department of Pesticide Regulations due primarily to the toxicity of the chemicals. Zinc can be applied as a foliar spray from the air by helicopters or by ground spraying. Because zinc is not classified as a pesticide, only general spray drift restrictions that limit the application to the property line apply. The Ventura County Agricultural Commissioner's Office sites no problems with applications of zinc (Buettner, 1998).

The most commonly used chemical on strawberry crops is methyl bromide. A soil fumigant, methyl bromide is typically used prior to the planting of strawberries. It has a decay rate of approximately 6 to 14 percent per day and is usually completely dissipated within 20 days. The USEPA has scheduled a phase-out of sales and production of methyl bromide in 2001. Use of existing stocks may continue until 2005, when the use of methyl bromide must end.

Methyl bromide has recently been publicized as creating nausea and other effects for residents adjacent to areas in which fumigation has occurred. A 100-foot setback between methyl bromide fumigation and proposed uses is required by the CalEPA Department of Pesticide Regulations. This buffer and other regulatory mechanisms pertaining to the use of agricultural chemicals (i.e., restrictions on drift) would be expected to reduce pesticide-related health effects to a less than significant level.

The land uses proposed in the Master Plan are all more than 100 feet from active agricultural production. Buildings are separated from these areas by landscaped areas on site, as well as by private and public roads: Camarillo Drive, the Santa Barbara Avenue extension, and Potrero Road.

Compliance with existing state regulations pertaining to the use of agricultural pesticides would be expected to reduce impacts to levels that regulatory authorities consider acceptable.

(14)

Date: 7/14/98 3:46 PM
From:
Dear Mr. Dutra,

I hope that you do continue to provide more University level courses and plan an appropriate amount of space to accomodate the learning & study needs of Ventura county & surrounding areas.

After returning from a month of vacation I heard some about the proposed expansion at the old Camarillo Hosp.
Has anything been decided yet?

A I have 2 important concerns.
1. As a registered voter & taxpayer, I do not believe that golf course is needed or appropriate.

B 2. I am very concerned about the conversion of more than 11 acres of prime farmland to be used for this project. Couldn't the space/ land needs be reasssessed?

Thank you, Kathy Brooks
PS Please do not give or sell my name or # to others.

CSUCI

Letter 14

Commentor: Kathy Brooks

Date: July 14, 1998 (via Internet)

Response:

A. The Master Plan includes residential and research and development space to address a State requirement that a university at this site be financially self-supporting. All of these uses will have some connection to the academic mission of the university. For example, some of the housing will be available to faculty, staff, and students of the university. Other senior care and assisted-living facilities may be associated with programs in public health and gerontological studies. The research and development leases will tie in to technology programs at the CSUCI, and will provide an employee base for part-time students as well as a continuing learning opportunity for other employees. The golf course could be part of the recreational and sports academic programs that may develop at the CSUCI, serve as recreational opportunity for the resident population, or both. The personal opinion of the commentor that it would not be needed or appropriate is noted.

B. The 11 acres of prime farmland that would be eliminated would result from the construction of the Santa Barbara Avenue extension and the widening of Camarillo Drive, both of which may be required in the future to address vehicle traffic demand and adequate site access. The total given represent a worst-case scenario directly related to the proposed campus access. If trip numbers do not warrant the expansion of roadways, or if roadway standards are modified in a way that would alleviate right-of-way dedication needs, all of the roadways may not be built at the width assumed in the EIR and this amount of acreage would not be required for roadway dedications. In addition, other road widenings in agricultural areas may be needed as a result of campus and cumulative growth. These widenings are not expected to exceed an additional 20 acres. The proposed project is subject to a range of other mitigation measures that would otherwise safeguard agricultural properties near the campus. Please review mitigation measures in Section 6.0, *Long Term Effects*. In addition, use of the project site for the proposed CSU campus would eliminate the need to convert the already approved 260 acre Orchard Site from agricultural use to educational use, as discussed in Section 7.0 *Alternatives*.

(15)

Comment Sheet

Please provide any input on the analysis presented in the EIR...

Name: Arla B Crane

Affiliation (optional): Resident, Teacher, Bd Member
(resident, businessperson, community group)

Address: 1617 E. Rowland Ave
Camarillo, Ca
93010

Phone: 482-9397

We are pleased with the plans to establish a university on the Hospital site. We feel the EIR needs to expand its plans for traffic abatement in the following ways:

A

1. Establish bike paths for non-motorists
2. Give preferential parking to electric-powered vehicles
3. Give preferential parking to carpools
4. Individual parking permits for gas-powered autos at $35.00 per day.
5. Re-establish a "Red-Car" service as LA once had.
6. Copy, where feasible, the "Getty Center Model." for transporting large numbers of people

We share the concerns of the Sierra Club. We applaud your efforts to have free bus passes. This alone will not solve the parking "Crunch."

Again, we feel students, teachers, books, libraries, and programs are not the problem. This area can absorb all of these entities with little impact on the environment. The enemy is the gas-powered auto.

CSUCI

Letter 15

Commentor: Arla B. Crane

Date: July 21, 1998

Response:

A The commentor suggests a number of measures that would address traffic and associated air quality problems. Mitigation Measure AQ-2(a), inlcuded in Section 5.2, *Air Quality*, requires the preparation of a Trip Reduction Program. In *Transportation/Traffic* Section 5.10.2.e., *Transportation Demand Management*, a list of trip reduction strategies is included that may be considered, which encompass suggestions presented by the commentor. The utilization of parking fees and/or "Red Car" services, etc., are additional measures the commentor recommends to be considered by the University. The University will develop a parking fee program that includes incentives to reduce vehicle miles traveled on a per person basis. The parking fee program, however, will also nee to be consistent with providing reasonable access to students and visitors, meeting revenue bond obligations, and other financial needs connected with State policy that parking be self-funded. "Red Car" services, namely light rail transit, is not available in Ventura County nor are there any plans for such to be implemented in the forseeable future. Heavy rail transit, namely MetroLink and Amtrak, is available at Camarillo.

In order to clarify the intent of air quality Mitigation Measure AQ-2(a), improve its effectiveness, and to address this comment, this measure will be revised to require that the Trip Reduction Program initially evaluate those optional strategies that appear most feasible and include them within the plan. A list of these strategies will be included in the mitigation measure. Also, Mitigation Measure AQ-2(a) has been revised to include a requirement for annual review of the program. This would facilitate the timely incorporation of new strategies as they become feasible. Please see Section C of this report for the revisions to this measure.

ENVIRONMENTAL COALITION

(16)

7/21/98

Rincon Consultants, Inc.
for California State University, Channel Islands

Comments to the Draft Environmental Impact Report for
California State University, Channel Islands
Campus Master Plan
dated June 4, 1998

A | A primary concern is that the University does not treat this Program EIR as the final public discussion and disclosure of information regarding building on the future University site. Rather, this should be a first conversation in the ongoing discussion of what the University is developing at this site.

We have serious concerns of the potential volume of development for this site and in turn the potential impacts on the surrounding area. This Program EIR list a smorgasbord of potential structures and associated businesses. If a lot of these are build, especially the commercially driven such as unrelated housing, service businesses and semi-related businesses (already existing in nearly Camarillo); it could result in serious impacts here and in the adjacent area due to the excessive numbers of people, traffic, etc.

B | It is important, that as the University site is developed; that the unrelated housing, associated businesses, commercial buildings and activities, as well as major University structures and development revisit the CEQA process including disclosure and individual EIRs.

C | The University needs to continue to impart information and engage in public discussion with the larger Ventura County community. Each time, discussions need to look at what is good for the whole community. Decisions should not just be driven by this campus' unique mandate to generate commercial money - unlike all the other California state campuses. Trying to generate commercial moneys could push the development of this campus out of control beyond the capacity of this site and the adjacent areas. This

CSUCI

site would not support a large scale development - trying to be all things to all the occupants. It is important to remember this is to be the site of a new university - not the next new city in Ventura County.

C

This site and the adjacent area are bound by other important uses - that need to be protected and enhanced throughout the development and life of the future University, including;

agriculture
nearby parks and wildlife habitats
Calleguas Creek.

D

It is encouraging to see discussion of renovation and reuse of the existing structures. This has value environmentally, financially and historically. We hope that this in fact, becomes a reality.

E

The Program EIR has still not provided a discussion of the site, the future University and other uses' Water Rights under California Water Laws. In a future drought & through time, this will be a critical issue. This is not about what is available today, rather the future. And, is especially critical regarding unrelated and only semi-related activities to the University.

F

To quote this EIR ..."The ancillary uses that are not directly part of the University may be considered inconsistent with policies of the Ventura County General Plan and the Guidelines for Orderly Development..." The acknowledged special status of the University should not convey carte blanche to build unrelated or inappropriate developments that will seriously impact the adjacent area.

For the Board,

Janis McCormick

Letter 16

Commentor: Janis McCormick, Environmental Coalition

Date: July 21, 1998

Response:

A. The commentor expresses the concern that the Campus Master Plan Program EIR not be treated as the final public discussion of the university site, but rather the opening of an ongoing discussion about onsite development. The comment is noted. If the Campus Master Plan were approved, it would represent the vision for the long term development of the campus area. However, individual building approvals developed over time will be subject to independent environmental review under CEQA. If the program EIR has not contemplated and analyzed such future development in enough detail, or if information becomes outdated, or if plans change in such a way that they are no longer consistent with what has been analyzed in this EIR, new environmental review under CEQA may be warranted.

The Program EIR for the Campus Master Plan includes a discussion of the impacts associated with buildout of the housing, office, and retail services that would be located within the project site. Section 6.1 of the Program EIR specifically addresses the growth inducing impacts of the proposed project on the adjacent area.

Apart from the CEQA process, the CSU has already initiated involvement and will continue to grow in its involvement in questions of regional planning importance. For example, the CSU has been involved in discussions with the County and the City of Camarillo, and will be a partner with the County and other local governments in the Site Authority if that entity is enacted by the State legislature. The CSU has recently joined the discussions involving the Calleguas Creek Watershed Management Plan. Finally, the CSU has initiated cooperative dialogue with Ventura County Transportation Commission regarding transit and trip reduction strategies, and with open space management agencies regarding open space and habitat conservation. In short, community dialogue, which has been facilitated by this EIR process, can be expected to grow over time.

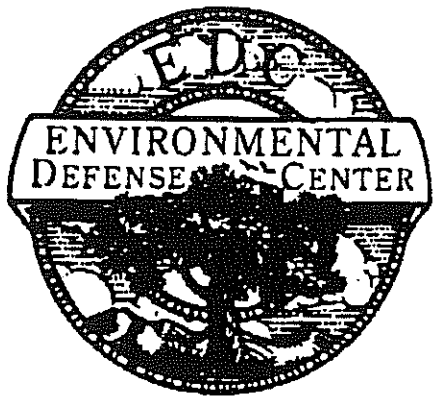
B. Please see the response to comment 16A. When discretionary actions, such as major building or infrastructure construction, that may have an adverse effect on the environment are undertaken by the CSU or the Site Authority subsequent to the certification of this program EIR, those actions will be subject to the CEQA process. If this program EIR has not adequately contemplated and analyzed the potential impacts of those projects, supplemental review may occur. While this will involve the CEQA process, it will not necessarily require individual EIRs for each portion of the site. In general, the applicability of a program EIR diminishes over time, as background environmental conditions, regulations, and project plans change.

C. The commentor expresses the opinion that engaged discussion with the Ventura County community is necessary despite the unique mandate to be self-supporting financially. The commentor reiterates the importance of protecting and enhancing surrounding uses such as agriculture, wildlife habitats, and Calleguas Creek. The comment is appreciated and is noted herein for the decision-makers.

D. The commentor states the opinion that it is encouraging that the project involves extensive reuse and renovation of existing facilities. The comment is noted for the decision-makers.

E. The issue of water supply was discussed in the Initial Study, page 13, Section XVI, *Utilities and Service Systems.* The issue of supply was determined to be less than significant based on an infrastructure assessment by Psomas and Associates and discussions with Camrosa Water District, the local supplier. Please review the letter from Camrosa Water District and the responses thereto, included as Letter 8, above. The State possesses ground water rights and could legally pump and treat its own supply, though it does not presently intend to do so.

F. The CSU, as expressed in the Campus Master Plan and its current leasing activity, is committed to use the site in a way that complements and enhances the educational mission and provides financial support for the university. The Board of Trustees and the Site Authority will be charged with regulating development at the site. As addressed in the response to comments 16A and 16B above, any definitive deviation from the Campus Master Plan will be subject to CEQA review and the accompanying public oversight.



(17)

July 21, 1998

George Dutra
California State University
P.O. Box 2862
Camarillo, CA 93011-2862

VIA FACSIMILIE AND US MAIL

RE: Draft Program EIR for the California State University, Channel Islands Master Plan

Dear Mr. Dutra:

Thank you for the opportunity to comment on the Draft EIR for the California State University, Channel Islands Master Plan.

Project Alternatives

A The State CEQ Guidelines require alternatives to be limited to those which would avoid or substantially lessen any of the significant effects of the proposed project , even if those alternatives could impede attainment of all project objectives or be more costly. [Guidelines Sec. 15126(d)(1)&(5)]. Furthermore, as the subject EIR states, the evaluation of alternatives should focus on the comparative merits of the alternatives relative to the proposed project for each environmental issue. It seems clear that the three alternative sites were not chosen primarily to substantially lessen any of the significant effects of developing the preferred site. Conversely, it appears that the alternative sites could result in *greater* impacts overall (regarding agricultural land conversion, aesthetics, geology/soils, air quality, traffic, and growth inducement) as compared with the preferred site. This conclusion is somewhat unclear, however, as the impact analysis of the three other sites were not compared to those of the preferred site. Such "straw man" alternatives do not conform with the fundamental purpose of CEQA.

B The EIR includes an alternative Master Plan concept of deleting the proposed 9-hole golf course. For the purpose of reducing water quality, biological resources, and water quality impacts, we strongly urge the elimination of the golf course from the project. A recreational golf course is completely unnecessary for development of a university. Alternatively, the area should be left as open space with a guarantee that it be left so in perpetuity. Perhaps a network of low impact bicycle trails could instead be added to support an alternative campus-wide transportation access. By not developing a golf course, land would become available upon which biologically valuable coastal sage scrub habitat could be restored.

C We furthermore urge consideration of an alternative that eliminates ancillary, revenue-generating development from the project to minimize unavoidable significant impacts. As revenue generation is stated as a project objective, and the proposed method of generating the revenue (via development of the site) would in itself create significant impacts, other alternatives for meeting

CSUCI

C

the revenue-generating objective should be more carefully scrutinized. It also appears that at least some of the proposed ancillary uses may be infeasible given the relative remoteness of the site. Is it wise to locate a congregate care facility approximately six to ten miles (along mostly rural roadways) from the nearest hospitals in Camarillo and Oxnard?

D

Air Quality Impacts

We strongly oppose VCAPCD's practice of classifying any project's construction emissions as temporary and thus essentially exempt under CEQA. Temporary emissions of ozone precursors contribute significantly to Ventura County's ozone problem, individually and cumulatively. There are a number of mitigation measures which should be required to offset the emissions associated with project construction. These include emissions offsets from the VCACD emissions bank, the VEMP program, use of clean fueled heavy duty and light duty construction equipment, etc. Temporary emissions should be considered significant and mitigation should be required.

E

The project's inconsistency with the AQMP has significance beyond CEQA. The AQMP is the basal planning document for air quality purposes, thus, any project inconsistency confounds Ventura County's progress toward attainment of the health-based state and federal ambient air quality standards. Offsetting emissions reductions for any project emissions, from both the construction and operational phases, must be required. If this is not feasible, other emissions reductions strategies must be pursued. AQMP inconsistency will furthermore prevent CSU from obtaining federal, and possibly state, funding due to conformity requirements of Sec. 176(c) of the Clean Air Act.

F

The EIR notes that the AQMP emission forecasts may already account for the increase in on-site population associated with the proposed project because the previous hospital use serving and on-site population "...as high as 7,000 (patients in addition to)...(a) number of staff" (p. 5.2-11) was included in the AQMP. Although this "offset" is not actually credited in the emissions analysis, it is used to imply that the emissions impacts from the proposed project are overstated (and actually even lower overall than the emissions generated by the hospital use during its peak use). The assumption used to quantify maximum hospital-generated emissions cannot be based upon overall population, however. Because few, if any, of the 7,000 patients drove vehicles, the whole paragraph is inaccurate and thus should be deleted from the Draft EIR.

G

Aesthetic Impacts

The photographs representing the existing visual character of the project vicinity do not allow for a contextual pre- and post- project comparison. Without a visual representation of the proposed project (i.e., line of sight artist's renderings) it is impossible for the public and decision makers to understand the extent of potential visual impact from the project. As such, it is difficult to judge whether the proposed mitigation measures would reduce aesthetic impacts to less than significant.

H

Proposed mitigation measures pertaining to proposed campus development are inconsistent in scope, redundant and/or somewhat contradictory. Some measures (AES-1(g), (h) and (i)) apply to specific structures and others (AES-2(a), (b) and (c)) apply to all structures. At the master planning level, mitigation (such as that pertaining to height limits, setbacks, architectural standards, reflectivity, massing, etc.) must apply to the overall campus. As such, we recommend integration of the above referenced measures into a comprehensive campus development standards plan to ensure that mitigation for visual impacts is applied uniformly and consistently across the full project. If the CSU does not succeed in gaining "site authority" status, it seems that the County would share authority regarding development standards. As such, has the County agreed to the stated mitigation measures?

I

Placing a traffic signal/turning lanes on Lewis Road at the intersection of Santa Barbara Road extension and widening Camarillo Drive to four lanes with traffic signals would significantly alter the existing rural character of the area. As envisioned for the residential areas of the campus (p. 5.1-19), every effort should be made to utilize alternative traffic calming mechanisms in lieu of traditional traffic controls throughout the entire project including the adjacent access roads. Furthermore, if CSU is truly serious about featuring mass transit, the campus circulation design should hinge upon mass transit being the primary means of transportation to and from the campus. As such, the need for road widening may be eliminated.

J

The EIR concludes that the aesthetic condition in the vicinity of Calleguas Creek on the southeastern edge of the Oxnard Plain is not expected to "undergo major (cumulative) changes within the buildout period of the Master Plan..." (p. 5.1-20). This conclusion is unwarranted. No analysis was included regarding the adverse cumulative aesthetic impact that would result from implementing the mitigation measures which recommend extensive road widening in the region surrounding the project site, as required by CEQA (Guidelines Sec. 15126(c)). The seriousness of such a deficiency is significant given the rural character of the surrounding area which is dominated by two-lane farm roads. Together with the EIR conclusion (p. 5.1-20) that the cumulative changes to the Lewis Road corridor would be significant, mitigation measures must be proposed or a conclusion of unavoidable cumulative aesthetic impacts must be made (Guidelines, Sec. 15130).

K

Mitigation measures which call for one-for-one replacement for tree removal should be modified to require at least a two-for-one replacement. A size-equivalent requirement should also be included. Increasing the net number of trees will at least partially compensate for addition of the proposed structures.

L

Transportation/Traffic Impacts

Although we understand that the details of campus development are still in the conceptual stage, preliminary planning seems to focus on serving single occupancy vehicles. Although CSU has frequently referred to the use of alternative transportation, the EIR contains few specifics which require any level of binding commitment. The discussion of alternative transportation measures (p 5.10-30), for example, is merely a laundry list of recommendations rather than enforceable mitigation measures. The Air Quality mitigation measures include the requirement for a Trip Reduction Program incorporating van and car pools. However, the California Clean Air Act was amended in 1995 (SB437) to sharply curtail the ability of public agencies to require employee trip reduction programs. Please comment on the authority of CSU to impose trip reduction as a mitigation measure. Lastly, what impact would happen if CalStart ultimately chose not to locate at the site or decided to leave at some future date? Would CSU still pledge to commit the necessary resources to ensure mass transit is facilitated?

M

Biological Impacts

Mitigation measures which rely on deferred consultation to "control" (Measure BIO-1(a)) potential impacts could be considered inadequate under CEQA [Sundstrom v. County of Mendocino (1988) 202 Cal.App. 3d 296]. Combined with the fact that no measurable performance standards are included, the adequacy of the biological mitigation is questionable. At the very least, CSU should secure, as a current mitigation measure, a commitment from all interested conservation groups and the National Park Service to actively participate in the preparation of the future biological mitigation plan.

N According to the EIR, $10.9 million is available to the Wildlife and Conservation Board to acquire coastal sage scrub and other habitat. We strongly recommend that CSUCI work with parkland acquisition agencies to use the available funding to secure adjacent private land adjacent to the campus. The entire eastern edge of the proposed campus site borders Point Mugu State Park and is as ecologically pristine as the adjacent parkland. From a geographical standpoint, it is acquiring adjacent lands would be a logical extension of the existing Santa Monica Mountains open space preserve.

O As acknowledged in the EIR, the open space areas to the northeast of the core campus supports several sensitive plant species, a mitigation measure should be included to prohibit access to open space areas except via established trails. This measure could be accomplished by posting signs, campus-wide education campaigns, etc. As a suggestion, CSU should commit to producing and distributing a brochure to all campus users on how to avoid human induced impacts to local biota.

P A comprehensive campus wide landscape plan should be developed in consultation with the biology department to ensure compatibility between native open space plant species and any non-native species. The landscape plant palette should also be chosen with sensitivity to wildlife that may traverse areas of the site. All night lighting spill-over should be identified and mitigated to prevent any illumination of native open space and buffer areas.

Q The EIR states that the East Campus area design includes a "*minimum* of 100 feet wide (landscaped buffer)...between the residences and...adjacent natural vegetation" (emphasis added, p. 5.3-21). Measure BIO-5 requires fire sprinklers in buildings "which (are) located *within* 100 feet" of undisturbed coastal sage scrub. Not only are the above two excerpts inconsistent, the mitigation measure would <u>not</u> eliminate the need to remove sensitive vegetation, as stated. The use of fire sprinklers does not exempt the requirement for a 100 foot brush clearance zone.

R Several groves of coast live oak trees are located east of Camarillo Drive, which is proposed for possible widening. The EIR references Ventura County Zoning Ordinance provisions which regulate the treatment of oak trees, but it is unclear whether the County's regulations would apply to the removal of any oak trees. If the County oak protection provisions would not apply, mitigation measures should be included to address any potential impacts regarding oak tree removal.

S <u>Land Use Impacts</u>
The impact analysis regarding land use policy inconsistencies fails to recognize the precedent-setting, indirect County-wide impacts of amending the general plan definition of "State or Federal Facility" and weakening the Urban Centers policy. Altering the General Plan policies to accommodate the CSUCI proposal may, at the very least, allow development of private urban uses on other state/federal lands in Ventura County. CSU should specifically commit to analyzing indirect impacts in greater detail either in the subject EIR or the Specific Plan EIR.

T The EIR concludes that the impacts regarding compatibility conflicts with adjacent agricultural uses is less than significant. Due to the proximity of the proposed school and day care center to the adjacent to an agricultural field, additional analysis should be conducted regarding toxic pesticides/herbicides used in relation to type, quantity and method of application (i.e., aerial spraying) used in the vicinity. It is a generally accepted fact that the effects of toxic chemicals is greater children due to their smaller body mass and greater sensitivity to cell-damaging impacts. The analysis should disclose potential health risks from all chemicals to which children would be exposed.

T

In particular, methyl bromide should be addressed. Methyl bromide is a deadly neurotoxin used to fumigate agricultural soils to support certain crops. There is considerable disagreement as to the effectiveness of existing regulations (i.e., minimal buffer zone requirements) to protect public health. If methyl-bromide using crops are likely to be grown on adjacent fields during the life of the project (or until it is banned as currently planned on January 1. 2001), we recommend relocating the school and day care center farther from the agricultural fields to assure an added margin of safety.

Thank you for your attention. We look forward to your responses to our concerns.

Sincerely,

Kim Uhlich, Environmental Analyst

CSZICJ

Letter 17

Commentor: Kim Uhlich, Environmental Defense Center

Date: July 21, 1998

Response:

A. The EIR includes an analysis of two versions of a no project alternative, three alternative site alternatives, and four alternative master plan concept alternatives; a total of nine alternatives. The commentor states that the inclusion of the three alternative sites was not useful, since impacts were generally greater than those of the proposed project.

The EIR preparers and CSU officials disagree. In practice, alternative sites are especially apropos to include in EIR evaluations when the project is being proposed by a public entity. This is true for several reasons. First, public agencies generally have broad locational flexibility in implementing projects whose primary purpose is to provide a public service when that client group is broadly distributed geographically. The client base for the proposed project is the population of Ventura County and the South Coast of Santa Barbara County. In addition, the campus is part of a State agency serving all of the State. Therefore, it is useful to evaluate alternative sites that may better serve the community's needs. Second, the CSU already owns one of the alternative sites and purchased it specifically to develop a university. This 320-acre site, the Chaffey/Duntley site and evaluated in the EIR in Section 7.2.2, has already been the subject of extensive environmental review (as had the other two alternative sites) in a 1991 EIR (which was incorporated by reference into this Program EIR). The analysis of these three sites, and particularly the Chaffey/Duntey property (also referred to as the Orchard Site), serves a legitimate community interest inasmuch as it allows the public and decision-makers to compare the currently proposed project to one that had heretofor been pursued and approved. To omit this and other sites from the alternatives evaluation in this EIR would have been irresponsible. Third, numerous letters that responded to the Notice of Preparation expressed concerns about growth-inducing impacts and effects to agricultural lands. Since these issues are locationally driven, it seems prudent to evaluate alternative sites that might have better accommodated these concerns. It is noted that the 1991 EIR contained an analysis of several other alternative sites, and as explained in Section 1.1 of this Program EIR, the CSU previously considered a total of 40 sites for the location of this campus.

B. The commentor agrees with the analysis in the EIR that the Alternative Master Plan Concept – No Golf Course, evaluated in the EIR in Section 7.3.2, is superior to the proposed project in several areas. It is noted that the golf course would serve as a revenue-generating use and so would aid in meeting an important objective for this campus, as discussed in the EIR. Please also see response to comment letter 14A, above. The commentor suggests that a bicycle trail within the buffer area would be a better option. It is expected that a bicycle master plan will be developed for the campus in the future.

C. The alternatives analysis has included two alternatives that address the commentors concern about the revenue generating uses proposed at the site. Section 7.3.3, *25,000 FTES University Campus*, analyzes an alternative that would not involve the development of revenue-generating uses. But because it is not realistic to assume that the East Campus area would remain unused - particularly in its developed state — this alternative analyzed use of that area to accommodate the expanded University population. During public input opportunities, numerous community members suggested a university-only option. Please review the analysis of this alternative. The EIR concludes that such an option would have a far more detrimental impact to transportation, because the complementary land use mixes enabled under the proposed project would not occur, thereby forcing an imbalance in land uses and increasing off-site trips. Section 7.3.4, *No Redevelopment of East Campus*, analyses a situation where no new construction would occur, but buildings would be reoccupied. Though these uses would likely be revenue-generating, they would be restricted to the level of activity that has historically occurred at the site. No other options for revenue generation beyond some form of site development have been suggested.

With respect to hospital access, it is assumed that congregate-care or assisted living facilities would be accompanied with some medical support facilities and personnel. The distances presented by the commentor do not seem extraordinary or unusual for emergency hospital trips from many areas, and the majority of the trip to either St. Johns Regional Medical Center in Oxnard or St. Johns Pleasant Valley Hospital in Camarillo would be along relatively high-speed State Route 34.

D. The commentor states that the EDC strongly opposes the Ventura County Air Pollution Control District's approach to construction-related emissions. This fact notwithstanding, the EIR has included a range of dust and ozone precursor mitigation measures. Please review Mitigation Measures AQ-1(a) and (b) in Section 5.2, *Air Quality*.

E. Commentor expresses the opinion that inconsistency with the AQMP goes beyond CEQA issues and states that offsetting emissions are required. It is noted that offset requirements are associated with stationary sources rather than mobile sources, which are the primary source of air pollutant emissions associated with the proposed project. The Draft EIR provides mitigation measures that are intended to reduce the proposed Campus Master Plan impacts on air quality. Mitigation Measure AQ-2(a) has been modified to delineate those optional strategies that appear to be the most feasible and effective for reducing trips and thereby decreasing air pollution emissions. Please see Section C of this report for the text revisions. However, even with effective incorporation of these measures, mobile emissions associated with build-out of the campus would still exceed the Ventura County thresholds and air quality impacts will remain a significant and unavoidable consequence of the proposed project. It is noted that the CSU does not receive direct federal funding for development of the campus. Please also see response to Comment 12N above.

F. The EIR does not imply that the air pollutant emissions associated with buildout of the Campus Master Plan are less than that which were associated with the hospital. The EIR does state that air quality impacts are conservative and probably "over-stated" because the calculations include the initial start-up, engine warm-up, and final shutdown of the complete home-to-school commute for those students that will commute from outside of Ventura County. Please note that the proposed project is intended to serve Santa Barbara County (South Coast area). In addition, consistency with the AQMP for residential uses is based on the number of residences that are projected to be contained within the particular growth or nongrowth area of the County at time of project buildout. Given that the base year for the AQMP is 1990, it does, or should have, considered the State institutional use of the site as a hospital that contained a significant residential component (over 400 separate residential units, not including the dormitories for patients). Since consistency is based in part on residential population, the discussion regarding the previous onsite residential population is a relevant fact, even if it is not used in the consistency finding statement.

G. The proposed project is a Master Plan for which a program-level analysis has been prepared. A major component of the initial use of the campus will be accommodated by adaptively retrofitted existing buildings, whose exterior appearance would not change. No new buildings have been designed. It would be inappropriate, in our opinion, to model structural massing and imply post-project visual conditions. Instead, Section 5.1, *Aesthetics*, attempts to convey an understanding of the aesthetics of the site, and how particular areas in and around the site would change visually. Please see response to comment 10L above, which reviews the *State CEQA Guidelines* section regarding level of detail and use of speculative analytical techniques.

Only one respondent to the February 1998 Notice of Preparation raised the aesthetic issue. That respondent, the County of Ventura Planning Division, asked that the EIR analyze the visual effects to Lewis and Potrero Roads, which the County has identified as candidate scenic highways. As pointed out in the EIR, the current views of the campus from Lewis Road are only available of the campus core area, and they are distant views. New development would not be discernibly different. Instead, access road modifications at Camarillo Drive and the Santa Barbara Avenue extension would result in visual changes. These are addressed in the document. Potero Road views are foreground views of existing buildings that will remain. New parking facilities would change the visual effect, but not significantly alter massing profiles. Please review Mitigation Measures AES-2(a) and AES-3(a).

H. The structure of the mitigation measures is designed to clarify special requirements for structures where it was determined that special mitigation is warranted. The overall measures, AES-2(a) through (h), would apply to the East Campus area. The area is yet to be designed, but the measures will serve as guidelines to the master planners. The County has reviewed the Draft EIR, and has commented extensively on the document. The County has not commented on Section 5.1, *Aesthetics*. It is assumed that the physical design mitigation measures meet their concerns.

I. The commentor agrees with the conclusions in the EIR that new road construction, widenings, and signalization would alter the aesthetic character of the area. Please review Mitigation Measures AES-2(e) and (f). The need for roadway augmentations and signalization will be closely monitored prior to implementation. If trip reduction strategies required as part of mitigation measures in this EIR are successful in significantly curbing trip volumes, not all of the augmentations and signalizations may be necessary and would not be completed.

J. Mitigation measures have been proposed to alleviate the impact of roadway modifications in the vicinity of the project, and the conclusion in the EIR is that the proposed project would contribute to significant changes to aesthetic conditions in the Lewis Road corridor.

K. The mitigation measure for tree replacement is considered to be sufficient to mitigate any loss of trees due to building activity. It is important to note that a size-equivalent clause may not be a plausible or desirable idea. Young trees have a much higher survival rate, because they can better weather the transplant process and their root systems can better exploit ambient soil characteristics. For this reason, such considerations are best left to a qualified landscape architect. In addition, the State has an established practice of preferring to plant young trees for economic reasons (lower cost). Please review Mitigation Measure AES-2(d) and (g).

As a separate matter, the commentor's assumption that new structures will create an aesthetic condition that is automatically adverse or requires compensation is not shared by the EIR preparers. Well-designed new structures can aesthetically enhance an existing site, as has been demonstrated in many cases around the state at existing campus settings. Such a point illustrates the subjectivity inherent in aesthetic analyses, as explained in the introduction to Section 5.2, *Aesthetics*.

L. The DEIR identifies potential traffic impacts and recommends mitigation measures based on a reasonable worst-case analysis of vehicular trip generation at the site. While the implementation of transit service and TDM strategies will reduce traffic generation at the site, the roadway and intersection improvements outlined in the document will likely be required in the future. The mitigation monitoring program developed for the project will continue to monitor traffic at the site to determine the actual extent and timing of the traffic-related improvements required.

M. The mitigation measures for biological impacts are not deferred; they are direct actions to be taken that if implemented can serve to retain the important biological characteristics of the site. The level of mitigation recommended within the EIR is appropriate for the level of specificity presently known for the development of the site, namely that of a Master Plan. Until specific design details for campus areas are known, detailed biological mitigation planning can not be accomplished. In addition, the proposed Master Plan would set aside almost all of the sensitive hillside vegetation within an open space designation.

N. The eastern edge of the proposed campus site does not border Point Mugu State Park; it is the private landholdings on the east and south side of the campus that border on the park. The recommendation that CSU should work to help parkland acquisition of adjacent open space is noted to the decision-makers. Mitigation Measure G-3 also addresses this issue.

O. As stated in the EIR text, access into much of the coastal sage scrub habitat within and adjacent to the campus is highly limited by the steepness of the terrain, the density of brush, and the presence of extensive stands of cactus. Nonetheless, a mitigation measure as suggested has been added to the EIR text.

P. Comment noted. Section C of this report includes a suggested mitigation measure to be considered by the CSU Board of Trustees in its deliberations regarding this project. It is noted that the project site is already well lighted by night illumination that extends into adjacent open space area; nonetheless, these open space areas still have significant wildlife populations.

Q. The two statements are not inconsistent. The first discusses the design of the East Campus land use pattern in which a buffer zone has been included that would surround the residential component in this area. The second statement concerns specific existing buildings located in the campus core as discussed on page 5.3-21 of the EIR text. Because the property is state land, County Fire Protection Services requirements that would apply to other areas have not been fully applied within the project site. Therefore, native coastal sage scrub vegetation, some of it including the rare Conejo buckwheat, is within 100 feet of existing structures. The requirement for fire sprinklers is expected to allow the issuance of a waiver for those specific buildings.

R. No current plans are present for the removal of any mature oak trees within the project site. As stated in the EIR text, the trees that are adjacent to Camarillo Drive are planted trees and would be considered landscaping features that are not subject to the County Tree Protection regulations. Only those trees that are within groves that are ecologically functioning as woodlands have a greater ecological value than the other landscaping trees, and these groves are not within the potential right-of-way for Camarillo Drive. Therefore, no additional mitigation is necessary at this time, though further measures could be imposed by subsequent environmental documentation when more specific development plans are proposed.

S. The EIR specifically discusses the issue of changes to the Federal/State facility designation that the County of Ventura may choose to do and includes a mitigation measure associated with such effects (See Section 6.1.3). The question of land use regulatory authority is still being resolved by CSU and County officials. As of this writing, the land is a State Facility, with the CSU responsible for its land use decisions. Strictly private, proprietary development on the site could be subject to local regulation. At the time of this response, legislation is pending which would provide for a Site Authority which would involve both the CSU and local government in various aspects of development and mitigation. With respect to impacts that may result from future activity, please refer to response 16A and 16B above. These responses clarify the

procedures by which the CSU would be required to further analyze future discretionary actions not contemplated in this program EIR.

T. Please see comment letter 13 and the response thereto.

Subj: Re: EIR CONCERNS of CSUCI
Date: 98-06-29 16:25:35 EDT
From: george_dutra@qmbridge.calstate.edu (George Dutra)
To: alysonk@west.net (Alyson Kaye)
CC: rinconvta@aol.com (Steve Svete)

(18)

Reply to: RE>EIR CONCERNS of CSUCI

Dear Ms. Kaye,
By copy of this response I have forwarded your concerns to Mr. Steve Svete, form Rincon Associates. Rincon is our environmental consultants who are preparing the EIR. Your comments will be addressed in our EIR.

I have also had conversations with some of your neighbors who share you same concerns.

Date: 6/29/98 12:11 PM
To: George Dutra
From: Alyson Kaye
George:
I am a Camarillo resident and homeowner and because of young children cannot attend Tues. EIR/open house at the proposed new campus,CSUIC.

I have read thru the traffic sections of the online EIR as I have been concerned about the impact. The increases in traffic are phenomenal as you know.

I live specifically in off at 3905 Pleasant Valley RD. in the Lamplighter Mobile home park between US 101 and Lewis RD. along the strawberry and lettuce fields.
While you do mention in your report the "4-land widening of Pleasant Valley Rd. north to the city of OXNARD" ,***

it is extrememly important that from LEWIS RD to the HWY 101 along Pleasant Valley Rd. that measures be taken to widen this already congested one lane strip road. **

It will be the first off ramp of choice for anyone coming from the L.A., The valley and Thousand Oaks area. This will be the bulk of attendees.

So that members of our community closest to the new campus can support this I ask you to please insists on :

1. This Pleasant Valley Rd. strip be widened as well

2. A traffic Light centered across the bridge at Via Rosal and Pleasant valley Rd. so that residents here can exit safely (right now it is nearly impossible with speeding and busy traffic each day)

Our Lamplighter Mobile home community is over 300 strong, we would love to support you with your assistance. Please let me know if we can expect this section of Pleasant Valley Rd. to be widened and traffic lighted.

It is my pleasure to be involved with the safety and enviromental impact of the new campus. I hope to acheive a position there as a Librarian and send my daughter there, as I am a graduate of CSUN.

I look forward to hearing from you. Please feel free to share my 2

concerns and recommendations to the Board, (even though, the city may say no signifcant impact that is ignorant and they need to be included to be ready for the TRAFFIC.)

I look forward to hearing from you shortly, email is ok if within the week (if my email changes I would appreciate a written home addressed or phone call response as well)

Sincerely,
Alyson Kaye, MLIS
Librarian and Information Specialist alysonk@west.net
St.John's Seminary- Theology Library home phone 805 389-0080
Camarillo, CA work phone 805 482-2755 ext. 164

Home:
2 Via Rosal
Camarillo, CA 93102

Letter 18

Commentor: Alyson Kaye

Date: June 29, 1998

Response:

A. The DEIR identifies potential impacts and recommends mitigations according to CEQA requirements. Mitigation Measure T-3(b) on Page 5.10-22 should reference the widening of Pleasant Valley Road from Lewis Road to the City of Camarillo rather than the City of Oxnard. This text amendment is shown in Section C of this report.

B. The DEIR identifies the traffic additions to Pleasant Valley Road which would result from the project.

C. As noted in response to Comment A above, Mitigation Measure T-3(b) on Page 5.10-22 has been revised to include the widening of Pleasant Valley Road from Lewis Road to the existing four-lane section in the City of Camarillo.

D. The Via Rosal/Pleasant Valley Road intersection does not warrant traffic signals (and will not in the future) due to the low volume of traffic on Via Rosal. The City is planning to overlay Pleasant Valley Road in the near future and will include an acceleration lane for exiting Via Rosal to eastbound Pleasant Valley Road. This will reduce wait times. It is also noted that wait times would be longer with a traffic signal than without for vehicles exiting Via Rosal.

E. See response to Comments A through D above.

June 25, 1998

(19)

George Dutra
Director, Facilities Planning
California State University, Channel Islands
PO Box 2862
Camarillo, CA 93011-2862

Subject: Comments on; "Draft Program Environmental Impact Report" for California State University, Channel Islands Campus Master Plan ... Dated June 4, 1998

Dear Mr. Dutra;

I recently obtained a copy of the report to read and what appears to me to be a few glaring oversights literally jumped off the pages. Perhaps this is because the major oversight noted directly impacts the town and area of Somis in which I reside.

A With regard to the impact of projected traffic increases, I believe that the authors literally "missed the boat" with regards to the impact to the north of the campus especially to the north of 101 freeway. It is as if the study area was deliberately chosen to exclude certain "traffic corridors" from impact consideration. **If so** then it certainly was not a "good faith effort at full disclosure" as required by Section 15151 of CEQA. **If it wasn't** deliberate then it appears to be a gigantic oversight by the involved transportation officials!

B As it states on page 2-2 of the report the pool of students will be drawn from parts of Santa Barbara and western Los Angeles counties as well as all of Ventura County. If that is truly where the students would come from then why were the potential routes of students from northern LA County (Chatsworth, Reseda etc.) and more importantly Simi Valley, Moorpark, Somis, Las Posas Valley, Santa Paula, Fillmore and eastern Ventura City not considered? A simple common sense look at a local map, common knowledge of Ventura County traffic (as claimed on page 5.10-9) and any recent (last 8 years) analysis of traffic flow on the 118 would indicate to the inquiring traffic engineer that a significant number of the residents of the aforementioned areas would and are presently using the 118 through the Las Posas Valley to get to Camarillo destinations. That is, they travel east or west on the two lane 118 and then turn south on the 34 through Somis to get to points south. They don't

B

appear to be all going to the 101 or 23 freeways to get to the Camarillo 101 area. Caltrans traffic surveys confirm the high ADT counts for the 118/34 intersection in Somis. It is already impacted. Any additional significant traffic funneled through that intersection may lower it's LOS to completely unacceptable levels.

C

This EIR study attempts to account for traffic impact to the south by including Hueneme Rd. and Potrero Rd. in the study as about 17% total CSUCI trip distribution (Figure 5.10-4). Potential traffic impacts to the east and west were studied as evidenced by the assignment of 65% total to north and southbound 101 freeway routes. So South, East and West were addressed and assigned significant traffic contribution amounts. This leaves logically the Northern approach and exit corridor.

D

The authors have assigned an extremely unrealistic 2% trip distribution amount to the Lewis Road (Hwy 34) beyond the Daily/Lewis road intersection. Despite this minuscule predicted increase in traffic the authors, for some reason, recommend that this intersection have added 2 northbound and 2 southbound through lanes to maintain acceptable level of service(page 5.10-19). That intersection presently has no exclusive through lanes in either direction. There seems to be a severe conflict or mismatch between the predicted problem (2%) and solution (4 new exclusive through lanes). Either there will be a significant increase in traffic using the 34 north and south or there won't be. What is it?

E

The authors of this EIR seem to think or accept that almost all the traffic traveling north up Lewis Rd. from the campus will stop at the Ventura Freeway, get on it and travel Northbound and Southbound (East and West by compass) back to their home designations. We in Somis only wish they would. But as Caltrans and Ventura County traffic engineers know or should know the 118 and 34 intersection has become a major East-West to North-South transition intersection due to many factors. That means thousands of vehicles daily travel the 34 north and south. The added burden imparted by the any realistic projected student traffic will definitely impact highway 34 and this intersection which is on the rabbit path between the proposed University and cities to the East and West along the 118 and connecting cities along the 126 via the 118 and 126 connection in Saticoy. These cities and areas would include eastern Ventura City, Saticoy, Fillmore and Santa Paula approaching the intersection from the west on 118. From the east might come students from the northwest section of LA city, Simi Valley and Moorpark. Certainly the grand total of students and campus workers from those cities will contribute more than the unrealistic 2% of CSUCI trip distribution as illustrated in Fig. 5.10-4.

F

Presently a high percentage of travelers utilizing the 118/34 intersection use it as a shortcut to and from Camarillo and beyond. It would be fanciful to expect the new commuters (students and workers) from the same areas to do anything differently. It is as if the potential and obvious effects on the traffic at the 118/34 intersection was deliberately ignored. Was it? Why was the study area so restricted? It was suggested in a 3-22-98 letter response to the NOPS that the effects on Somis area be addressed yet the farthest north you studied was the infamous "2%"Lewis Road in Camarillo. Lewis Road leads Northward from the campus all the way to the 118 with no interruptions except for a name change to Somis Road at the north end of Camarillo. It is only logical to have included the whole Northward length of the road (highway 34) in a study of traffic impacts caused by this University project.

G

What study was used to generate the expected time of student arrivals and departures. What University campus in California was used as a pattern to obtain travel schedules, traffic amounts etc.? Was any University model used at all? Or was the traffic study extrapolated from shopping malls, work areas etc.?

Speaking to the growth inducing potential of having this University in the chosen area; I think it is unrealistic to expect that there will be no adverse growth along the traffic corridors leading from the campus. Is there any California campus that hasn't had a small city begin to grow up around the campus within a few years? Can't we learn from history? The statement; "Although the proposed project could create pressure for development of adjacent land, implementation of these existing policy directives would prohibit such development." (page 6-7) suggests a delusive reliance on "these policy directives". Expecting that *Greenbelt Agreements, Guidelines for Orderly Development, Spheres of Influence* or the like will prevent development into the Agriculture land is wishful thinking. They are not laws but, as we citizens are often reminded (by politicians) **just** agreements and guidelines. The very fact that they were adjusted and bent in advance to allow the subject project to proceed shows how easy it is for politicians and bureaucrats to circumvent the system of loose rules if they want to. Even the supposedly solid *County General Plan* had been agreed to be modified and amended to allow this project to proceed even before the EIR was submitted. No, I'm afraid there definitely and eventually will be significant environmental and farmland incursions and damage when this campus becomes operational.

G

The suggested mitigation measures are only recommendations and have no "teeth". This EIR appears to be just window dressing to pacify the letter of the law not the spirit of the CEQUA regulations. If it was truly meant to be a serious attempt the study area on traffic impacts would have been larger and more realistic and there would have been no hiding behind the false and flimsy "skirts" of the agreements and guidelines that are only as good as the words of the parties that agreed to them. A search for significant stretches of contiguous farmland along the 101 between the cities of Ventura County gives anyone, even the most naïve, a good idea of the caliber of "teeth" in those directives.

H

As a side note, there did not seem to be any study on the potential effects of large semi-trucks traveling north and south on Lewis pass the campus. Again looking at the map showing locations of traffic generators one can see that Port Hueneme Road leads directly to and from the Port of Hueneme. With the construction of the expanded bridge at the Hueneme Rd./ Lewis Rd. junction there will be straight shot for the truck traffic from the port to travel by the campus on the improved Lewis Road. They can join the 101 or eventually get to the 118 and by-pass the Conejo grade with its' CHP weigh station. They already use the 118 to avoid just that. The new bridge along with the Lewis Road and 101 interchange improvements should encourage even more truck traffic to use Lewis Road pass the campus. Was that aspect of traffic and related safety covered in the traffic impact studies? It is peculiar that when the transportation related agencies in Ventura County wanted to justify money for roads to handle the Port traffic they pointed to the alleged "doubling" of port traffic expected. And now that they have the funding and the effect of trucks could have a negative impact on this project, I don't see nary a mention. Was the potential for increased truck traffic bought up during any of the traffic impact studies? Are they going to restrict truck traffic on Lewis below Pleasant Valley with signing?

I

In summary, I don't believe that this EIR covered the traffic impact aspects adequately at all and was totally unrealistic in the extent of study area covered as well as the expected paths and number of students traveling to and from the campus especially along the corridor leading to the north (Lewis Road a/k/a HWY 34). It will definitely impact the 118/34 intersection in Somis in a negative manner and therefore the level of service will fall. I believe that would make it a significant impact and require mitigation. This was not even mentioned although the pattern of traffic at that intersection is well known in Ventura County transportation circles.

CSUCI

J The potential safety and traffic impacts of the Port of Hueneme truck traffic was not even mentioned and I believe that there exists a good chance that the port truck drivers will seize the opportunity to travel straight out of the port, cross the new bridge being built, travel up Lewis Road pass the campus and on to the 118. This should have been addressed in a EIR.

K I think that the growth inducing aspects of the campus were approached totally unrealistically in that the projections appear to rely on the good word of agreements, virtual handshakes and Guidelines with no teeth in them like true laws! As the politicians and bureaucrats have demonstrated, no agreement or plan is sacred when they want some project to proceed. You can not realistically rely on them to prevent unwanted growth. It is ironic that the existence of agreements, guidelines and general plans etc. are pointed out as to why there will be no environmental impacts or growth inducement to the surrounding areas and yet the same policies and documents are bent, twisted and adjusted very easily to allow the subject project to get around the conflicts with those same documents.

L Thank you for the chance to register my concerns. Please include this letter as a part of the official comments on the EIR. As much as I believe in higher education, it doesn't justify an inadequate directed EIR. I realize that the report authors were fed a lot of the particular information utilized which might explain some of the "oversights". I'm also not sure the entire project as envisioned is worth the combined "Unavoidable Adverse Impacts" as listed on page 2-4. If the four important areas listed are unavoidable adverse impacts perhaps the campus should be placed somewhere else. It seems that politicians and bureaucrats control the game as demonstrated by the statement: "Based on the analysis contained herein". To that should be added "and **we** determine and control the analysis as well as set the rules". They always can fall back on rules, such as "statement of overriding considerations" that allow them to justify anything they want. Every time I get involved in government related EIR's I get more disgusted with the stacked system!

Sincerely,

John F. Kerkhoff

John F. Kerkhoff
5636 La Cumbre Rd.
Somis, CA 93066
(805)386-3044

CSUCI

P.S. I am in the process of trying to obtain the "traffic Appendices" which a small note on page iii tells me was bound under separate cover. I was also under the impression that the deadline for comments was June 26th. But now I've heard that there will be a meeting for the public to discuss the EIR on the end of the month. Anyway, I am sending my comments on the report now as I certainly don't want to miss the deadline and I don't know if I'll be successful in obtaining and digesting the appendices in time either.

M

A final comment....I really don't approve of the proposed ancillary mix of commercial, research & development, housing etc. on and off the campus that has no direct bearing on the education of students. It is like the mixture of church and state, they don't have compatible goals and shouldn't be accepted no matter what the noble or financial justifications. Besides the addition of such units and special interests almost guarantees excess growth inducing problems eventually spilling over to local land use decisions. All in all, a messy project and even messier proposed solutions.

cc: Clerk of the Board
Keith Turner, Director of Planning
Tom Berg, Director of RMA
Ginger Gherardi, Executive Director of VCTC

CSACJ

Letter 19

Commentor: John Kerkhoff

Date: June 25, 1998

Response:

A. The traffic analysis includes traffic additions north of U.S. Highway 101. As indicated on Figure 5.10-4, 2% of student trips are on Lewis Road, and 10% of ancillary development trips are assigned to this route. Trip distribution parameters were developed for CSUCI traffic using projected student demographic data provided by CSUCI, as well as shortest travel time routes. The vast majority of the traffic is expected from Santa Barbara, Ventura, Oxnard, Camarillo, and Thousand Oaks.

B. See response to Comment A above. Impacts to Route 118 would be less than significant based on CSUCI student demographic data and the travel route forecasts. Travel route forecasts are based on destination/route studies that have been conducted by traffic engineers over several decades. Such studies indicate that motorists will preferentially travel on high speed interstate freeways than local two-lane rural routes.

C. See response to Comment A above. Impacts to areas to the north via Route 34 and Santa Rosa would be less than significant based on CSUCI student demographic data and the travel route forecasts.

D. See response to Comment A above. The Lewis Road/Daily Road intersection is forecast to operate in the LOS D range with short-term buildout traffic volumes without any traffic from the CSUCI project. The addition of traffic generated by the project at this intersection (40 critical trips) would exceed the City of Camarillo's impact thresholds, thus a mitigation measure was included in the DEIR. It is noted that this improvement would be required with or without the CSUCI project, and is not the result of significant traffic loading generated by the project at this location as suggested in this comment.

E. CSUCI traffic additions north of U.S. Highway 101 is estimated at 4% (2% via Lewis Road and 2% via Santa Rosa Road) based on student demographic data provided by CSUCI. Travel north of U.S. Highway 101 associated with the proposed residential and research uses is forecasted as 20% (10% via Lewis Road and 10% via Santa Rosa Road). Review of existing travel patterns in the study area support the distribution analysis presented in the DEIR. For instance, the current traffic volume on Route 34 north of the City of Camarillo is 12,300 ADT and the volume on Route 118 at Route 34 is 10,600 ADT, while the volume on U.S. Highway 101 east of the City is 106,000 ADT and the volume on Route 23 just north of the U.S. Highway 101 interchange (towards Moorpark and Simi Valley) is 90,000 ADT. Clearly, travelers in the area are preferentially using the major freeways for most of their east-west and north-south travel rather than the two-lane rural routes. It is further noted that if travelers from eastern City of San Buenaventura (= Saticoy) and Santa Paula choose to get off the freeway system, that a much faster route from these locations to the

project site is Central Avenue, not Highway 118 which takes them several miles away from their ultimate destination.

F. See response to Comments A through E above.

G. Trip generation estimates for CSUCI were based on studies of other universities using rates published in the Institute of Transportation (ITE), **Trip Generation Manual**, 6th Edition. These rates were also confirmed with counts conducted at other colleges in California. Please see Section 6.1 regarding the growth-inducing impacts of the proposed project. Most of the CSU campuses are located within or adjacent to city boundaries and growth adjacent to these campuses does not provide a reliable history. However, a local example is that the Cuesta Community College in San Luis Obispo County has not had any residential or other growth adjacent to it; such growth has been accommodated within the City of San Luis Obispo. Similarly, growth associated with the CSU, San Luis Obispo campus has also occurred in the city south of the campus and not in the rural areas to the east and north of the campus.

H. Buildout traffic volumes were derived from the Camarillo's General Plan Buildout traffic model, which includes growth external to the City including Port Hueneme. Specific impacts associated with expansion of Port Hueneme will be addressed as part of the environmental review completed for the port expansion. It is noted that Caltrans weigh stations cannot be avoided by using Highway 118. Caltrans constructed a weigh station on Highway 118 just west of the City of Moorpark several years ago specifically to intercept such travel. Fines for overweight trucks caught at this weigh station are substantial.

I. See response to comments A through H above.

J. See response to comment H above.

K. The commentor disagrees with the analysis presented in Section 6.0, Long Term Effects. This topic is discussed in detail in comment and response 5C. Any change in zoning to adjacent lands that might accommodate additional urban growth in the vicinity of the proposed project site would be a separate action by the Ventura County Board of Supervisors, and would require additional environmental review at such time. Any such development is not required by the CSUCI project and is inconsistent with existing zoning and the County General Plan.

L. Comments provide a personal opinion and no response is necessary. These opinions are forwarded herein to the decision-makers for their consideration.

M. The traffic appendix was available at the project site during the public review period. The EIR review period extended to July 21, 1998. Your opinion regarding the proposed revenue-generating aspects of the proposed project are forwarded herein to the decision-makers for their consideration.

July 20, 1998

(20)

George Dutra
Director, Facilities Planning
California State University, Channel Islands (**I still don't like that name**!)
PO Box 2862
Camarillo, CA 93011-2862

The Trustees of the California State University
400 Golden Shore
Long Beach, CA 90802-4275

Rincon Consultants Inc.
790 east Santa Clara Street, Suite 103
Ventura, CA 93001

Subject: Additional comments on :Draft Program Environmental Impact Report" for California State University, Channel Islands Campus Master Plan ... Dated June 4, 1998 (plus comments on related subjects)

Dear Mr.Dutra... and ,
the Trustees of the California State University... and
Rincon Consultants Inc.,

After attending the 6-30-98 EIR meeting at the site of the proposed CSUCI campus, I have a few additional comments to be made in addition to my letter of June 25, 1998 (copy attached for your convenience).

Please bear with me as some of these remarks may not be directly EIR related:

A

1. I hope that the trustees ensure that the 1930 style buildings are up to the current and proposed earthquake resistance standards. If not, that can become a gigantic tragedy and/or expense in the future. You should not forget the Northridge experience.

Also, in my limited walk around the campus, I didn't see permanent type wheelchair access ramps or related improvements. Won't that be a requirement for a public facility?. What will those improvements cost? How many other hidden expenses have been overlooked in this rush to get this project off the ground?

2. I was told a most **disturbing** item recently. I was told that at a recent dinner meeting in Camarillo (about 40 people in attendance) that Mr. Evans gave a talk on a plan for accelerating the growth of the university. He reportedly stated that about 70% of the students were projected to come from the Los Angeles area. ***IF*** that is true that disturbs me on **two** counts. First, I was under the impression that the university was needed to serve Ventura County primarily. In fact the EIR (page 2-2) emphasizes the local (Ventura and Santa Barbara Counties) needs not Los Angeles. As we, in Ventura County were "sold" this university on the basis of OUR local needs not the needs of Los Angeles, I feel that we may have been hood-winked. We, in this county, will be suffering the negative impacts of this project for the rest of our lives for a 30 % share of the benefits. I hope that the rumor is not true as no one likes to be deliberately misled (or lied to). B

The second aspect that disturbs me about the alleged comments by Mr. Evans and should disturb others is that the traffic study in the EIR does not reflect that 70% Los Angeles direction bias. That is, the engineers at Rincon Consultants did not receive the same expected student distribution source as Mr. Evans reportedly spoke about. Judging from their conclusions, they based their analysis on just the opposite directional bias with as much as 83% of the students coming from directions other than Los Angeles. That is, their numbers reflect a maximum of 17 % of the students coming from the east (LA area) instead of the 70% as reportedly stated by Mr. Evans. **WHICH NUMBER IS CORRECT?** ***IF*** what Mr. Evans reportedly said is any where near correct or even off by a factor of 2, then the entire traffic analysis of this EIR is **INVALID!** If the traffic analysis is invalid, then the impacts of same are in error and the **EIR can't be accepted.**

******** Please let me know as soon as possible as to my concerns********

- Did Mr. Evans say those things?.
- If so, how do you reconcile them with the EIR student direction bias?
- What did Mr. Evans base his statements upon?
- What are Mr. Evans plans for accomplishing "accelerated growth" for the University, as he allegedly spoke about ?
- There must be a study somewhere on where the students are expected to come from. Could I have a copy of same?

- What geographic areas are to be targeted with ads, news releases etc. to attract students to CSUCI? Has that been formalized in writing?

3. The inclusion of commercial office and research facilities on an educational campus still does not ring true with me. A University should be trying to **enrich the minds** of their students while business interests obviously are trying to **enrich the pockets** of their owners or stockholders. Like religion and the government, they don't have the same goals and are not truly compatible. We all know who will win and which goals will be compromised as money speaks louder. More than a hint of that thought is included in a recent local paper article where the head of jeTECH is quoted as saying; "by being the first technology company on campus, jeTECH is in a **strong position to INFLUENCE development of the new university's technology-oriented curriculum".** How much influence will commercial interests have? JeTECH speaks of needing as much as 3 times as much floor space, in the future, as they presently lease. Will the university eventually displace or postpone educational facilities to accommodate commercial money making ones? When will the pursuit of money or funding end. When will the commercialism and non-educational uses stop? Certainly the proclaimed need for funding will never disappear! I guess you are destined to be hooked! A quote by the French philosopher, Jean - Jacques Rousseau comes to mind; "the money you have gives you freedom—**the money you pursue enslaves you".**

C

Additional concerns to me would be if the firms that engage in cooperative research are foreign such as has happened at UCI (Irvine). That is, their ownership and therefore allegiance is to another country. I really don't like the idea of my tax money benefiting a company that could destroy or buy out an American company thereby eliminating our jobs, our ownership etc. and indirectly have control over our destiny. I guess I am not a 100% believer in the so called benefits (to the U.S.) of a global economy. If I ever live to see a U.S. surplus or near surplus balance of trade I might think differently. But as it has been 25 years since we had a surplus, I don't think I'm in danger of having to modify my stance.

As an aside, with all the emphasis on PRIVATE commercial, housing and research facilities to be placed on a PUBLIC campus it seems that you are almost a private institution or at least becoming more so. Then why should the citizens of California support you?

D

4. Speaking of commercial interests, it was pointed out by one speaker that the exact nature of these so called private ventures were not spelled out. Are we to expect a K-Mart, a Taco Bell, or what? When does the "city within a university" stop? How can the trustees make a decision on this EIR with such vague descriptions? Is the inclusion of one brand over another a tacit approval by an educational body. What cigarette brand or beer brand will they sell or implicitly endorse? How will that reflect on the trustees? Will the trustees even have a say in the choice of what type, brand or size of commercial developments are instigated? Has the educational establishment sold the exclusive control of selected aspects of campus life to other authorities and interests? As I understand it some of the "authorities" over the commercial aspects of the campus will include other politicians. If so, isn't that sort of against California code 66607 where it states that "the CSU shall be entirely independent of all political and sectarian influence". Of course, with the Governor and other politicians already on the voting board I suppose that is a moot point. I really can't comprehend some political and bureaucratic interpretations of wording.

E

5. With regards to the various uses of the 900 or so proposed residential units, I don't understand the reasoning and justifications for such uses as elder citizens housing. I think you are just compromising the true purpose of a university by cloaking it with so called "funding" financial solutions. If the goal is generating income why not also units for the rich who would like to live on a campus of higher learning? Or perhaps residential units for the mentally challenged. Now that would be a unique use of these former mental hospital grounds. Just think, ironically, the **state** could be paying you (the **state** also) for housing the disadvantaged people who were displaced or "kicked out" when the Hospital was closed by the **state** originally.

F

6. As my earlier letter stated, I believe that the impacts to the surrounding and nearby roads and intersections (especially the 118/34 in Somis) were not adequately addressed in this EIR. For instance, something is wrong or not being explained well when a projected 2% student use (250 for 12,500 projected FTES) problem is mitigated by enlarging a 3 lane wide intersection (Daily and Lewis) to 6 lanes. See my original letter for elaboration about these concerns. Recently Steve, of Rincon Consultants was patient enough to try to explain that disparity between the perceived problem (2% student use) and the proposed mitigation solution (6 lanes) by stating that they had to incorporate the city of Camarillo's plans for the intersection into their EIR. I think that is trying to say that the EIR's

F mitigation proposals are hidden and dwarfed by Camarillo's plans for that particular intersection. It wasn't exactly clear other than I should be looking to Camarillo for my answers and traffic concerns.

G **7.** I agree with one of the speakers that night (I believe it was the Sierra Club representative) who stressed various ways to discourage individual motor vehicle use to get to and from the campus. If we of Southern California are ever going to break the vicious cycle of bigger and faster roads followed by developments that need even more roads beyond to provide access to more homes etc. etc., we had better start soon. What better place to start than here at this proposed "place of higher learning". Dare to be politically unpopular and propose strong disincentives to using individual vehicles **now**. That will lessen the air quality and traffic impacts as well as lessen the costs to improve so much traffic infrastructure. It will also help to quiet people like me that object to the ever increasing traffic that is such a threat, directly or indirectly, to our Ventura County "quality of life".

H **8.** Throughout this EIR the organization known as SCAG (Southern California Association of Governments) was quoted. Citing SCAG job, population and housing projections does not fill me with confidence as that organization is the same one that ranked the tiny Port of Hueneme as a "major" seaport alongside the Ports of Long Beach and Los Angeles in a recent major transportation related report (it comprises less than 1% of the total gross tonnage of the 3). In my opinion, they have proven that they can have their reasons for self serving statements and projections. Of course, I suppose one could say that about almost all EIR proponents also.

I **9.** Again, within this EIR, comparison of the potential environmental impact effects of the projected 3700 campus dwellers with the original Hospitals peak of 7000 patients was made. This is a ridiculous and misleading comparison to say the least. The patients of the Mental Hospital, by their very nature, did not have cars, full residential housing, or travel off the grounds. The impact of their activities on the local community was minimal to say the least!

J **10.** At several places in the EIR, any mention of the growth that will be induced by this project are explained away by stating that the City of Camarillo could absorb that aspect of the growth. The continued reference to and reliance on what Camarillo can handle implies that the campus will

J | eventually become part of the city in the future. Thereby the areas in between the city and campus will undoubtedly be developed.

K | **11.** One memorable experience that I observed when I drove into the facility that evening was seeing 3 deer (a doe and 2 fawns) to the left of Camarillo Drive browsing on grass in a meadow. Several people remarked on the beautiful entrance that Camarillo Drive presented to the campus. A reading of the planned transportation infrastructure shows that the 2 lane, tree bordered entrance road will be replaced by a 4 lane "expressway" to better handle the expected traffic. The widening will probably destroy the magnificent trees and I'm sure that the doe and her fawns will not be around with the planned commercial developments and 12,000 students. Too bad that trees and does can't protest, vote and attend EIR meetings!

On a more positive note, I want to **thank** who ever set up and controlled the June 30th meeting. The speakers were not artificially limited to some short time period like I have witnessed at other EIR and related meetings. Even if I don't believe the speakers comments will have much of an impact on the final EIR at this late date they were allowed to air their concerns and put it on public record. An additional compliment should go to the Rincon Consultants Inc. Steve of that firm was very patient in trying to answer my layman's concerns. Mr. Dutra and his staff were also helpful, efficient, and prompt with their replies.

L | Lastly to add to my initial letter comments where I ended by saying that I have become so disillusioned with government related EIRs... The June 30th meeting and the whole process reinforced that feeling. No matter what Mr. Evans said that night, **the passage of the EIR is a "done deal".** He lost credibility when he tried to say otherwise. When the process is so rushed and on a "fast-track" that the funding is already in the works, the Senate has passed the funding bill, the Governor has given his blessing, the committee of the State Assembly unanimously approved the funding bill that very day, commercial interests have already leased and moved in, and so many important people have their reputations and political prestige on the line there is no way that you trustees will turn down this proposed campus. Heck, the campus is even already listed on the CSU web-site map of campuses and apparently even has a Newsletter. All in all, not the actions of a organization that is expecting to be turned down. **The trustees are just the final rubber stamp.** No, this EIR and the attending last minute meetings such as June 30th, are just **shams** to meet the CEQUA letter of

the law requirements. It is the false mask of procedures like this that makes the ordinary citizen to lose faith in the sincerity of our government officials and bureaucrats. These meeting the "letter of the law" shams are even worse than the individual politician who tries to convince the voters that he followed the letter of the law if not the spirit. Being technically **"legal"** doesn't mean that one is **"moral"**. One doesn't have to have a Ph.D. to understand the moral difference between the letter and the spirit of the law. It seems to this taxpayer that you (Sacramento and Washington) make the regulations, set the parameters to compare (the NOP) and then judge and decide what impacts are unavoidable, propose the mitigations necessary, valid or not (this EIR), control the timing of any public input (late, after decisions are made, meetings like this) and finally rubber stamp the outcome (the trustees vote). Throughout this whole procedure a **facade** is put forth that public input has some significant impact on the decisions even though they were decided long ago and pre-ordained. It is made to look like the system is working for the good of the public and is doing us taxpayers a favor when in fact it costs taxpayers additional money to put on the facade and is really a game of money, power and empire building!

One thing that this writer is looking forward to sadly, is the spectacle of the anticipated squabbling between the powers that control the commercial ventures on the campus and those among the administrative powers who want to run an educational institution. And, of course, there will be the complaints that the commercial power people are always looking over the shoulders of the educational people and influencing decisions and visa versa. In other words, this writer believes that the dual nature of Commercial vs. Educational (Private vs Public) interests will compromise what the California State University is suppose to be about. It is sad when principles are compromised for financial considerations.

Sincerely,

John F. Kerkhoff

John F. Kerkhoff
5636 La Cumbre Rd.
Somis, California 93066
(805) 386-3044

PS.. I really believe in higher education. I just don't like how this particular project has been ram-rodded through so fast, along with the potential for errors, conflicts and oversights leading to the attending ramifications of same. My

concerns and feelings of deception will only be compounded if the 70% LA student projection is born out.

I predict that within my lifetime the area around the campus will become another county city or be incorporated into Camarillo (see item # 10 above). That will, of course, be the result of growth inducing pressures unleashed by this project. This will occur no matter the EIR's pronouncement (page 5.7-11) that "existing regulatory mechanisms would largely prohibit further development in that area". Just looking at what has happened to the 101 and 118 freeway corridors within Ventura County shows the all encompassing development growth under the auspices of those same "regulatory mechanisms".

Letter 20

Commentor: John Kerkhoff

Date: July 20, 1998

Response:

A. The issue of seismic safety is discussed in detail in Section 5.5, Geology and Soils. In addition to stringent state requirements the CSU must adhere to regarding buildings on state university campuses, additional mitigation measures have been applied. Please review Mitigation Measures GEO-1(a) through (c), and GEO-2.

The CSU will be subject to the Americans with Disabilities Act, which will require retrofitting to address ADAs as part of the adaptive reuse design of most existing buildings, and will require ADA-compliant design for new structures. ADA compliant features are already present throughout much of the campus, consistent with its former use as a State hospital.

B. The CSUCI is being planned to address the needs of Ventura County and a portion of Santa Barbara County. Neither county has a full-service campus of the California State University. Los Angeles County has a total of five full-service California State University campuses: Los Angeles, Northridge, Long Beach, Cal Poly Pomona, and Dominguez Hills. Whereas a small proportion of Los Angeles County residents – perhaps those residing in Malibu or Agoura Hills, may be geographically closer to the Channel Islands campus and may choose to enroll there, the 70% figure is vastly overstated and inaccurate. Currently, only 3.4% of the students that attend the OCC in Ventura reside in Los Angeles County.

C. The unique role and legislative mandate of this campus is that it be financially self-supporting. CSU officials are working to make this unique charge as academically-beneficial as possible. This issue is addressed in comments and responses 16A and 16B. The other opinions of the commentor are noted.

D. The CSU has committed publicly to revenue-generating uses that support or enhance the academic mission. Some of the residential uses are geared toward assisted-living facilities which could affiliate with public health or gerentological studies programs. Other housing could directly serve to house university students, staff, and faculty.

Commercial leases will primarily serve research and development interests in technology, biotechnology, and environmental technology. These leases are intended to tie into the academic program, thereby offering opportunities for employment of students on-campus in private business. The recent lease with the CalSTART, a non-profit transportation technology consortium is an example of the type of lease arrangements the CSU is seeking. Ultimately, ancillary land use controls will be subject to a Specific Plan, to be regulated by the Special Authority. The commentor's included

personal opinions regarding the commercialization of higher education is noted for the decision-makers.

E. The primary purpose for the 900 dwelling units is to generate income. The link with elder care facilities meets both a market demand and presents an opportunity to develop academic experts in the growing area of gerontology. The suggestions for other options for housing appears to have been presented for humorous effect. If intended as a serious comment, there is no evidence that the proposal is feasible. Similar possibilities were explored by the State hospital in connection with its closing and rejected as infeasible. The project's proposed use was selected following consultation with private developers on what kinds of development would be feasible and consistent with the university use.

F. Please see response to comments contained in Letter 19 above. Geometrics contained in the EIR mitigation measures include those proposed by the City of Camarillo to meet General Plan build-out volumes. Please also see Section C of this report for additional information regarding the recently funded US Highway 101/Lewis Road interchange.

G. The commentor raises the issue of trip reduction and its relationship to air quality impacts. These issues have been addressed by other commentors, and have resulted in refined mitigation measures. Please note especially response to comment Letter 15, above.

H. The Southern California Association of Governments is the regional Metropolitan Planning Organization for Ventura County and its cities, as so designated by the Federal Government. Though its projections are open to question, they are the most commonly used by government entities for regional planning purposes.

I. The information in the EIR regarding its former use was included in part to provide the reader with comparative information relative to the intensity of the use of the site. While the patients did not have vehicles, the employees of the hospital (at one time up to 3,000 employees), the patients' visiting families, and the service deliveries did. The point that the new type of use that is proposed will differ is reflected in the projected traffic volumes which have been based on both university use and the ancillary residential and research uses.

J. The information regarding the City of Camarillo's growth plans is provided to illustrate that demand for new commercial and industrial facilities can readily be accommodated by a nearby city. This would suggest that development would most likely occur there, where it is planned for, rather than on university-adjacent land, where it is explicitly not planned for development. The City of Camarillo would have to formally apply to Ventura LAFCO in order to expand its Sphere of Influence southward toward the proposed project site. Such an action is not currently contemplated.

K. Please note responses to Comment 17I above. Such modifications to Camarillo Drive and other roadways will be implemented after monitoring and demonstrated demand. If trip reduction strategies succeed to the extent that overall demand does not warrant

them, they that will not be pursued. Mitigation measures to address the potential for tree removal along Camarillo Drive have been included in Section 5.1, *Aesthetics*.

L. The commentor's opinions are noted. From an environmental perspective, it should be reiterated that the mixing of land uses represented by the inclusion of revenue-generating uses could result in certain beneficial impacts with respect to transportation and air quality effects. These benefits may not be realized with a university-only project. Please see Section 7.3.3 for a discussion of a university-only alternative.

June 30, 1998

(21)

Lamplighter Mobil Home Association
Committee member - Matthew Lorimer
98 Camino Algarve
Camarillo, California 93012

Channel Islands California State University
1878 South Lewis Road
Camarillo, California 93012

The EIR report did not mention Lamplighter Mobil Home park, which is located off of Pleasant Valley Road (Via Rosal). Our concerns are based on the fact that residents are having a very difficult time getting out of the park on to Pleasant Valley Road. The drivers are always driving extra fast, which we know to be fact as we have gotten information from the Sgt. Chris Lathrop of Ventura County Police department in Camarillo. The statistics from January 1, 1996 to March 19, 1998, (section 22349 of the code book) showed over 300 speeding violations on Pleasant Valley Road. This information was provided to the city of Camarillo engineer department - Tom Fox. He said that because there is not enough traffic flow, we could not expect a traffic light which we need. The only thing that the city will provide is restriping. This information is based upon current traffic flow. Two months prior to the EIR report, we spoke to George Dutra about our concerns, based upon people coming from 101 freeway and going along Pleasant Valley Road to Lewis road in order to get over to the university. The nearby housing track got two stop lights, (at Pancho Road and Ridgeview Road) in order to safely exit onto Pleasant Valley road. Because of the fact that we do not have a traffic light, many residents have to stomp on the gas in order to get across the road on their daily routine of just trying to get to work.

CSUCI

We would also like to know if the university will be providing enough food places on campus to take care of all of the students and to help prevent the more unnecessary traffic problems. We hope that you will consider a wide variety of choices for the students so they don't have to drive all around Camarillo searching for food and causing more traffic problems.

We are in favor of a Channel Islands University, but we hope that the university will consider our community who will be impacted by any and all decisions that are made.

Sincerely,

Matthew Lorimer

Letter 21

Commentor: Matthew Lorimer

Date: June 30, 1998

Response:

A. Please see responses to comments A-D of Letter 18 above.

From: sgmitchell@imation.com (6/30/98)
To: Carmen Smith
CC: tmgs@aol.com
Mail*Link® SMTP

(22)

Bicycle Access Through CSUCI Campus

954 Ballina Court
Newbury Park, CA 91320-3611
June 30, 1998

Mr. J.H. Evans, President
CSU, Channel Islands
PO Box 2862
Camarillo, CA 93011-2862

Dear Mr. Evans,

As an avid bicyclist, I'm looking forward to having CSUCI located at the site of the old State Hospital, and the resulting road improvments which will (eventually) occur.

I live in Newbury Park, work in Camarillo, and ride my bike to work 2-3 times a week. The only two routes open to bikes between Newbury Park and Camarillo are Moorpark/Santa Rosa Road and Potrero Road. The only problem with both of these routes is that they involve traveling a steep grade with no shoulder (Moorpark Road and Potrero Road). Fortunately, Potrero Road has much less traffic in the afternoon than Santa Rosa Road/Moorpark Road, so it is Potrero Road that I use to get home.

However, there is one major hazard with using Potrero Road; the Potrero, Lewis, Hueneme Road intersection on the southeast side of Round Mountain. Traveling south on Lewis Road requires a left turn to Potrero Road, which would not normally be too hazardous. Unfortunately, the intersection is located on a right curve, with limited sight distance, immediately before a bridge, and with no extra pavement/shoulder for vehicles to pass on the right while I'm trying to turn left. I wish I could adequately describe to you the feeling one has on a bicycle at that particular intersection. I have been riding for almost 15 years in Texas and Southern California, and I would have to say that intersection wins for the "most dangerous feeling".

Now that I have described the situation I face 2-3 times a week, on behalf of all the bicyclists who negotiate the same intersection, I

would like to request a slight modification to the Campus' gate on Potrero Road. If at all possible, could the gate on Potrero Road be opened enough to permit passage by bicycles, or could one side of the gate remain fixed, but be shortened (width not height) to accomplish the same goal?

The purpose for enabling access through the gate is to allow bicyclists to traverse from Lewis Road to Potrero Road via the campus, thus avoiding the dangerous Potrero/Lewis/Hueneme intersection. This "campus route" would have additional safety-enhancing results: bicyclists could make a left turn onto Camarillo Drive from the existing left turn lane on Lewis Road; there is significantly less vehicle traffic volume and speed on Camarillo Drive compared to Lewis Road; and Lewis Road has no viable shoulder or bike lane from Camarillo Drive to Potrero Road, which is alleviated by traversing Camarillo Drive.

Thank you very much for considering this request. Allowing bicyclists through the campus will set a positive precedent for the future of what I hope will be a bicycle friendly campus. If you have any questions, please feel free to contact me at home, 805-499-4894, or at work, 805-388-4165. I'm also available any time if you would like to ride through the Potrero/Lewis/Hueneme intersection on a bicycle.

Regards,

Scott Mitchell

Letter 22

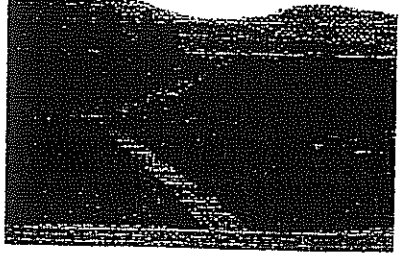
Commentor: Scott Mitchell

Date: June 30, 1998

Response:

A. It is anticipated that bicycle/pedestrian access would be provided between Potrero Road and the campus. Also, mitigation measures include widening and signalization of the Lewis Road/Hueneme Road/Potrero Road intersection, which would assign right-of-way and should improve bicycle safety. Shoulders on Lewis Road and Cawelti Road are also recommended to be widened based on Phase 1 traffic impacts and implementation of these measures would increase safety along these roadways.

CSUCI



SAVE OUR SOMIS

(23)

P.O. Box 661
Somis, California 93066

July 20, 1998

Mr. George Dutra
Director, Facilities Planning
California State University
Channel Islands Campus
P.O. Box 2862
Camarillo, California 93011-2862

Rincon Consultants, Inc.
790 East Santa Clara Street, Suite 103
Ventura, California 93001

Trustees of the California State University
400 Golden Shore
Long Beach, California 90802-4275

re: Draft Program EIR for California State University, Channel Islands Campus Master Plan - 6/4/98

Gentlemen:

We are writing to bring to your attention the fact that the draft EIR does not address potential impact to the north of the campus particularly Highway 34 leading to the north over to Highway 118 in Somis. This particular traffic corridor would be expected to accommodate students and others whose points of origin are located in Simi Valley, Moorpark, Somis, Fillmore, Santa Paula, Las Posas Valley, Chatsworth, etc. One of their logical "rabbit paths" could be to take Highway 118 to Highway 34 and south to the campus. Your draft EIR states that on Page 2-2 the pool of students will come from parts of Santa Barbara and western Los Angeles counties as well as all of Ventura County. And yet, your report does not seem to even acknowledge the existence of Highway 34 north/ Highway 118, let alone discuss impact. We find this to be a glaring oversight.

The EIR study apparently attempts to account for traffic impact to the south by including Hueneme Road and Potrero Road in the study as anticipating approximately 17% total campus trip distribution. Potential student traffic impact from the west (relative to the campus) appears to be assigned 60%, 17% impact from the east, and 4% to students coming from the surface street areas of Camarillo. This would leave 2% anticipated to come from the north, which we consider to be totally unrealistic especially when one takes into account that north would include Highway 34 North, Highway 118 and the communities served by those corridors

CSUCI

as mentioned above. Interestingly, despite this small 2% traffic distribution amount allocation to the Lewis Road/ Highway 34 (beyond Daily/Lewis Road), the authors of the EIR are recommending that the Lewis Road/Daily Drive intersection add another northbound and two southbound exclusive through lanes to maintain acceptable level of service. It presently has only one exclusive northbound through lane and no exclusive south-bound lane. This suggests a contradiction within your own report - the predicted "problem" in this area is 2% and yet the "solution" is three new exclusive through lanes!

The added burden on roads caused by what has to be a realistic projected student traffic count will definitely impact Highway 34 and the intersection of Highway 118/Highway 34, as well as the small long-standing community of Somis. If a route concept report for Highway 34 (prepared by Caltrans or any other authority) has been reviewed and considered by your consultants, as they indicated it had at the June 30th public EIR meeting, we request that it be included in the EIR. In addition, we would appreciate receiving a copy of same.

We have also heard that the University expects to recruit as much as 70% of its student body from Los Angeles County. Yet again, nowhere do we see that type of traffic volume attributed to student traffic coming from the Los Angeles side of Ventura County. If this 70% expectation is true, or even half true, then in our opinion this would invalidate the EIR.

Therefore, because your EIR report fails to consider the impact on <u>all</u> of Highway 34, and Highway 118, and on the community of Somis itself, we consider the traffic impact part of the EIR to be definitely flawed and incomplete. Further, because your report fails to address the impact on the community of Somis itself, we consider that the LAND USE-COMMUNITY CHARACTER and LAND-USE GROWTH INDUCEMENT parts of your report to be flawed, incomplete and lacking. If the foregoing impacts can be mitigated in some way, or if there are alternatives to these impacts, we believe the EIR should identify, address and solve those issues. We are respectfully requesting that the foregoing omissions be corrected and we would appreciate your cooperation and compliance in those areas.

Also apropos the issue of traffic, we would like to point out that the report does not mention the potential safety and traffic hazards of Port Hueneme truck traffic. With the new bridge being

built at Calleguas Creek, that route would be an attractive one to truck drivers coming in or out of Port Hueneme, to travel up Lewis Road, pass the campus and on the 34 to the 118 (thus avoiding the weigh station on the Conejo Grade as they do now).

Before closing, we also wish to express our concern over the proposed combining of commercial research and development ventures on the campus. It stands to reason that the effect of commercial ventures could generate growth inducing pressures, and in a relatively short space of time we could be confronted with not merely a university but a small city replete with movie house, McDonalds (generic choice of words), etc. A university should concern itself with its prime directive - education. Commercial research and development are growth inducing and could very well lead to a conflict with local land use decisions as well as have other unintended consequences.

Several members of our organization were at the public hearing on June 30th. We were impressed by, and would like to express appreciation to Mr. Dutra and the other organizers of that meeting, for the fact that you permitted the public to speak without restricting their comments to just a couple of minutes. This was the very first public meeting we have ever attended that permitted that courtesy, and we wish to thank you.

Please send us notices of all hearings to that we can continue to participate in the process. Mailings to Save our Somis should be addressed to P.O. Box 661, Somis, California, 93066.

Thank you.

Very truly yours,

David C. Ruth, President
(805) 386-8020

cc: Ventura County Board
of Supervisors
Att: Supervisor Kathy I. Long

Letter 23

Commentor: David Ruth, Save Our Somis

Date: July 20, 1998

Response:

A. The traffic analysis includes traffic additions north of U.S. Highway 101. Trip distribution was developed for CSUCI traffic using projected student demographic data provided by CSUCI. CSUCI traffic additions north of U.S. Highway 101 is estimated at 12% (2% via Lewis Road and 10% via Santa Rosa Road) based on student demographic data provided by CSUCI and the travel route forecasts.

B. See response to Comment A above.

C. The Lewis Road/Daily Road intersection is forecast to operate in the LOS D range with short-term buildout traffic volumes without any traffic from the CSUCI project. The addition of traffic generated by the project at this intersection (40 critical trips) would exceed the City of Camarillo's impact thresholds, thus a mitigation measure was included in the DEIR. It is noted that this improvement would be required with or without the CSUCI project, and is not the result of significant traffic loading generated by the project at this location as suggested in this comment.

D. See response to Comment A above. Impacts to areas to the north via Route 34 and Santa Rosa would be less than significant based on CSUCI student demographic data and the travel route forecasts.

E. The DEIR analysis did not assume a 70% student distribution to LA County, as the University is not anticipating this level of student loading from this area. Currently, only 3.4% of the students that attend the OCC in Ventura reside in Los Angeles County. Also see responses to Comment A above and Comment 20B.

F. See response to Comments A through E in Letter 19.

G. See response to Comment I in Letter 19.

SIERRA CLUB

(24)

Sespe Group of the Los Padres Chapter

"Not blind opposition to progress, but opposition to blind progress."

July 21, 1998

RE: DRAFT ENVIRONMENTAL IMPACT REPORT, CALIFORNIA STATE UNIVERSITY, CHANNEL ISLANDS

The Draft Environmental Impact Report (DEIR) for the CALIFORNIA STATE UNIVERSITY, CHANNEL ISLANDS is fatally flawed both procedurally and substantively. The document therefore fails to achieve the standards for adequacy prescribed within CEQA Guidelines (15151) and furthermore fails to achieve the standard of "a good faith effort at full disclosure."

A

The DEIR for the Project violates the basic standards and requirements of CEQA, and thus fails to provide the public and the decisionmakers with information necessary to evaluate the Project. Despite CEQA'S mandate for full public participation in decisionmaking, the public was not given adequate opportunity to comment during the scoping/notice of preparation, or on the DEIR, or to participate in the approval process for the Project. In addition, the DEIR fails to provide an adequate description of the Project, which is the cornerstone of CEQA compliance, and omits discussion of the full range of government approvals and decisions that will be required for the Project.

B

The DEIR also violates a fundamental mandate of CEQA by failing to adequately analyze the significant environmental effects of the Project. Rather, the DEIR understates and misstates certain significant effects and fails entirely to identify others. The mitigation measures presented by the DEIR also fail to comply with CEQA standards and do not support the conclusion that the significant effects identified will be rendered insignificant by the mitigation measures offered.

The project itself, has been improperly segmented so as to avoid consideration of significant impacts on the environment, to differ mitigations to another project and agency and to avoid recognition of the growth inducing and other impacts generated by the project.

C

The DEIR also fails to comply with a basic requirement of CEQA by providing a patently deficient analysis of the cumulative impacts of the Project. Rather than describe the collective impacts of the Project and "reasonably anticipated future projects" as required by CEQA, the DEIR provides a partial list

C | of nearby projects without any meaningful attempt to analyze their combined environmental impacts.

D | A further basic CEQA requirement violated by the DEIR is the mandate for evaluation of alternatives. Rather than provide the detailed and quantitative comparison required by CEQA, the DEIR presents and dismisses a limited range of alternatives, without providing any meaningful evaluation of their feasibility. In fact, the DEIR goes to great length in avoiding consideration of existing feasible alternatives which are common knowledge to other responsible agencies and individuals.

E | Because of these and other objections I must recommend that the CSU Board of Trustees reject certification of this DEIR. It must, therefore, be redrafted and recirculated, if the project is still desired. Selection of any alternative must at this time be considered to be premature and inappropriate. Therefore, the no-project alternative, by default, must be considered the superior choice if the decision is made today.

<u>The Public Has Not Been Afforded an Adequate Opportunity to Comment on the EIR and Participate in the Approval Process.</u>

The NOP and DEIR have not been adequately noticed to the public. "Public participation is an essential part of the CEQA process. Each public agency should include provisions in its CEQA procedures for wide public involvement, formal and informal... in order to receive and evaluate public reactions to environmental issues related to the agency's activities." Guidelines, section 15202.

F | The CSUCI has failed to include interested parties, organizations, property owners and even other responsible agencies in its scoping and notifications for this project.

It is especially troubling that this project which is to be publicly sponsored and publicly funded has been hidden from the same public which will ultimately pay the price for its success or failure. This project, unlike private projects which often only meet the minimum requirements of the California Environmental Quality Act (CEQA), should be a model of citizens participation, but it is the opposite.

CSUCI was previously advised that the implementation of a schedule for moving this process would prejudice the process and result in flaws.

The Project Description is Inconsistent with the Actual Project.

G The project originally described in the NOP is substantially different from the project now being reviewed. Comments made during that scoping process may not apply for this project. Because of the numerous significant changes, this project should have gone through a new scoping process.

The DEIR Fails to Disclose all of Government Approvals Required for the Project

H An important omission of the DEIR is created by failure to list all government approvals which could be necessary for the project. This prevents interested parties from pursuing information in important areas. It also prevents the sharing of information with other responsible agencies.

The project may require permits from the US Army Corps of Engineers (COE), including Section 404 permits for alterations to waters of the United States.

The Project may also require permits from the US Fish and Wildlife Service (USFWS). Additionally Section 10a of ESA may become necessary for other agencies involved in the project. This may be followed by issuance of Permits to Take, and a formal Mitigation Monitoring program.

The issue of Stream alteration permits from the California Department of Fish and Game (CDFG) was only briefly discussed.

The role of the Regional Water Quality Control Board was not clearly defined.

Many issues relating to the Ventura County Zoning ordinances, General Plan and other Planning guidelines are not addressed.

The Project is Segmented

I The project has been divided into several segments with analysis deferred until a later time, in violation of CEQA.

Surface Water Hydrology and Quality

J The DEIR fails to adequately analyze the likelihood of flooding in the Project area. Construction of East Campus residences would exacerbate the existing problems with runoff. This might cause additional impacts from postponing long term solutions until a later date.

CSUCI

Biological Resources

K

The DEIR has failed to adequately analyze impacts on biological resources. This failure is due in part to the segmentation of the project and its impacts, but also includes a failure to recognize sensitive species and habitats in the project vicinity, and the connections between them. The coastal sage scrub, riparian areas and the wetlands of the project site as well as areas termed ruderal and non-native grasses are functioning habitat for numerous native plant and animal species. Together they serve as part of an ecological system which is essential to the survival of sensitive native wildlife.

The DEIR has completely missed the point relating to the interconnectedness of these different components of the ecological system. Therefore the DEIR plans for preservation of surrounding sage scrub without allowing for the vital connections which can keep the system alive. The result is that the sage scrub supposedly preserved (on paper only) has at its center a vast urban community with all the impacts one might imagine, (noise, lights, glare, smog, human intrusions, and more). These impacts render the sage scrub habitat essentially useless to wildlife. The accompanying mitigation measures are then, void.

L

But if the above does not serve to render the sage scrub habitat values useless to wildlife, (as it surely would) then surely the separation of this habitat from vital water supplies must surely do so. In California water is life for wildlife as well as humans. The preferred plan severs this connection without any substantive discussion as to the effects upon the system or specific species.

M

The DEIR lists only a few of the species that could be effected by the project, and provides incomplete and insufficient analysis on these. The appropriate criteria for determining significant impacts upon wildlife and habitats are misinterpreted and avoided altogether so as to be able to construct language devoid of the honest conclusion that several significant impacts exist which by law ought to be mitigated as best as possible (as defined by CEQA guidelines).

N

The DEIR next needs to investigate the true effects of altering the riparian, ruderal and non-native plant communities. Again the point is missed in assuming that because these areas may have been subjected to alterations, that they are devoid of value or connections to the surrounding habitats. In reality, these "previously disturbed lowland areas" provide forage, nesting, resting, roosting and a whole host of other habitat

CSZICJ

O

uses. Also, they are relatively flat. This is important. Some species may tire of continuously sliding down hill or being confined to some hot dry hillside away from rest and water.

Although altered, these areas may in fact be the most important links in the area's ecological chain. Therefore, the preferred plan's focus on taking the best while staking a claim for preserving the rest, (which is for the most part too steep for buildings) is diminished for its lack of environmental ethics.

P

The DEIR fails to consider the potential effects upon federally listed species such as the peregrine falcon and california gnatcatcher. Alterations in the food chain upon which these and other species depend for survival may result in harm which results in take of these species. The DEIR specifically avoids description of prohibitions that many agencies have from being parties to such activities. The DEIR should start with an explanation of the roles of federal agencies in funding or permitting actions which result in taking federally listed species. The DEIR may then focus on state and local guidelines in this area.

Q

The DEIR relies on mitigation measures that will not in fact reduce the impacts to a level of insignificance. Agencies may not rely on mitigation measures of unknown efficacy in concluding that significant impacts will be substantially lessened or avoided. Nor may agencies defer the obligation to formulate and adopt mitigation measures until after project approval, nor may they defer mitigations to another agency or project. The mitigation measures offered in the DEIR with respect to biological resources violate all of these prohibitions, repeatedly.

R

The DEIR confesses that "extensive field work on the natural hillsides proposed to remain in open space was not conducted," (5.3-1).

S

The DEIR fails to consider direct and indirect impacts to several plant species in the project area. Instead a hurried, cursory treatment is made. Little attempt was made to locate each species or to determine the extent of a species' range. The assumption is then made that the remaining open space creates effective mitigation for all impacts, identified or not. Lacking are reasoned analysis on a number of easily foreseeable impacts like locally produced airborne pollutants which might effect dudleyas and other species.

T

The DEIR should admit that the preferred plan threatens significant impacts upon the following:

Blochman's dudleya.
Conejo dudleya
Verity's dudleya
Conejo buckwheat
Dune larkspur
Catalina mariposa lily
Plummer's mariposa lily
Coastal live oak
Lyon's pentachaeta

U

The DEIR mistakenly states that "no state or federally listed rare, threatened, or endangered animals are known to occur or substantially utilize the habitats available at the site". This assumption is surely based upon the consultant's failure to spot or recognize these species during the one day survey. The conclusion reached is speculative and not based upon substantial evidence. It is further assumed that the urbanization of the project area has no effect upon sensitive wildlife species or that they may survive isolation in the coastal sage scrub.

Special attention ought to be brought to the habitat loss to the peregrine falcon and California gnatcatcher.

Having listed the criteria for establishing significant impacts in CEQA Guidelines Appendix G, the DEIR fails to use these criteria in determining that several impacts exist.

EFFECT BIO-1

V

The DEIR could substitute the word altered for eliminated in the following passage: Past use of the project site for the Camarillo State Hospital and the past agricultural uses associated with the hospital has eliminated the natural plant communities that were formally (read formerly) located in the flatlands of the site," (5.3-13).

W

After listing several plant communities the DEIR concludes "Because these are not natural plant communities, the loss of plant resources within these areas is not considered a significant impact," (5.3-14). The conclusion has no basis in fact. Nor does the following : "Because the type of vegetation to be removed does not uniquely support and sensitive wildlife species and given the abundance of similar type habitats to the east of the project site within the Santa Monica Mountains, the removal of this vegetation does not cause a significant project effect on wildlife resources", (5.3-14).

X

Any sensitive wildlife? Not one sensitive species as per CEQA? Again, what about the links of this community to the

CSUCI

X surrounding area. Are these any? What are they? Does this passage mean that land holders east of the site within the Santa Monica Mountains are obligated to preserve their holdings to insure mitigation? Any agreements? With whom?

Y The DEIR allows conversion of 3.7 acres of Mulefat scrub and 5.4 acres of coastal sage scrub without declaring the impact significant. By what authority? What assurances are there that the area provided as mitigation is not itself subsequently converted?

Z The conversion of approximately 5 acres of wetlands(5.3-15) should be preceded by the required delineation and permits.

MITIGATION MEASURE BIO-1(a)

AA This measure is substantially flawed in that it provides for the preservation of the appendages of the area while allowing for the planned destruction of the heart of the ecological system. While the area may be designated as a biological preserve the loss of the central element renders the habitat values for wildlife as greatly diminished or non-existent. The sheer weight of continuous human impact in this central area is not at all mitigated.

AB Serious thought ought to be given to abandonment of any residential or other development in the area above the campus core. Habitat enhancement of this area then might provide a real benefit to the functional capabilities of the system and to specific species.

BIO-1(b)

AC Wetlands should be replaced on the usual scale of 3:1 or greater.

BIO-2

AD The DEIR states: "Because the Campus Master Plan does not propose any direct alteration to their habitat, no significant impacts on these sensitive species are expected," in reference to sensitive plants within the coastal sage scrub.

Again, direct alteration of the ecological system is contemplated. Indirect impacts are significant. The conclusion made is not supported by substantial evidence.

AE Air pollution impacts directly upon the lichens which support dudleya v. are a significant unmitigated impact. The conclusion that local traffic "would not have a significant effect on local concentrations,"(5.3-130 are not accurate.

CSUCI

AF | Preservation of Catalina mariposa lilies cannot be passed off to other parties.

BIO-3

AG | The statement "no rare, threatened or endangered animal is known to be located on the project site ," is refuted by the Table 5.3-2. Most of these species must use the project site. All these and more should be considered rare (at least) as per CEQA.

BIO-4

AH | The DEIR points out that "the habitats within the link do not necessarily need to be the same as the habitats that are being link", followed by"When habitat linkages are too small or narrow they may collapse ecologically due to encroachment or edge effects". However, the conclusion next made that the project would only partially interrupt the free movement of land animals is not even partially correct. The severance of routes through the project site is a significant impact which has not been mitigated.

AI | The DEIR should have identified a significant impact due to cumulative impacts on biological resources associated with this project. The reference to monies in the proposed state budget offers no specific mitigation as per CEQA.

LAND USE AND PLANNING

AJ | The DEIR acknowledges some, but not all, of the numerous inconsistencies between existing planning guidelines and the project, especially the non-university housing. Because this added use is non-compliant and because impacts may result beyond the vision or control of CSU authorities this segment of the project requires substantially more consideration. Unknown are the requirements and associated impacts created by these elements. Also unknown are by what mechanisms will these units be prevented from transforming into uses not envisioned by CSUCI.

AK | Missing is any acknowledgement that residents have rights which may come into conflict with the planned mission goals. The document seems to be very deficient in this area.

AL | Also missing is analysis of the growth inducing impacts associated with this use which are different from university related impacts

Aesthetics

AM

The DEIR considers light and glare impacts within this category. However, lost are evaluations of impacts on the environment other than aesthetics which may be significant. An example is the effect on area wildlife. With the basin surrounding the project illuminated by artificial lighting comes a complete change in the night time character of the various habitats. Nocturnal animals may alter behavior. Animals dependent upon hiding in the dark may now be visible. These and other issues go to the potential that the habitats which are planned as preserved open space may lose functional capacity for certain species. It is possible that the entire system is altered.

AN

The DEIR Fails to Adequately Analyze Cumulative Impacts.

An EIR must discuss "cumulative impacts" when they are significant. Guidelines section 14130(a). "The cumulative impacts from several projects is the change in the environment which results form the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects." Guidelines, section 15355.

The DEIR's analysis of cumulative effects both fails to analyze the cumulative impacts of identified projects and omits entirely related and critical projects. It thus purposefully minimizes the Project's cumulative impacts and skews the decisionmakers' perspective on the Project.

AO

The EIR Fails to Adequately Analyze Alternatives.

An EIR must describe a range of reasonable alternatives to the proposed project, or to its location, that could feasibly attain the projects basic objectives, and must evaluate the comparative merits of each alternative. Pub. Res. C.,section 21100(d); Guidelines, section 15126(d). The discussion must focus on alternatives capable of either eliminating any significant environmental effects or reducing them to a level of insignificance, even if such alternatives would be more costly or to some degree would impede the project's objectives. Guidelines, section 15126(d)(1).

If properly noticed to the public this project had the prospect of incorporating concepts already known to other responsible agencies and interested parties.

CSZICJ

Investigation of additional alternatives may result in development of an alternative with habitat enhancement values.

AO

The DEIR'S selection of the project related alternatives over the No Project alternative as the environmentally superior alternative is wrong. However a combination of the No East Campus alternative with habitat enhancement measures could alter this assessment.

The EIR Must Be Recirculated.

An EIR must be recirculated for public comment if "significant new information" is added subsequent to public and agency review but prior to certification. Pub. Res. C, section 21092.1. Where the Changes are significant, the revised environmental document must be subjected to the same "critical evaluation that occurs in the draft stage," so that the public is not denied "an opportunity to asses, and evaluate the data and make an informed judgement as to the validity of the conclusions to be drawn therefrom."

AP

Significant new information has been added to the EIR for the Project subsequent to public and agency review of the DEIR. In particular, comments on the DEIR present new information and alternatives.

Conclusion

These comments have addressed only a few of the numerous issues raised by the DEIR due to the time constraints imposed by CSUCI. However, all other comments by all parties are incorporated herein by reference in their entirety, and may be relied on in any future proceedings involving this matter.

My recommendations are that the DEIR should be revised and recirculated along with specific directions from the CSUCI to insure that the best available information is incorporated into feasible alternatives and to insure that a good faith effort at public involvement takes place. Perhaps, you should consider extending the comment period for this draft, as well.

AQ

The non-university related segments of the project are especially troubling. They have diverted and created qualifications for support which could be directed towards the prime goal. They also create significant impacts upon the environment beyond those acknowledged by this document.

Thank you for the opportunity to comment on this project.

Sincerely,

Alan Sanders
Conservation Chair

Letter 24

Commentor: Alan Sanders, Conservation Chair, Sespe Group of the Los Padres Chapter of the Sierra Club

Date: July 20, 1998

Response:

A. Comment states an opinion unsupported by fact. A public Open House and EIR Scoping Meeting, which is not required by CEQA, was held for the proposed project on March 9, 1998 at the project site. This meeting was noticed in the newspapers via advertisements and media releases and was attended by several hundred individuals. Notice of the meeting was also provided on the CSU web site. In addition, CSU staff has coordinated numerous meetings with various resource and services agencies and environmental groups during which concerns regarding the EIR and the proposed Master Plan were stated and considered for inclusion in the CEQA environmental process. The Draft EIR was duly noticed for the standard 45 day review period and review copies of the Draft EIR were available at libraries throughout the County.

B. Comments provide an opinion unsupported by any facts and it is not possible to prepare a reasoned response. Section 3.0 *Project Description* contains 22 pages of text, graphics, and tables that explain the Campus Master Plan in detail. See responses to specific items below.

C. Cumulative impacts were addressed within each of the subject areas using the methodology that was appropriate to the issue area. For example, in the case of traffic, General Plan buildout for those areas near the project site was used in conjunction with buildout of the proposed project to examine the cumulative impacts on the roadway system. Section 4.3 of the EIR contains a discussion of the cumulative impact methodology and a list of pertinent projects in the vicinity of the site. For traffic, an additional list of projects is contained in Table 5.10-3.

D. The EIR preparers disagree with this comment. The EIR includes an analysis of two versions of a no project alternative, three alternative site alternatives, and four alternative master plan concept alternatives; a total of nine alternatives that provide an extensive range of alternatives. Because the alternative sites were subject to a prior extensive EIR evaluation (which was incorporated by reference into this EIR and so is an integral part of the current documentation), the alternatives are far more detailed than that which is required under the CEQA guidelines. It is noted that even with the extensive public involvement provided for the scoping of this EIR, the only alternative proposed for the project was that the site only be used for a university, with no revenue -generating ancillary uses. This alternative was subsequently examined in Section 7.3.3.

E. The commentor recommends that the CSU Board of Trustees reject certification of the EIR. The opinion is noted; no response is necessary.

F. Comment provides no factual basis for its assertions of lack of adequate noticing. See response to comment A above and the material contained in Appendix A of the EIR.

G. The project as described in the EIR is that which is under consideration at this time. Contrary to the opinion of the commentor, the project description does not differ substantially from that which was contained in the Notice of Preparation (see Appendix A of the EIR).

H. As stated in Section 3.6 of the EIR, the only required discretionary action at this time is the approval of the Campus Master Plan and proposed initial renovations of the existing buildings by the CSU Board of Trustees. Potential Army Corps of Engineers approval of future 404 permits is delineated on page 3-8 of the EIR. No circumstances are known to exist at the site in connection with the proposed project that would require a permit from the US Fish and Wildlife Service under the Endangered Species Act. The potential need for a Streambed Alteration Agreement from the California Department of Fish and Game was disclosed also on page 3-8. The role of the Regional Water Quality Control Board is contained within its own implementing regulations and CEQA does not require an EIR to include such information. Issues pertaining to the County's role in regards to land under State jurisdiction was discussed within the EIR.

I. The proposed project under consideration is that of a Campus Master Plan, which by definition is the whole of the long term development plans that the CSU currently has for the property. The project has not been segmented into pieces, rather the various implementation phases of the long term growth of the University campus have been disclosed.

J. Effect HYD-3 on page 5.6-8 of the EIR specifically discusses that the residential development proposed for the East Campus area could result in increased flooding of agricultural lands adjacent to the site. Mitigation measures are included to reduce this impact to a less than significant level.

K. As stated in the EIR, the ruderal portions of the site have been undergoing active management for more than 60 years as development of the hospital proceeded and the project site and much of the surrounding areas were converted to agricultural uses. The State has continued to actively manage the lower, flatter portions of the site through mowing for weed and fire control purposes. While these areas provide some functioning habitat for plant and animals, as do all areas including hardscaped, densely urbanized cities, the relative biological importance of the species present is very low as compared to the more natural hillsides that adjoin these areas. All plant and animal associations are interconnected to some degree, and they are dependent on the physical environment, which is the basic definition of the word "ecosystem." In this instance, the hillsides of the project site have been exposed to an urban use, a state hospital with a former peak population of over 7,000, for several decades, and yet have substantial wildlife populations. The impacts, both of the project and cumulative growth expected in the area, would not render the sage scrub communities "essentially useless to wildlife." Far smaller patches of habitat have sustained wildlife populations for many

years; for reference please see M.E. Soulé, et. al. Reconstructed Dynamics of Rapid Extinctions of Chaparral-Requiring Birds in Urban Habitat Islands, *Conservation Biology, Vol.2, No. 1, March 1988*. In addition, the sage scrub habitats at the site would not be isolated from the much greater extent of this habitat to the east. Further more, the EIR includes mitigation measures relative to growth inducement that would aid in helping to maintain this linkage (Please see measures GI-2 and GI-3 in Section 6.1).

L. The animals that exist within coastal sage scrub are adapted to semi-arid conditions and are not dependent on free water sources. Those animals that require water, such as foxes, coyotes, and mule deer, are sufficiently mobile to access water sources over large distances. In addition, the past development of the area as a hospital has introduced extensive water sources to the area that were not part of the natural environment. These water sources include sprinkler irrigation systems and runoff from irrigation. The proposed project would not eliminate such water sources from the area.

M. The Draft EIR text discusses specifically those species that are considered rare enough by local regulatory agencies to warrant additional discussion of the potential project impact on their populations. For a complete list of species that may occur within the site, please see Appendix C. The impact on the generally common species is discussed on a habitat basis under Effect BIO-1. The significance thresholds contained within the EIR are taken from the *State CEQA Guidelines* Appendix G and, in the biological opinion of the EIR consultant, are interpreted correctly.

N. The EIR discusses the true impacts of the proposed project rather than those that may be speculatively assumed to occur. Animals that live in hillside areas are adapted to the terrain and do not "tire of sliding downhill." If they were to so tire, there are sufficient ledges, ridgelines, and other level spots within the hillside terrain where they can rest. Please see responses to Comments 24K and 24L above.

O. The peregrine falcon would occur at the project site only as a rare transient because suitable nesting locations are not present within the site and its primary food source in the area is small shorebirds, which are not present at the site. The bird is included in the list of species potentially occurring in the area because of personal observation of this species by a Rincon Consultants biologist at Mugu Lagoon, which is offsite at some distance from the project location. If peregrine falcons had previously been nesting at the site, "whitewash" from their nesting sites on cliffs would have been seen or the animals otherwise discovered and that information made available through the California Natural Diversity Data Base or via discussions with local regulatory agencies. If peregrine falcons nested at the site or used it frequently, the presence of this large, fast moving raptor would have been readily apparent even during a brief survey.

The California gnatcatcher is not known to occur in the project area, with the nearest known nesting pair located more than nine miles north of the site. The nearest known population that appears to be sufficiently large to sustain itself is on the Palos Verdes Peninsula in Los Angeles County, with the vast majority of this species' known population lying within the Counties of Orange, Riverside, and San Diego. The local

Audubon chapters conduct regular walks in the western Santa Monica Mountains and informal bird-watching trips by Audubon Society members and other knowledgeable people within the national and state parkland in this area has failed to identify this species as occurring in the area. Further, the primary reason for listing of this species is the loss of habitat. The proposed project would retain potentially suitable habitat within an open space designation, which would serve to maintain this species presence or its habitat at the site should it either be present or should it successfully disperse to the site from other locales. It is noted that this species successfully persists within open space area within urban development where the size of the preserve is sufficiently large to protect it from the depredations of feral cats. The Rincon Consultants biologist who prepared this section has personally observed this species less than 200 feet from extensive suburban development that was constructed more than 30 years prior to the observation. Based on the provision of an open space area around proposed new construction, the maintenance of almost all of the coastal sage scrub vegetation on the site within designated open space, and the lack of any known population of this species in the area, the proposed project would not have a significant effect on this species.

The EIR does not "avoid descriptions of prohibitions" related to endangered species, rather this information is not necessary to discussing the potential for significant impacts and such is within the regulatory control of those agencies empowered to enforce the state and federal Endangered Species Acts. The primary "prohibition" that such agencies seek is the avoidance of development within the habitat of endangered species. The design of the Campus Master Plan complies with this primary mitigation action, as discussed above. Since the proposed Campus Master Plan would not result in the potential for "take" of a state or federal listed species, there is no need to discuss this issue. It is noted that neither the California Department of Fish and Game nor the U.S. Fish and Wildlife Service, the two agencies responsible for protection of endangered species, provided any comments regarding the proposed project, nor did they indicate that the project could occur in significant impacts on endangered species.

P. The comment provides no specifics regarding what mitigation measures the commentor is referring to, nor why those measures are deficient; subsequently, no further response is necessary or possible. Because this report is a Program EIR on a conceptual Master Plan, the mitigation measures are similarly programatic and intended to reduce significant impacts as the potential for them occur over the long period of time necessary before the project is build-out. This is in keeping with the direction provided for Program EIRs in Section 15168 of the *State CEQA Guidelines*. For the type and nature of impacts that are likely to occur as this previously developed site is redeveloped, the mitigation measures contained in the EIR are effective to reduce the impact.

Q. Comment includes information provided in the EIR text. Since the purpose of an EIR is to identify the potential for significant impacts, extensive biological field work in locations where no actions are proposed to occur and where there is no potential for impact is not necessary.

R. The purpose of an EIR is to determine and report the potential for significant impacts, not to conduct a scientific study on the extent of a particular species' range. The EIR analysis and field study were focused on those areas where there was a potential for the Campus Master Plan to cause a significant effect due to a change in the physical environment; this does not include examining areas that are remote from the physical change to the environment. The areas where development is proposed by the campus Master Plan were examined and characterized regarding those species that occur within those areas. Given the fact that these areas have been continuously maintained for several decades, it is not surprising that these areas were dominated by non-native species.

The commentor speculates without any documented facts that locally produced air pollutants might specifically harm rare and endangered plants within the project site. As discussed in the EIR, it is known that certain lichen species are sensitive to low concentrations of sulfur dioxide. However, the mobile sources associated with the Campus Master Plan are not a significant producer of this air pollutant. The other primary air pollutant of concern regarding plants is ozone. The formation of ozone is not a local issue, rather it involves complex chemical interactions that occur over time within air masses vastly larger than the project site. Please see the discussion in Section 5.2 regarding the project's impact on air quality.

S. The potential for impacts on these species has been specifically addressed in the EIR. The commentor provides no basis for the opinion that the Campus Master Plan would result in significant changes in the populations of these plant species.

T. Those portions of the project site that would be subjected to substantial physical alteration do not contain the habitats necessary to support state or federally-listed animal species that are known to occur within the area. Table 5.3-2 of the EIR contains a list of those species considered sensitive, only two of which are listed as rare or endangered. See response to comment 24O above regarding both of these species.

U. The word "eliminated" is correct since natural plant communities no longer exist in the flatlands. Typographic error will be corrected in the Final EIR text.

V. The basis for fact in this conclusion is that important plant resources from a botanic viewpoint are defined by their rarity or the existence of natural associations and groupings that provide scientific value and significant wildlife resources. These are both lacking in fields that are continuously maintained by mowing and discing and have been for several decades. Similarly, the resources available in such habitats are marginal, as are the wildlife populations that occur in these locations. The presence of extensive amounts of this type of habitat elsewhere testifies to the lack of its rarity, which is an important consideration in determining significance.

W. As stated in the EIR text, this type of habitat does not uniquely support any sensitive wildlife. In other words, none of the animals listed in Table 5.3-2 occur only within the ruderal vegetation, annual grassland, or laural sumac grassland such that, if present at

the site, they would become extirpated at the site due to the loss of this habitat. It is unknown what "linkage" the commentor is referring to. These habitats do not contain a critical resource for sensitive wildlife that "links" this habitat to the adjacent natural communities. If the commentor is referring to linkage with other habitats to the east of the site, these already exist and will continue to exist because the adjacent properties lie within open space zoning and little, if any development, can occur in that area, unless the Ventura County Board of Supervisors chooses to change the land use designation. See Section 6.0 for further discussion of this issue. Additional landholders further to the east are the National Park Service and State Department of Parks and Recreation, and these landholders are obligated to preserve their holdings.

X. The EIR specifically states that loss of 3.7 acres of mulefat scrub is a potentially significant impact (see page 5.3-14, paragraph 4). The loss of disturbed coastal sage scrub is not considered significant in the biological opinion of the EIR consultant based on the criteria established in the EIR. If the replacement wetland that mitigated this impact were to be removed, it would require subsequent environmental documentation and similar mitigation requirements would be imposed.

Y. At such a time that the area west of the canteen is to be developed, a specific wetland delineation will be prepared as required by Army Corps of Engineers regulations under Section 404 of the Clean Water Act, as discussed in the EIR text. Since this is already a required action, it is unnecessary to include it as a mitigation measure.

Z. Contrary to the commentor's opinion, the heart of the biological ecosystem at the site is the natural hillsides containing coastal sage scrub habitat. This is the area that contains the highest diversity of plants and animals, and is the home of rare and endangered dudleya species. The habitat values within this area for plants and animals will remain virtually unchanged due to the proposed Campus Master Plan, where most of the project will occur via the adaptive re-use of more than 1.6 million square feet of developed space and where 900 residential units are proposed to occupy land currently containing disced and mowed fields and over 400 residential units.

AA. The East Campus is already developed; it contains over 400 residential units and the Children's Developmental Facility. There is no nexus for a requirement of habitat enhancement. For a discussion of no additional construction in this area, please see Section 7.3.4 *No Redevelopment of East Campus.*

AB. The opinion regarding wetland replacement ratio is noted. The regulatory agencies will determine the appropriate amount of mitigation at such time that wetlands are proposed for alteration and have been precisely delineated.

AC. The commentor offers no evidence that indirect impacts are significant. The plants that are listed in Table 5.3-1 all occur within sage scrub habitat, which at the site will remain in open space. Micro-habitat features (such as slope, slope aspect, soils, moisture regime, etc.) related to the specific location of these plants is the controlling characteristics to their continued existence at any specific location. These physical

characteristics would not be affected by the type of development proposed by the Campus Master Plan. For example, the threatened Verity's dudleya was found at the site about 20-30 feet from an irrigated field which the Campus Master Plan proposes for a similar recreation/open space use. Because this rare plant population has persisted adjacent to such a use for many years, it is reasonable to presume that it will continue in the absence of more direct impacts, such as grading. Response to Comment 24R above discusses the only indirect effect raised by the commentor, namely that of air pollution.

AD. The opinion is noted. See response to Comment 24R above.

AE. The opinion is noted. The Catalina mariposa lily is not a threatened species, rather it is on the California Native Plant Society's "watch list." Extensive stands of this plant are still present throughout Ventura County, including within land that is already protected through conservation easement and as undeveloped parkland. Loss of the plants at this location would not be sufficient to substantially reduce population levels of this plant, which is the criteria recommended by the *State CEQA Guidelines* Appendix G. Nonetheless, the EIR recommends that the recreation/open space land be designed to accommodate this plant or that the bulbs be removed to a suitable location within the site at the time of development.

AF. Only two of the species contained in Table 5.3-2 meet the criteria of "rare, threatened, or endangered" as listed by the regulatory agencies under the state and federal Endangered Species Act: the peregrine falcon and the California gnatcatcher. Neither are likely to occur or substantially utilize the habitats at the site. Please see response to Comment 24O above also. The commentor is correct in that several of the other sensitive species (not "rare" species as this has a specific regulatory definition) are likely to occur at the site, as discussed in the Draft Program EIR text.

AG. Encroachment and edge effects vary depending on the species being examined, with larger, more mobile species tending to be able to use smaller links (a few feet wide) than smaller organisms in which it is the population that uses the link rather than the individual. In general, habitat linkages have typically been considered adequate for most species if they are at least 100 - 200 feet wide, though obviously the larger the linkage the more effective it can be. The Proposed Campus Master Plan would reduce the free movement of wildlife across the open ruderal fields and grasslands in the East Campus area. The wildlife that have been observed using this area to move between the hillsides on the project site and the lands to the east are large, mobile mammals, including deer, bobcat, and fox. The 30-foot wide Long Grade Canyon channel through the East Campus will continue to serve this linkage function for these animals. In addition, habitat linkage to the open space lands east of the project site will continue to be served by contiguous and continuous open space along the north border of the site, where a minimum 450-foot wide strip of land within the project site would remain. If land within Camarillo Regional Park that are planned to remain in open space are also considered, this linkage widens to over 800 feet. For these and other reasons, the effect on wildlife movement patterns is not considered significant, as stated in the EIR text.

AH. The mention of state funds is not intended to serve as a mitigation measure, but is factual information for the EIR reader. It indicates that the State is resolving the cumulative impact issues concerning this plant community. The cumulative impact of redeveloping an existing use and changing ruderal field and non-native grassland to suburban uses is not considered a significant cumulative impact on regionally important plant, animal, and natural biological communities.

AI. The comment does not indicate what other inconsistencies have not been identified, therefore a reasoned analysis and response is not possible. Assuming that the comment is in regard to the status of the Site Authority, this will not be fully resolved until the State Legislature makes a decision regarding this legislation. With regard to the site, the CSU and the County of Ventura have agreed to develop a Specific Plan based on the Campus Master Plan that will resolve the issues of inconsistency between County planning documents and the proposed uses. If impacts are identified as part of this process that occur beyond those envisioned in this Program EIR, subsequent environmental documentation will be necessary. The Specific Plan will also develop specific mechanisms that control the methods by which residential units could be transformed if such is to be allowed. It is noted that the CSU will not be selling the land that underlies the proposed residential units; the land will be retained within State control. It should be further noted that the majority of the actual proposed land uses, namely residential, office, and limited services, have occurred for decades at the site under a public agency administration.

AJ. It is unknown what "residents" this comment refers to, as is the "rights" that they have. Besides staff of the CSU, GSA, and CCC, there are no residents within the site. These personnel are being provided employee housing and have no specific rights such as might be contained within a lease agreement with a landlord. Further response is not possible.

AK. Growth-inducing impacts were extensively discussed in Section 6.1 of the Draft Program EIR.

AL. As stated in the EIR, the project site is already illuminated at night, virtually throughout the area proposed for development by the Campus Master Plan. No substantial changes in illumination in the campus core are anticipated, but additional lighting is proposed for the entry road to the site, which passes by agricultural land, mowed fields, and sage scrub. The amount of light from this roadway would not be sufficient to interrupt wildlife movement through the area, as evidenced by night movement of animals through the campus observed by Rincon Consultants biologists. There will also be sufficient buffer area between the residential development proposed in the East Campus area and adjacent natural habitats to reduce illumination to tolerable levels for the animals. See response to Comment 24AG above regarding the width of available movement pathways. In addition, mitigation measures AES-3(a), (b), and (c) are intended to reduce the nighttime lighting effects that are the concern of this comment.

AM. Cumulative impacts were considered in each issue group where potentially significant, generally as section 5.x.2(c).

AN. See responses to Comments 24A & 24D above. Habitat enhancement is not an objective of the project (though the proposed project will serve to protect important plant and animal habitat indefinitely) and is not a requirement of CEQA. It is noted, however, that the provision of an alternative funding mechanism for this campus per Section 89009 of the Education Code, which is the purpose of the development in the East Campus area, is an objective of the project (see Section 3.5 of the EIR). To the extent that development of open space and recreational area landscaping and residential landscaping will introduce more trees to the area, the proposed project would serve to "enhance" habitat by providing additional vertical habitat for those avian species capable of utilizing it to the disadvantage of ground-dwelling species (primarily ground squirrels in the mowed fields). The opinion regarding the comparative merits of the "No Project Alternative" is herein noted to the decision-makers.

AO. Opinion noted. Comments in themselves do not constitute new information requiring recirculation of the Draft EIR. No significant or substantial new information has been added to the Final EIR that would require recirculation.

AP. The commentor's input and opinions are noted. The EIR preparers disagree that significant impacts related to the East Campus portion of the site were not fully discussed. These comments are included herein to notify the decision-makers of the commentor's concerns and opinions regarding the proposed Campus Master Plan.

C

Comment Sheet

Please provide any input on the analysis presented in the EIR...

Name: Robert A. Silva
Affiliation (optional): Member of National Trust & Dudley House restoration (Food Services) Resident of Camarillo Heights/V.C. Student worker
(resident, businessperson, community group)
Address: 557 Mesa Drive
Camarillo, California 93010-2208
Phone: (805) 482-2651

I and my Mother (Elvira S. Silva) decided to not miss our last chance to walk around the park like & architecturally significant Camarillo State Hospital (circa 1935-1997) site before restoration or renovation as the Future C.S.U.-Channel Islands.

We were very impressed with this "Little city of 1936" and very much believe in its reuse for C.S.U.-Channel Islands. I recommend that the National Register of Historic Places [redacted] listing process be started since Federal money may be available for restoration/renovation of this site which is more than 50 years old and architecturally significant. I hope all buildings could be reused or adapted. The old laundry, powerhouse, employee dormitory seem to be questionable? I do hope the State of California will make the immediate funding of this project available as soon as possible without further delay.

I was personally trying to see the Food Service area (Cafeteria) as that has been my major employment area at Ventura College (10 years) of the last 20 years both as Dishwasher and Vending Machine Attendant. AS I am currently un-employed I can [redacted] see many jobs available in the future here. If I can be of assistance historically speaking please call me at (805) 482-2651.

Thank You!

Robert A. Silva

Please leave with staff, or send by July 21, 1998 to:

Environmental Review
California State University, Channel Islands
P.O. Box 2862
Camarillo, California 93011-2862
Attention: George Dutra

California State University, Channel Islands

CSUCI

Letter 25

Commentor: Robert Silva

Date: No date. (June 23, 1998 Public Meeting)

Response:

A. Commentor notes that the project site is architecturally significant and recommends that the site be listed on the National Register of Historic Places. Comments are noted for the decision-makers; no response is necessary.

Mike Stubblefield
1230 East Collins Street
Oxnard, CA 93030

(26)

The Trustees of the California State University
400 Golden Shore
Long Beach, California 90802-4275

The response of the Sierra Club's Los Padres Chapter to the projected air quality impacts of the proposed California State University, Channel Islands campus

I am the air quality issues spokesman for the Los Padres Chapter of the Sierra Club, which represents thousands of members in Santa Barbara County and Ventura County. After reviewing the projected impacts of the proposed California State University, Channel Islands (CSUCI) on the air quality of Ventura County, and after discussing these projections with the chapter executive committee, I have been asked to express the concerns of the chapter in the most emphatic possible terms. While the Los Padres Chapter of the Sierra Club wholeheartedly endorses the creation of a California State University campus in Ventura County, we are seriously concerned about the unavoidable degradation of our air quality that will result from the day-to-day operation of this campus *as it is currently envisioned.*

Projected NOx and ROC emissions exceed the APCD's AQMP guidelines

A

As the Environmental Impact Report (EIR) produced by Rincon Associates, Inc. makes abundantly clear, the projected daily increase in oxides of nitrogen (NOx) and reactive organic compounds (ROC) that will be generated by a fully operational CSUCI campus is about nine or ten times the daily maximum allowable amount of either substance permitted by the 1994 Air Quality Management Plan (AQMP) prepared by the Air Pollution Control District (APCD) and approved by the County Board of Supervisors.

Projected NOx and ROC emissions are unhealthy

B

NOx and ROC are classified as ozone precursor emissions, because when combined with sunlight, they produce ozone, which is a serious threat to public health. It causes a number of respiratory ailments - coughing, choking, headaches and severe fatigue - in infants, the elderly and people engaging in outdoor exercise.

Ventura County is still out of compliance with state and Federal ozone standards

C

Because of the NOx and ROC emissions currently produced by mobile and stationary sources already present in Ventura County, the Environmental Protection Agency (EPA) classifies this county's air pollution problems as "severe" (the same category used to characterize Los Angeles and Sacramento). Indeed, 18 *years* after it was supposed to have achieved compliance, Ventura County is still out of compliance with state and Federal ozone standards. Although the 1994 AQMP projects attainment of compliance early in the next century, a project of the magnitude of the CSUCI campus is a serious threat to the timely achievement of this goal, unless the projected NOx and ROC emissions can be fully mitigated at the campus site or elsewhere.

1

CSUCI

The mitigation measures proposed in the EIR are good, but inadequate

Although some excellent mitigation measures have already been proposed in the EIR (see p. 5.2-9), "project-related emissions will still remain above APCD significance thresholds," according to Rincon Associates, even if all of these measures are employed, which means that impacts to regional air quality will still be "considered significant and unavoidable" (see "Significance after Mitigation" on p. 5.2-9). D

About half of the NOx and ROC emissions currently produced in Ventura County is generated by stationary sources (such as manufacturing and powerplants) and about half is generated by motor vehicles. Historically, businesses and the utilities companies have been fairly cooperative in implementing new technologies (selective catalytic reduction, for example) that help reduce their NOx and ROC emissions. On the "vehicle side" of the equation, however, results have been mixed. Automobile manufacturers have reduced vehicle emissions by over 90 percent in the last 30 years. But there are three times as many people - and cars - in Southern California in 1998 as there were in 1968. And there are still many older vehicles driving around without state-of-the-art emission control equipment. More importantly, a significant portion of the NOx generated by mobile sources comes from diesel trucks, not from automobiles. And diesel trucks are, of course, the lifeblood of any large commercial, industrial or educational facility that depends on daily deliveries of the goods and services it needs to operate. E

The Los Padres Chapter of the Sierra Club feels strongly that the proposed mitigation measures in the CSUCI EIR don't go *nearly* far enough, either in terms of getting faculty, staff and students out of their vehicles, or in terms of reducing or eliminating all unnecessary truck traffic.

Additional measures that can be used to reduce CSUCI's NOx and ROC emissions

The reason that a large institutional facility such as a university generates such significant amounts of ROC is because of the number of "cold starts" produced by the vehicles used by faculty, staff and students to get to and from campus. A properly-tuned and maintained gasoline engine in a modern vehicle actually produces few emissions, *once it's warmed up.* It's during this warming-up phase that an engine emits the majority of its ROC (carbon monoxide and hydrocarbons, mainly). A driver who goes shopping for bread or milk is seldom in the store for more than 15 or 20 minutes, so the engine is still warmed up when it is restarted. But when that same driver goes to school, he or she is in class for hours. By the time the engine is restarted, it's cooled off and must be warmed up again, during which time it emits more ROC. So, the strategy of all mitigation measures is simple: they must reduce the number of vehicle trips to school. The Los Padres Chapter of the Sierra Club therefore proposes the following mitigation measures: F

- The ideal mode of transportation for faculty, staff and students is the bicycle. A bike is healthy, inexpensive and fun. This is not a new idea. At campuses such as UC Berkeley and UC Davis, bicycles have long played an important role in reducing vehicle traffic, congestion and emissions.The Oxnard Plain is totally flat. There is no reason an able-bodied student or faculty member couldn't bike to school from Ventura, Oxnard or Camarillo (especially Camarillo!). All it takes is a commitment G

from the county to build an established network of safe bicycle routes from the major urban areas to the campus. In view of the emission reductions that could be effected by a significant portion of the faculty and student body biking to campus, this strategy should be a major component of a mixed-transportation plan.

- Charge higher-than-normal fees for parking permits as a financial disincentive to students driving vehicles to school. For example, the current parking fee at Cal State Northridge is $63. Double that fee for CSU, Channel Islands students. Use the money to finance a free, or inexpensive, county-wide shuttle bus system.
- Support this program of a parking fee-subsidized shuttle bus system with an ad campaign extolling the virtues of leaving your car at home and helping to keep the air clean by taking the shuttle (combined with a negative campaign aimed at those who insist on their "right" to drive a car to school regardless of its impact on the environment).
- Offer preferential (earlier) TTR registration dates, bookstore discounts on textbooks, discounted tickets to cultural events, and/or similar perks, for students who agree to leave their cars at home and take the bus.
- In this county, the goal of the typical "trip reduction" program mandated by the APCD on businesses with over 200 employees is an "average vehicle ridership" (AVR) of 1.5 to 1.75 persons per car. Using that figure as a rule-of-thumb guide, the university could employ strategies designed to encourage drivers to share their cars. For example, offer preferential (closer) parking spaces to drivers based on how many people they bring to campus. In other words, a driver who provides a ride for one other student would be given a better spot than someone who drives alone; a driver who brings two students to campus every day would be given an even better spot; etc.
- One way to get people out of their cars is to refuse to provide them a place to park! If, as CSU officials claim, Camarillo State Hospital once had 7000 staff and residents, there must already be thousands of parking spaces. So, set a goal of "no new parking lots" at CSUCI, and stick to it! This strategy has been an important part of the revitalization occuring in many cities such as Portland, Oregon. Sometimes people will refuse to give up their car even when they are provided with reasonable alternatives such as bicycle paths, shuttle buses, ride sharing, etc. If no new parking lots are built, the university must "make do" with the spaces that it already has. These spaces then become valuable commodities which can used as rewards to drivers who ride share, or to students who ride to school on motorcycles (less space, less emissions), or who drive electric vehicles, or who share a parking space (one occupant uses it in the morning, another use it in the afternoon, perhaps another uses it at night). After spaces have been allotted to students who choose more responsible modes of transit such as those mentioned above, the remainder can be auctioned off to less responsible drivers who choose to continue driving to school alone. This money can be used as a subsidy for free shuttles.
- Establish off-campus interactive multi-media learning centers in the major metropolitan areas (Ventura, Oxnard, Camarillo, Thousand Oaks, Simi Valley, etc.) where students can go to "attend" large lower-division lecture classes. For example, a Western Civilization history course at CSUN typically has 175 students. In this type

of class, there is little interaction between the teacher and the students. It is strictly a lecture class. The student can learn the material just as well by watching it on TV and taking notes (and perhaps learn it even better, since the video can be taped and replayed!). Questions, problems, paperwork, exams, etc. are handled by three or four teaching assistants. There is little reason to go to campus to take this type of course unless a student needs to discuss something with one of the TAs, who are usually available on three or four different days, allowing the student the flexibility to combine an office visit with a trip to campus for some other class. Savings: 175 trips to campus eliminated.

- Schedule classes at "non-peak" hours when commuter traffic is lighter (mid-morning, mid-afternoon, evenings, weekends). The patterns of peak NOx and ROC emissions are well-established. There is no justification for a large institution such as CSUCI exacerbating this problem by adding more drivers to the roads during peak emissions periods. Evenings are particularly desirable because the third constituent of ozone formation - the sun - is missing, allowing whatever emissions do occur to dissipate before morning.
- Eliminate Monday-Wednesday-Friday (MWF) and Tuesday-Thursday (TTh) classes wherever feasible and replace them with once-a-week three- or four-hour classes. This strategy eliminates the number of trips to campus. So too can scheduling lecture/lab classes so that the lab immediately follows the lecture (instead of forcing the student to come back again on another day, or later the same day, for a lab).
- Schedule classes within a particular discipline so that students can attend half, or more, of their classes each time they come to campus, instead of driving back and forth between home and school many times a week. This strategy is particularly important if CSUCI is going to be successful in encouraging students to employ more time-consuming modes of getting to school such as bicycling or shuttle buses. The time lost getting to and from school isn't such a big sacrifice if it's a once- or twice-a-week excursion, instead of a daily one.
- Where feasible, allow faculty, staff and students to "telecommute" from their homes, utilizing fax, e-mail, the internet, interactive software, etc. For instance, if basic research materials in the school libraries were made available electronically, trips to campus to do research in the library could be reduced or eliminated. A lot of examinations could be done at home and "turned in" without actually going to school.
- Finally, reduce the number of diesel truck trips to and from the campus. Because of their high combustion temperatures, diesels produce far more NOx than gasoline engines. Where practicable, award contracts to companies which agree to use late-model, gasoline-powered vehicles. When it's necessary to do business with companies using diesel rigs, encourage them to use state-of-the-art vehicles with electronic fuel injection and engine management systems. Try to avoid companies which use older diesels with no emission control systems. These older trucks are a significant source of Nox. This last strategy will be particularly difficult to implement because diesel trucks in this country are, essentially, unregulated. Had they been subjected to the same regulatory ovesight as passenger vehicles in the late Sixties, many of the NOx-related problems confronting us today would already be solved.

H

- Create a graduate transportation-planning department that develops, studies, tests and implements programs such as the ones briefly described above. Give this department a mandate to create innovative programs that can help CSUCI and Ventura Country achieve their goals of cleaner air for everyone.

Conclusion

Obviously, this list is incomplete. But it's based on reasonable and practical things we know will work. After all, many of us in the Sierra Club are ourselves students and/or teachers! And while we endorse a new CSU campus in the county, we want it to be part of the solution to our air quality problems, not part of the problem. In fact, we don't just want it to be *part* of the solution; we want it to play a leading role in helping us clean up our skies. Clearly, if the dream of a CSCUCI campus becomes a reality, it will be confronted by a formidable array of air quality issues that can only be resolved by diligent, sincere and smart efforts on the part of everyone involved.

Mike Stubblefield
Sierra Club, Los Padres Chapter
Air Quality Issues Spokesman

Copies to:
California State University, Channel Islands
P.O. Box 2862
Camarillo, California 93011-2862

Rincon Consultants, Inc.
790 East Santa Clara Street, Suite 103
Ventura, California 93001

Letter 26

Commentor: Mike Stubblefield, Sierra Club, Los Padres Chapter, Air Quality Issues Spokesman

Date: No date (June 23, 1998 Public Meeting)

Response:

A. Comment repeats information from the EIR; no response is necessary.

B. Comment states factual information regarding health hazards of air pollutants; no response is necessary.

C. Comment notes that Ventura County air quality does not comply with the ambient air quality standards; no response is necessary.

D. Comment cites information from the DEIR text; no response is necessary.

E. Comments noted. See response to Comment H below in regards to the addition of mitigation measures to the EIR text.

F. The CSU is developing a range of transportation demand management strategies and other air pollution reduction strategies to reduce the potential for air pollution. In particular, the Campus Master Plan includes a range of land uses that could accommodate the needs of students, faculty, and staff on campus, thereby reducing the potential for air pollutant emissions by eliminating trips. These uses include not only employment centers for research and development operations, but housing and ancillary retail uses to serve the campus and residential community, as stated in Section 3.7 of the EIR. The campus is also intended to serve 3,250 FTES at campus buildout through distance learning centers, thereby eliminating 7,735 potential trips and consequential air pollutants.

G. Comment notes that bicycle transportation should be used as an important transit mode for the campus. As noted in this comment, the establishment of safe bicycle routes is a responsibility of the County of Ventura. It is expected that a bicycle master plan will be developed for the campus in the future. In the project area, the establishment of safe bicycle routes would require several road widenings to provide for adequate space for bike lanes. As noted in the EIR, such widenings may have significant impacts to agricultural resources noise, water quality, and air quality.

H. Commentor provides a list of recommended trip reduction strategies for use by the CSU. These alternative strategies are noted to the decision-makers. Mitigation measure AQ-2(a) has been modified to recommend that the Trip Reduction Program specifically evaluate initially those optional strategies that appear to be the most feasible and effective for reducing trips and thereby decreasing air pollution emissions. A requirement for annual re-evaluation of strategies has also been added to measure AQ-

2(a). Please see Section C of this report for the text revisions. However, even with effective incorporation of these measures, mobile emissions associated with build-out of the campus would still exceed the Ventura County thresholds and air quality impacts will remain a significant and unavoidable consequence of the proposed project.

SECTION B. REVISED SUMMARY

This section summarizes the characteristics of the proposed Master Plan, the environmental impacts, mitigation measures, and residual impacts associated with the Master Plan and cumulative development, and the alternatives assessed in the EIR. It also discusses those areas of public controversy associated with the project and the issues that remain to be resolved. This section has been revised as a result of responses to comments and modifications/clarifications of EIR text. Additions to the text are shown by underline such as accompanies this sentence. Deletions are noted by strike-through type.

B.1 PROJECT SYNOPSIS

B.1.1 Project Sponsor and Lead Agency

The Trustees of the California State University
400 Golden Shore
Long Beach, California 90802-4275

Locally represented by:

California State University, Channel Islands
P.O. Box 2862
Camarillo, California 93011-2862

B.1.2 Project Objectives

The California State University (CSU) is a state-funded system of higher education comprised of 22 campuses, each with its own curriculum, faculty, and administration. The system is governed by the California State University Board of Trustees and the chief executive officer is the Chancellor.

The primary mission of the CSU is to offer undergraduate and graduate instruction through the master's degree in the liberal arts and sciences, and professional education, such as for the teaching and nursing professions. Admissions priority is given to upper-division transfers from community colleges and freshmen from the top one-third of the state's high school graduating class.

Each CSU campus is a statewide institution serving the instructional mission as described above. Location of campuses in, or close to, population concentrations throughout the state provides the important element of regional access, which is most critical to students who are least mobile and who otherwise would not have the opportunity to complete their college education. This group includes students who have low incomes (or whose families have low incomes), who are first generation in their family to attend college, who are transfers from local community colleges, who attend part-time because they have work or family responsibilities, and who are older than typical college aged students.

Regional access considerations have led the CSU to seek a potential campus site in Ventura County. The CSU has expressed a number of specific objectives to be met in undertaking the proposed project. These include:

- *To develop a CSU-owned site for the Off-Campus Center (OCC);*
- *To provide sufficient land for the eventual transition of the OCC to a full-service, four-year university campus;*
- *To provide undergraduate and graduate programs to students in the Ventura County region;*
- *To meet the intent and spirit of Senate Bill 1103 (Hart 1985) and §89001 of the Education Code, which is to provide expanded educational opportunity to the citizens of Ventura County;*
- *To provide educational opportunities to eligible high school graduates of the region;*
- *To provide increased opportunity for community college transfer students in the region;*
- *To provide an educational, cultural, and recreational facility which will serve all of the citizens of the region, including those currently underrepresented in the CSU;*
- *To provide for increased capacity within the CSU to meet projected statewide needs (tidal wave II population growth forecasts);*
- *To provide for beneficial reuse of an existing major State facility;*
- *To maintain the historic nature of the on-site buildings; and*
- *To provide an alternative funding mechanism per § 89009 of the Education Code to support the University in meeting the above objectives.*

The CSU has named the proposed facility CSU, Channel Islands. Full build-out of the proposed Campus Master Plan would provide facilities to accommodate 15,000 FTES, with 11,950 FTES served onsite and the remainder through distance learning facilities. The need to provide this space is based on the current lack of regional access to convenient higher education. The local population base for the existing CSU Northridge Off Campus Center (OCC) and future CSU Channel Islands consists of Ventura, western Los Angeles, and southeastern Santa Barbara counties. The 1996 Census population for Ventura and Santa Barbara counties exceeds one million and is projected to grow to approximately 1.3 million by 2005. Public and private elementary and secondary schools (K-12) enrolled 193,337 students in 1997 and enrollment is projected to increase to 205,569 by Year 2000. The two counties graduated 10,800 students from high school in 1990, and are projected to graduate 11,426 by 2000. This equates to a demand for about 3,000 FTES if only incoming first year students are considered. Almost 5,690 students from Ventura County attended CSU campuses in 1996/97. Of this total, 2,900 students went to CSUN, with 1,220 (637 FTES) upper division and graduate students attending the OCC. CSUN is projected to reach its enrollment ceiling of 25,000 FTES by the Year 2002. The second largest destination campus for Ventura County students (744) is at San Luis Obispo, which already exceeds its enrollment ceiling of 15,000 FTES. The proposed CSUCI would provide for these students within Ventura County, thereby alleviating other overcrowded CSU campuses, and the proposed project would also be attractive for students from all areas of California.

Because of the limitations on the availability of funding for the CSU system, the Trustees of the CSU have stated the objective that the proposed project site should provide a source of funding for development of the campus. To meet the financial needs of the proposed CSUCI, a reliable funding source associated with on-campus private business ventures and public-private partnerships is proposed. The following are the objectives for the ancillary development that would provide financial funding for the site.

- *To provide joint facilities for research;*
- *To provide employment opportunities for students;*
- *To provide an opportunity for student, staff, and faculty housing;*
- *To provide for development that has links to the University curriculum;*
- *To provide for development that is enhanced through its location adjacent to the University or that requires an essential location near the University; and*
- *To provide for the continued economic vitality of the region through productive development or reuse of those portions of the site which are consistent and compatible with the educational mission of the University.*

B.1.3 Project Description

The CSU has been in the process of establishing a new university campus within Ventura County for several years. In 1993, the CSU prepared and certified an EIR for the acquisition and development of a 260-acre agricultural parcel, which is presently owned by CSU, located west of the City of Camarillo and 7 miles northwest of the current subject site. In 1996, the University began to investigate the option of acquiring the California State Developmental Hospital when that facility was closed down in response to local interest. The CSU is proposing to adaptively reuse the former state hospital facilities for (a) initially relocating the Ventura Off-Campus Center (OCC) and (b) eventually developing a 15,000 full-time equivalent student (FTES) university campus. Reuse of these facilities allows the OCC to move out of inadequate leased office space in the City of Ventura and also re-directs the planning effort for the four-year university from the 260-acre agricultural parcel. Phased growth of the campus would be guided by a proposed Campus Master Plan. The Campus Master Plan will establish campus planning values and design guidelines, spatially locate the various elements of the campus and proposed uses, illustrate future development strategies, determine facility infrastructure needs, and determine capacity demands.

Currently the site contains approximately 1,600,000 total gross square feet (gsf) of developed structures. About 1,270,000 gsf are in the central area of the campus, with most of the remainder consisting of dormitories and a variety of attached and detached housing units (total approximately 400 units). The 634-acre site provides adequate area for the University and compatible university support uses. These uses at full build-out of the Campus Master Plan would include a variety of facilities related to the University and its academic programs. Proposed uses include a public elementary school, day-care center, academic enhancement center, research/office space (340,000 gsf) for academic partnership-oriented research and science and technology firms, food service and related university support space, and recreational facilities. Housing for faculty, staff, and students is currently being planned for, along with potential military family housing and senior facilities, which would range from units for retirement and independent living to full-time elder-care units. Student housing within the existing main campus buildings would serve up to 1,000 students at campus build-out, while 900 residential units would be developed within the project site. Adjacent to the residential units would be recreation/open space that would serve as a fuel modification zone and may be developed as a 9-hole golf course intended for use by the campus population.

Reuse of the hospital for the OCC is proposed to begin with 1,500 FTES as early as January 1999, with plans for expansion to 3,250 FTES in 3-8 years (2001/2002 to 2006/2007). This initial

phase of the Master Plan will involve the renovation of 12 buildings, yielding approximately 100,000 gsf and 170,000 gsf of space proposed for use by science and technology firms. As the student population increases and additional re-usable space becomes available through renovation, the campus would grow in accordance with the Campus Master Plan into a four-year university serving 15,000 FTES (11,750 FTES onsite) and approximately 1,500 faculty and staff. It is anticipated that full build-out would occur after Year 2025.

Legislation has been currently introduced to the State legislature that would allow the formation of a regulatory authority including the County of Ventura and the CSU that would assist in the future development of University-related facilities within the Campus Master Plan area. If the site is approved by the CSU for implementation of the University, the CSU and the County have agreed to develop a Specific Plan that would provide guidelines for the development of any facilities that are not in direct support of the University mission.

B.2 AREAS OF PUBLIC CONTROVERSY

The primary concern raised by the public regarding the reuse of the site by the University is the potential for growth inducing impacts because of the location of the site outside of the urban centers contained within Ventura County. Land use compatibility of the site with the adjacent approved development of Camarillo Regional Park is also an issue, especially with regard to noise effects due to the location of an amphitheater in the park and the development of senior housing within the site. Traffic has been raised as an important issue due to the project site's reliance on access via Lewis Road and the potential traffic conflicts during concert events at the adjacent Camarillo Regional Park.

Other concerns raised during the environmental scoping process for the EIR include: effects on rare plants and animals, loss of wetlands, impacts to historic structures and cultural resources, traffic at local intersections and Highway 101, consistency with Ventura County General Plan, effects to agricultural resources, flood control, fire hazard, water supply, wastewater treatment, solid waste generation, air quality, geologic issues, noise, and loss of landscaping trees planted in memoriam.

B.3 SUMMARY OF IMPACTS AND MITIGATION MEASURES

B.3.1 Environmental Effects

The following briefly categorizes the identified impacts for the various issue areas and the level of significance that remains with the imposition of recommended mitigation measures.

Unavoidable Adverse Impacts (U) are defined as significant, unavoidable adverse impacts which require a statement of overriding considerations to be issued per Section 15093 of the *State CEQA Guidelines* if the Campus Master Plan is approved. Based on the analysis contained herein, the following impacts have been determined to fall within this impact category.

Air Quality:	*Pollutant emissions due to increased vehicular travel to campus and inconsistency with AQMP*

Land Use:	*Conversion of up to 11.6 acres of prime farmland*
Noise:	*Project and cumulative increases in noise levels due to increased vehicular use*
Traffic:	*Project plus cumulative increases in traffic that create congestion at local intersections and along the freeway*

Significant but Mitigable Impacts (S) are significant adverse impacts that can be feasibly mitigated to less than significant levels and which require findings to be made under Section 15091 of the *State CEQA Guidelines*. The following impacts have been determined to be significant but mitigable given the measures identified herein.

Aesthetics:	*Alteration of public views from nearby roadways eligible for designation as scenic roads, alteration of aesthetic character of site, new sources of light and glare due to nighttime lighting*
Biology:	*Potential loss of wetland vegetation and possible degradation of sensitive coastal sage scrub vegetation, potential loss of raptor nests, potential loss of rare plants due to brush clearance activities*
Cultural Resources:	*Potential damage to unknown, buried resources during grading, demolition of buildings that contribute to historic character of site*
Geology & Soils:	*Strong ground-shaking at site during earthquakes, potential liquefaction because of high groundwater, debris erosion on hillsides near to buildings, foundation damage due to subsidence*
Hydrology:	*Location of parking garages in areas used for stormwater detention and location of garages in 100-year floodplain, increase in stormwater flows*
Water Quality:	*Increase in pollutants from urban uses, pesticide and fertilizer pollution from golf course*
Land Use:	*Construction caused compatibility problems of noise and dust emissions, potential inconsistency of residential uses and supporting commercial uses with County development policies*
Noise:	*Noise during construction, amplified music from offsite amphitheater affecting residences on campus*
Public Services:	*Increased solid waste generation*

Less Than Significant Impacts (L) are those effects that have been determined to not be significant because they do not exceed the thresholds for such a determination. The following issues have been determined to be less than significant.

Air Quality:	*Construction emissions and no creation of CO "hotspots"*
Biology	*No loss to listed sensitive species, minor loss of Catalina mariposa-lily stands, minor loss of plant and wildlife habitat in development area, minimal interruption of migration corridors*
Cultural Resources:	*No damage to known resources at Round Mountain*
Hydrology:	*Existing storm drains in campus core do not meet standards*
Land Use:	*Compatibility of proposed uses with adjacent agricultural uses*
Noise:	*Nuisance noise from nearby farm operations*
Public Services:	*Increased wastewater flows*

Beneficial Effects (B) are those effects of the project that are considered to be potentially beneficial to the local community.

Provision of additional higher educational facilities to meet the needs of the local populace with wide ranging cultural enhancement
Ultimate buildout of the master planned site will provide a beneficial impact on the aesthetics of the built environment of the academic core
Long term preservation of plant and wildlife habitat, including sensitive communities and plants, within the site
Long term preservation and enhancement of historical resources
Reuse of an existing major state asset
Expanded recreational and cultural facilities within the campus that serve the general public

B.3.2 Summary Table

Table B.3-1, which follows, includes a more detailed summary that describes the identified environmental impacts relative to each issue area, proposed mitigation measures, and residual impacts. The level of significance after mitigation are imposed is also shown in Table 2.3-1 by the appropriate abbreviation following the effect statement. Please note that different effects within any particular issue area can fall within a different impact category.

Table B.3-1. Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

AESTHETICS		
The aesthetic environment of the subject site is dominated by views of the Santa Monica Mountains and its foothills, into which the site is situated. Views to the west are dominated by the flat lands of the Oxnard Plain. Within the accessible viewshed, these lands are used for a variety of agricultural endeavors. The core campus area's aesthetic environment is highly unified visually, with 1930s-1940s era buildings formally arranged around courtyards and aligned to an axial grid system. Two other quadrants of buildings are developed in the East Campus area separated by hills and topography from the core campus. Implementation of the Campus Master Plan would result in a restoration of most of the structures in the campus core, potentially enhancing their aesthetic value. The addition of new structures at the campus perimeter would affect viewsheds primarily from Potrero Road. The east and northeast quadrants would be entirely modified visually, but these areas are not generally visible from outside the subject site or from the campus core. Measures guiding the design of new facilities would mitigate potentially adverse aesthetic effects to less than significant levels. Renovation of campus core buildings could enhance the aesthetic condition in this portion of the campus.		
Impact	**Mitigation Measures**	**Residual Impact**
AES-1 The proposed project has the potential to alter public viewsheds from Lewis Road and Potrero Road. **(S)**	**AES-1(a)** The University or Site Authority shall assess the health of the trees along Camarillo Drive from Lewis Road to Long Grade Canyon Creek. Missing or failing trees shall be replaced with an equivalent number of the same or otherwise suitable species (sycamore, oak, pepper). **AES-1(b)** Any widening of Camarillo Drive shall be done in a manner that incorporates the existing tree rows by adding lanes to the north side of the tree row along the inbound lane and converting the road to a divided road. A new tree row shall be planted at the outside edge of the new lanes.	Less than significant

Table B.3-1. Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measures	Residual Impact
	AES-1(c) Entry signage shall be designed in a monument-style format, and shall not exceed six feet in height. Lighting necessary for such signage shall be creatively shielded to direct light pools. **AES-1(d)** The Master Plan of lighting shall deal specifically with the treatment of the Camarillo Drive and the Santa Barbara Avenue extension, as well as any proposed nighttime lighting of play fields. Ultimate design shall consider leaving Camarillo Drive and the Santa Barbara Avenue extension unlit. If lighting is required by California State University lighting standards, it is recommended that bollard-style or splash lighting of street surface areas shall be employed. Under no circumstances shall lighting standards exceed 20 feet, and lighting shall not be permitted to exceed 1 foot-candle at a distance greater than 50 feet from the roadway perimeter. **AES-1(e)** If nighttime lighting of the recreational fields is required, lighting standards shall be of such a design as to not generate light pools in excess of 1 foot-candle at a distance of 100 feet from the field area. **AES-1(f)** If nighttime lighting of the recreational fields is required, tree row perimeter landscaping of the fields shall be incorporated into the design such that mature canopies would interrupt light pools from spilling offsite along the Potrero Road corridor. Evergreen species whose canopies are tall and broad shall be specified. **AES-1(g)** Buildings and facilities built along the Potrero Road edge of the core campus area shall be set back from the Potrero Road right-of-way a minimum of 40 feet. Heights of any building within 100 feet of the Potrero Road right-of-way shall be limited to 30 feet. **AES-1(h)** Highly reflective façade building materials such as glass or polished metals shall not be allowed to exceed 20 percent of the façade areas visible to Potrero Road travelers.	

CSUCI

Table B.3-1. Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measures	Residual Impact
	AES-1(i) Parking structure design shall incorporate buffering features (landscaping, half-walls on parking decks) to minimize glare and lighting from vehicles to viewers on Potrero Road. **AES-1(j)** The landscape plan for the Potrero Road parking structures shall specify that a minimum of 30% of the façade views shall be interrupted from Potrero Road viewing locations with landscaping. **AES-1(k)** Landscaping within the Potrero Road viewshed shall, when feasible, incorporate existing trees into the new design. When they must be removed, trees should be either relocated or replaced at a 1:1 ratio with tree species of a like variety to those being removed.	
AES-2 The aesthetic condition of the subject site would be altered through building demolition, construction of new buildings and roadways and landscaping during the life of the Master Plan. **(S)**	**AES-2(a)** All new structures shall be limited to four levels and 60 feet in parapet height. Building design plans shall incorporate design details as recommended by the campus master plan architect to minimize bulk and to ensure design compatibility with campus structures. Design features to be considered in the design of buildings and building complexes shall include: ♦ *Incorporation of courtyards and plazas;* ♦ *Perimeter landscaping along façades;* ♦ *Massing, rooflines, and facade materials that complement the core campus design;* ♦ *Setback of third and fourth stories; and* ♦ *Use of arcades, colonnades, and cupolas.* **AES-2(b)** Site lines of new structures in the core campus area shall orient to the grid pattern established by the existing design. Sight lines of visually prominent features such as the central cupola, Round Mountain, and surrounding ridgelines shall be considered in the design of new buildings. **AES-2(c)** All parking structures shall be limited to three levels and 30 feet in parapet height. **AES-2(d)** All mature trees with trunk measurements of 6" or greater when measured 4.5 feet above the ground shall be incorporated into site design when feasible. If their removal is	Less than significant.

Table B.3-1. Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measures	Residual Impact
	required for the construction of new structures, roadways, or parking areas, they shall be replaced at a one-for-one ratio with a like species or moved to a suitable location. Planting locations shall be determined by a qualified landscape architect in consultation with the building architect. **AES-2(e)** New roadways connecting the core campus area to Lewis Road and the northeast quadrant to Camarillo Drive shall be designed as two lane facilities, with four lane roads separated by a landscaped median. Lane widths shall be specified to the minimum of the standard to minimize the paved area. **AES-2(f)** New roadways connecting the core campus area to Lewis Road and the northeast quadrant to Camarillo Drive shall be landscaped with trees of a type and spacing pattern equivalent to that which exists along Camarillo Drive. **AES-2(g)** All surface parking areas shall include a minimum of 15% landscaped area, and shading shall cover a minimum of 35% of the surface area when trees are 10 years of age. Landscaping shall be compatible in design with the existing landscape treatment, as determined by the Master Plan landscape architect. In order to provide visual relief, glare reduction, and shade, large-canopy trees planted in an orchard siting arrangement are recommended. Pedestrian amenities shall be incorporated into the surface lot areas, including but not limited to textured paving at aisle crosswalks, walkways through parking aisles, bollard-style lighting, and seating areas. **AES-2(h)** Residential development in the east and northeast quadrants shall incorporate design principles accepted by the New Urbanism school, characterized by: ♦ *Narrow, traffic-calmed street design;* ♦ *Pedestrian and transit-friendly circulation system design;* ♦ *Mix of uses that accommodates basic needs on-site; and* ♦ *Human-scaled design.*	

Table B.3-1. Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measures	Residual Impact
AES-3 The proposed project would create new sources of light and glare through the construction of new buildings, lighting for sports facilities, and new parking areas. **(S)**	**AES-3(a)** Illumination of all parking areas should be accomplished in a manner that minimizes spillage of light canopies away from the lit area. Light standards shall be designed to achieve one (1) foot-candle at the property line, considering weather conditions. **AES-3(b)** Overhead lighting fixtures to light roads and parking areas shall not exceed 20 feet in height. **AES-3(c)** Top decks of parking structures shall be illuminated with floor-mounted bollards or half-wall mounted fixtures to provide splash lighting to the parking surface areas. Bollards shall not exceed six feet in height.	Less than significant.
AIR QUALITY		
Construction of the proposed project would result in soil disruption and subsequent dust emissions, as well as exhaust-related pollutants due to the operation of construction equipment. Although these effects would be considered less than significant due to their temporary nature, mitigation measures to be included within the CSU's standard construction contract are recommended that would further reduce air-borne dust and exhaust emissions. Operational emissions would exceed APCD thresholds for ROC and NOx. Recommended mitigation would partially reduce emissions; however, long-term impacts are considered significant and unavoidable. No significant impacts associated with potential CO "hotspots" are anticipated. The projected on-site population exceeds the AQMP population projections for the area, but less than the on-site population of the former hospital use. Nonetheless, growth associated with the project is considered to be inconsistent with the AQMP and therefore cumulatively significant and unavoidable.		
Impact	**Mitigation Measures**	**Residual Impact**
AQ-1 Project construction would result in temporary increases in air pollutant emissions. **(L)**	The CSU includes standard construction mitigation measures in all of their construction contracts. The following Ventura County APCD recommended measures should be included within these construction contracts. **AQ-1(a) Dust Control Measures:** Dust generation produced during grading and construction activities shall be controlled by the following activities: • Throughout grading and construction operations, fugitive dust shall be controlled with the use of water trucks generally at least three times per day (except immediately after rainfall). If available, reclaimed water from Camrosa Water District shall be used. • All exposed soil areas, including unpaved on-site roadways and material stock piles shall	Because construction emissions would be temporary, this impact is considered less than significant.

Table B.3-1. Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measures	Residual Impact
	be watered and/or treated with APCD approved Soil Stabilization materials and roll compacted unless recent rainfall provides sufficient dust control. Completed grading shall be monitored weekly for dust stabilization. • All trucks exporting fill from the site shall use tarpaulins to cover the load in compliance with State Vehicle Code Section 23114. Material transported on-site shall be sufficiently watered or secured to prevent fugitive dust. • All construction traffic on-site along dirt roads shall be limited to 15 miles per hour or less. • APCD-approved soil stabilizers, such as water and roll compaction, Magnesium Chloride additives (DUST-OFF or DTC or equivalent) shall be applied to portions of the construction site that are inactive for over four days. • During periods of high winds (i.e., wind speed exceeding 20 mph averaged over one hour), all clearing, grading, earth moving, and excavation operations shall be curtailed to the degree necessary to prevent fugitive dust from the project site from becoming a nuisance or hazard. The Site Superintendent shall use his/her discretion in conjunction with the Ventura County APCD in determining when winds exceed 20 mph averaged over one hour. • Streets shall be swept at the end of each day during construction if visible soil material is carried over to adjacent roads. • Employees involved in grading operations shall be advised to wear face masks during dry periods to reduce inhalation of dust. **AQ-1(b) Ozone Precursor Control Measures:** • Equipment engines should be maintained in good condition and in proper tune as per manufacturer's specifications; • Lengthen construction periods during the smog season so as to minimize the number of vehicles and equipment operating simultaneously; and • Use new technologies to control ozone precursor emissions as they become available.	

Table B.3-1. Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measures	Residual Impact
AQ-2 Operational emissions would exceed APCD significance thresholds for ROG and NO_x. **(U)**	**AQ-2(a)** The university shall implement a Trip Reduction Program that would include campus van and car pools. All on-site vans or buses shall be electric powered or shall run on clean fuels. The Trip Reduction Program shall be evaluated annually by University transportation officials and modified as necessary to achieve reasonably feasible trip reduction benefits. The Trip Reduction Program shall be initially designed considering the following optional strategies: Ridesharing ◆ *Carpool/vanpool match* ◆ *preferential parking for carpools and vanpools* ◆ *financial subsidies or rewards to carpool/vanpool/buspool passengers including drivers ** ◆ *employer-sponsored vanpools ** ◆ *carpool/vanpool/buspool operating subsidies, e.g. insurance, fuel, maintenance, etc. ** Transit ◆ *subsidized bus passes for students ** ◆ *work site ticket sales* ◆ *financial subsidies/rewards to transit users, e.g. Commuter Check™ ** ◆ *transit route maps and schedules on-site* ◆ *shuttle transit line (employer-sponsored or subsidized) ** ◆ *work with VCTC to extend VISTA bus service onto campus* Trip Elimination ◆ *distance learning/satellite education centers* ◆ *consolidated/coordinated scheduling of classes* Parking Management ◆ *reduced parking rates for carpools and vanpools only* ◆ *preferential parking for clean fuel vehicles* ◆ *campus parking pricing scheme to reduce vehicle trips where consistent with CSU fee policies*	Project-related emissions would remain above APCD significance thresholds and impacts to regional air quality are considered significant and unavoidable.

Table B.3-1. Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measures	Residual Impact
	Bicycle and Pedestrian ♦ *financial subsidies to bicycle or pedestrian commuters including purchase of equipment for commute trip purposes* * ♦ *bicycle lockers or other secure, weather-protected bicycle parking facilities* ♦ *bicycle and/or walking route information* ♦ *on-site bicycle registration* ♦ *employee shower facilities and clothes lockers* ♦ *financial subsidies/rewards for walking and other non-motorized transportation modes* * ♦ *active participation and promotion of "Bike to Work Week"* On-Site Facilities/Services ♦ *site planning that would encourage walking, transit, carpool, vanpool and bicycle use* ♦ *restrict vehicle access within the campus perimeter* ♦ *on-site services to reduce mid-day vehicle trips, e.g. cafeteria, ATMs, apparel cleaning, etc.* ♦ *permit access to the proposed onsite child daycare center for University staff, students, and employees of the research office uses* ♦ *refueling/recharging facilities for clean fuel vehicles used for employee/student commute trips, e.g. electric, compressed natural gas vehicles* ♦ *on-campus housing preference to students that do not require parking accommodations* Promotional and Marketing Activities ♦ *ridesharing marketing campaigns* ♦ *on-site transportation fair to promote commute alternatives* ♦ *participation in "California Rideshare Week"* Other ♦ *class scheduling during non-peak hours* ♦ *membership in a Transportation Management Association that provides services and incentives* * ♦ *establishment of employee committee to help design, develop, and monitor the trip reduction program*	

Table B.3-1. Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measures	Residual Impact
	♦ *enhanced trip reduction efforts on forecast criteria pollutant exceedance days* ♦ *financial subsidies/rewards for clean vehicles used for employee commute trips including carpool and vanpool vehicles ** ♦ *assistance to employees in locating their home residence closer to the work site and/or along transit routes* ♦ *trip reduction measures to reduce non-employee vehicle trips to the work site, e.g. busing for student populations, delivery trips, etc.* ** The financial feasibility of these optional strategies are reliant on funding that would be dependent upon availability and allocation of parking citation revenue available to CSUCI for alternative transportation.* **AQ-2(b)** The university shall reduce NOx and ROG emissions produced by project related trips by subsidizing bus passes for students and employees at the site. **AQ-2(c)** Structures shall be oriented to facilitate the use of passive solar energy. **AQ-2(d)** The U.S. Department of Energy is currently leading an effort to place one million solar energy systems on the roofs of buildings and homes across the United States by the year 2010. The California State University should investigate federal grants and other programs that will be used to initiate sales of solar energy systems for applicability to site facilities. **AQ-2(e)** On-site landscaping shall be designed so as to provide natural cooling and minimize the costs associated with upkeep by reducing the need for maintenance and reducing the need for motorized lawn care equipment. **AQ-2(f)** All new structures on-site shall be designed to exceed California Code of Regulations, Title 24 energy standards by at least 20%.	

Table B.3-1. Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measures	Residual Impact
	AQ-2(g) The university shall convert onsite maintenance vehicles to electric power or clean fuels (such as compressed natural gas). Golf carts if used at the golf course shall all be electric powered.	
AQ-3 Carbon monoxide concentrations associated with cumulative traffic growth would not exceed state or federal standards. **(L)**	None necessary.	No significant residual impacts.
AQ-4 The proposed project could be considered inconsistent with the County's Air Quality Management Plan.	Measures recommended under Impact AQ-2 would reduce air quality effects to the degree feasible.	Impacts are considered cumulatively significant and unavoidable.
BIOLOGICAL RESOURCES		
The project site is vegetated primarily by Venturan coastal sage scrub on the hillsides, with the previously disturbed lowlands vegetated as urban landscaping, ruderal field vegetation, or non-native grassland. The threatened Verity's dudleya and rare Conejo buckwheat are located onsite within the coastal sage scrub habitat, and several other sensitive plants are also expected to be found within this vegetation type. This plant community also provides suitable habitat for several wildlife species that have declining populations, with the coastal cactus wren, coastal western whiptail, ashy rufous-crowned sparrow, and San Diego desert woodrat known to be located within this habitat at the site. The proposed Campus Master Plan is designed for growth to occur within the previously disturbed lowland areas, thereby preserving the coastal sage scrub in open space. However, about 4.0 acres of sensitive wetland communities (southern willow scrub and mulefat scrub) could potentially be altered due to the planned residential and recreation/open space development. This is considered a significant project and cumulative impact. An additional 5 acres of wetland plants located within a mowed and disced field could also be removed during Phase 3 construction of a parking garage. No significant impacts to listed sensitive plant species are expected, but adverse impacts would occur to a population of Catalina mariposa lilies. Impacts to sensitive wildlife species would be less than significant except for the potential removal of trees that may contain nesting raptors. This effect would be mitigated by determining that nesting is not present if and when large trees are proposed for removal and through construction controls if raptor nesting is determined. Future growth of the campus as planned by the Campus Master Plan would not result in significant effects to regional wildlife movement patterns because of the maintenance of large portions of the site in open space and the presence of similar habitats within non-growth areas of the Santa Monica Mountains to the east. Certain buildings at the site are exposed to wildfire hazard associated with sensitive coastal sage scrub vegetation; maintenance of both fire safety and this vegetation can be achieved through landscaping controls and installation of external automatic sprinklers.		
Impact	**Mitigation Measures**	**Residual Impact**
BIO-1 Buildout of the proposed Campus Master Plan would reduce the amount of plant and wildlife habitat available at the site. Substantial decreases in locally and regionally significant biologically sensitive	**BIO-1(a)** The open space portions of the Campus Master Plan shall be managed by the University ~~as a biological preserve~~ to maintain its biological resources, and Round Mountain shall also be managed as a cultural resource. Prior to any construction, vegetation clearing, or other change in the natural characteristics of	Assuming successful wetland mitigation, the residual effects of campus buildout on general plant communities and

Table B.3-1. Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measures	Residual Impact
communities would also occur. **(S)**	this area, the University shall consult with the Biology Department regarding the biological consequences and <u>any recommended procedures.</u> ~~delineate all feasible mitigation measures to control any potential impacts~~. **BIO-1(b)** Wetland habitats lost as a result of the construction of the north residential access road or the conversion of the debris basin shall be replaced through the establishment of new wetland within the detention basins that would be needed for the site. **<u>BIO-1(c)</u>** <u>The CSU shall post signs prohibiting indiscriminate access into the surrounding hillsides. Such signage shall be included with those marking the location of designated trails. Warning signs regarding the presence of rattlesnakes shall similarly be posted.</u> **<u>BIO-1(d)</u>** <u>The CSU shall prepare a landscaping plan for the open space buffers between the developed portions of the site and native open space vegetation. This landscaping plan shall contain a palette that is appropriate to ensure compatibility between the landscaped areas and the native plants while maintaining the historical landscaping palette present within the developed portions of the site. Those plants known to be invasive species shall be excluded from the landscaping palette.</u>	wildlife habitat is expected to be less than significant.
BIO-2 Buildout of the proposed Campus Master Plan may cause a decrease in the population size of sensitive plant species known to occur at the site. **(L)**	None Necessary. Recommendation that either the recreation/ open space be designed so as to avoid removing stands of Catalina mariposa lily or that the bulbs be relocated after becoming dormant to a suitable location(s) within the open space area.	Less than significant.
BIO-3 Build-out of the Campus Master Plan may affect sensitive fish and wildlife resources at the site. **(S)**	**BIO-3** Removal of potential raptor nest trees should be limited to the time period between September 1 to January 31. Alternatively, prior to any trees being removed during the raptor nesting season, a survey for active nests shall be conducted by a qualified biologist at the site two weeks prior to any scheduled tree removal. If active nests are located, then all construction work must be conducted at least 500 feet from.	Less than significant.

Table B.3-1. Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measures	Residual Impact
	the nest until the young have fledged and are independent of the adults	
BIO-4 Development of the project could cause an indirect and cumulative impact to regional fish and wildlife resources because of the interruption of wildlife corridors or habitat linkages. **(L)**	No mitigation measures are necessary.	Impacts to the movement of wildlife are not significant.
BIO-5 Development within the project site is located adjacent to native vegetation that has a high potential for wildfire. Fuel modification zones and wildfire suppression efforts can alter the diversity of the vegetation in the long term. **(S)**	**BIO-5** Those buildings located within 100-feet of undisturbed coastal sage scrub shall have automatic fire sprinklers installed under the eaves facing the brush and shall be landscaped such that no shrubs or trees occur under the eaves or within 10 feet. No landscaping conifer, eucalyptus, cypress, juniper, acacia, or palm trees may be located on the building side exposed to natural brush.	Implementation of this mitigation measure would maintain fire safety while not removing sensitive vegetation
CULTURAL RESOURCES		
The Campus Master Plan area includes an important archaeological resource associated with Round Mountain, and the former Camarillo State Hospital, which may be eligible for listing to the National Register of Historic Places and is an excellent example of Mission-Spanish Colonial Revival architectural style. The hospital also has historic value as a significant manifestation of public health care policy during the Great Depression and post-Depression era of the 1930s and 1940s. The Campus Master Plan has been designed to avoid affects to the known archaeological resources and to adaptively reuse most of the former hospital buildings. However, proposed demolition of certain structures, primarily the Spanish Colonial Revival style employee housing and the former laundry building, could cause significant effects on the historical fabric of the campus as a whole. While the proposed project would preserve the majority of buildings within the site, it is recommended that the laundry also be preserved through adaptive reuse and that other historic buildings be documented in detail prior to their demolition. On a more speculative basis, the project may also result in damage to unknown, buried cultural resources that may be located in the area. This impact can be mitigated through notification and monitoring procedures.		
Impact	**Mitigation Measures**	**Residual Impact**
C-1 Project construction could expose previously unknown, buried cultural resources within the Campus Master Plan area and along future road expansions. **(S)**	**C-1** Should unanticipated cultural resource remains be encountered during construction or land modification activities, work must stop, and the University shall contact an archaeologist to provide a qualified assessment of the nature, extent and possible significance of any cultural remains. <u>If significant resources are encountered or inadvertently damaged, the University shall implement the recommendations of the archaeologist with respect to documenting and safeguarding the resource, and restoring or repairing any damaged artifacts or resources</u>.	Reduction of the potential effects of construction impacts to as minimal level as feasible.

Table B.3-1. Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measures	Residual Impact
C-2 Growth and activities within the Campus Master Plan area may affect the known cultural resources at Round Mountain. **(L)**	No mitigation measures are required.	No significant impacts anticipated.
C-3 Development within the project site would demolish some structures and may otherwise alter the historical relationships and physical characteristics of historic resources associated with the Camarillo State Developmental Hospital. **(S)**	**C-3(a)** The University shall adaptively reuse the laundry facility as part of the West Campus, if feasible. If not feasible, historic documentation of this resource shall be done. **C-3(b)** Employee Housing Home 1 should be considered for reuse, possibly as part of a community center or ~~possibly~~ the academic enhancement center. For this structure and the other Spanish Colonial Revival styled employee housing buildings, the University shall prepare a detailed report regarding the structures that includes: photographic documentation; detailed architectural drawings if they do not already exist; additional historical research into early photographs; and aspects of construction. **C-3(c)** The CSU will continue to consult with the State Historic Preservation Officer for individual adaptive reuse building rehabilitation projects.	With incorporation of the mitigation measures, the historic resources of the former Camarillo State Hospital would be documented for future historians. In addition, the adaptive reuse of the majority of the historic buildings within the site would be considered a potentially beneficial effect of the proposed project.
GEOLOGY AND SOILS		
The developable portions of the Campus Master Plan are generally alluvial filled valleys with shallow groundwater in certain locations. Significant but mitigable impacts related to geologic and soil conditions have been identified at this site. Future median seismic ground accelerations up to 0.53g along the Bailey fault, seismically induced liquefaction of soil, and soil hazards (debris flows and rock falls) have been identified as potentially significant impacts. Mitigation measures recommended are designed to be pre-emptive, and incorporate standard requirements for new construction.		
Impact	**Mitigation Measures**	**Residual Impact**
GEO-1 Future seismic events could produce median ground accelerations up to about 0.53 g on the site. **(S)**	**GEO-1(a)** Building-specific seismic studies shall be required for new University structures. These studies will determine the applicable standards to be implemented per CSU standards. Mitigation measures identified within these site specific studies shall be implemented for new construction. **GEO-1(b)** Seismic design for proposed buildings of four stories or more in height, or 6,000 square feet or more in ground level floor space, shall be reviewed by a licensed structural engineer.	Impacts related to ground shaking are reduced to the extent of applicable industry standards.

Table B.3-1. Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measures	Residual Impact
	GEO-1(c) Those buildings or structures requiring a permit from the County shall be designed to meet County criteria and be inspected by County building inspectors.	
GEO-2 Future seismic events could result in liquefaction of soils beneath the site. **(S)**	**GEO-2** A geotechnical study shall be prepared for those areas proposed for new structural development. This report shall include an analysis of the liquefaction potential of the underlying materials. If the site is confirmed to be in an area prone to seismically-induced liquefaction, suitable measures shall be proscribed and implemented.	Impacts are reduced to the extent of applicable industry standards.
GEO-3 Soil stability conditions contributing to landslides, debris flows, or rock falls exist within the Campus Master Plan area. **(S)**	**GEO-3** A geotechnical evaluation shall be prepared to assess the stability of slopes adjacent to new structures proposed in the area of the former powerhouse when Phase 3 expansion is planned. This evaluation shall determine the potential for adverse soil stability and discuss appropriate mitigation techniques, primarily setting structures back sufficiently from the slope to avoid problems.	If slope stability problems exist, several solutions are possible to eliminate hazards. These solutions will need to retain the slopes in their natural condition to avoid secondary biological impacts. Setbacks and adequate drainage are the primary solutions that should be employed.
GEO-4 Soil conditions leading to subsidence could result from the removal of underlying support (oil, gas, or water) or during strong ground shaking. **(S)**	**GEO-4(a)** A geotechnical evaluation shall be required prior to site development. This report shall address the potential for static and seismically-induced soil subsidence. All recommended mitigation measures necessary to reduce this impact shall be implemented. **GEO-4(b)** If a structure is identified to be in a high soil subsidence zone as a result of the geotechnical report, foundations shall be designed by a structural engineer to withstand the existing conditions, or the site shall be graded in such a manner as to mitigate the potential impact.	Impacts related to soil subsidence would be reduced to a less than significant level.
HYDROLOGY AND WATER QUALITY		
The developed portions of the campus site currently have a storm drainage system that adequately serves the campus though it does not meet current design standards. Development of the proposed residential area east of the campus core will require the construction of an appropriately designed		

Table B.3-1. Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

drainage system. This drainage system will need to provide for storm water detention within the site to avoid increased flooding impacts on downstream properties. The parking garages proposed west of the campus during Phase 3 development are within areas that currently receive discharge of stormwater flows from the campus core. New retention or detention facilities will be required to avoid flooding impacts both within the campus and on adjoining lands. Similar to other development, construction of new urban uses will potentially increase the amount of urban-related contaminants exported from the site during construction and long term occupation of the site. A Best Management Practices and Stormwater Pollution Prevention plan are needed to reduce the potential for downstream impacts. The potential for a 9-hole golf course to be developed in the recreation/open space introduces the potential for contamination of downstream water by fertilizers and pesticides associated with the management of the golf course. The development of a Best Management Practices and Integrated Pest Management plan(s) would reduce the potential for downstream water quality impacts. Surface and groundwater monitoring is recommended to determine compliance and the effectiveness of the mitigation measures.		
Impact	**Mitigation Measures**	**Residual Impact**
HYD-1 Capacity of the drainage system within the campus core is exceeded during the 10-year frequency storm event. **(L)**	The following improvements would eventually be needed as part of long term maintenance: **HYD-1(a)** Replacement of 2,000 feet of the existing 8 inch to 18 inch collector line in Ventura Street adjacent to the Maintenance Shops. **HYD-1(b)** Replacement of approximately 2,000 feet of the existing 18-24 inch collector line Camarillo Drive. **HYD-1(c)** Replacement of 1,000 feet of the existing 24 inch outfall line which flows westerly to the open field north of the cogeneration facility.	No significant residual effects associated with flooding within the campus core.
HYD-2 The parking garages developed during Phase 3 of campus growth are located in areas that are used for storm water detention and may be subject to the 100-year flood. **(S)**	**HYD-2(a)** A hydrology study shall be prepared for the proposed parking garage on the northwest end of the campus core. Drainage design for the 9-acre parking structure shall re-route storm flows such that local peak flows are not increased and no additional flooding is created by the new drainage system. This may include delivery of flood flows into the Calleguas Creek system prior to the peak event, or the routing of storm flows into a suitably sized detention or retention basin. **HYD-2(b)** A hydrology study shall be prepared for the two southern parking garages as part of the drainage design. Such design shall include provisions for on-site retention if necessary to avoid offsite flooding problems along Potrero Road.	After implementation of properly designed drainage systems, no significant residual impacts would be anticipated.

Table B.3-1. Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measures	Residual Impact
HYD-3 Expansion of residential uses in the East Campus would result in storm water flows that exceed the existing drainage system capacity. **(S)**	**HYD-3(a)** Design and construct one or more detention basins within the residential and recreation/open space zones to reduce the post-development peak discharge to pre-development discharge rates. **HYD-3(b)** If the golf course design converts the existing debris basin, an appropriately sized debris basin shall be located within other portions of the golf course along the main Long Grade Canyon channel. **HYD-3(c)** Additional connections of drainage systems to the Long Grade Canyon channel within the site will require the preparation of a hydrology study to be submitted to the Ventura County Flood Control District.	After implementation of properly designed drainage systems, no significant residual impacts would be anticipated.
HYD-4 The Campus Master Plan could result in the runoff of various pollutants that would cumulatively effect local drainages and subsurface aquifers. **(S)**	**HYD-4(a)** The University shall require the contractor for each new facility subject to NPDES requirements to prepare a SWPPP containing specific Best Management Practices to be instituted during site construction. **HYD-4(b)** Construct oil and grease traps within catch basins for the parking lots and/or construct perimeter infiltration trenches. The catch basin shall include a trap that prevents floatables from discharging with the drainage water. **HYD-4(c)** The University shall limit the use of pesticides and inorganic fertilizers applied to the landscaping to those quantities necessary to treat specific problems.	Less than significant.
HYD-5 Decrease in the quality of surface water and groundwater associated with change in land use to golf course. **(S)**	**HYD-5(a)** A Best Management Practices Plan and Integrated Pest Management Plan shall be prepared for implementation by the golf course operator. The purpose of both plans would be to reduce the use of harmful chemicals onsite, and to reduce the potential offsite movement of high concentrations of sediment, salts, excessive nutrients, and chemicals. **HYD-5(b)** The golf course shall be designed to include drainage swales and detention basins to collect and filter pollutants.	Assuming effective implementation of these measures, water quality impacts associated with a potential golf course at the site would be reduced to a less than significant level.

Table B.3-1. Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measures	Residual Impact
	HYD-5(c) A groundwater monitoring well shall be installed by the golf course operator at the point where golf course drainage flows to receiving channels. The wells must meet the minimum requirements of Bulletin 74-90 (California Well Standards) and the Ventura County code. The wells shall be sampled by the operator on a quarterly basis for a minimum of three years, and then semi-annually for at least an additional seven years for a total of 10 years, with the sampling reports sent to the CSUCI ~~CSU Risk Management Authority~~ and the Regional Water Quality Control Board. At the end of ten years, the data shall be analyzed to determine if there is a need to continue the monitoring. Constituents sampled for will include nitrate, phosphate and any pesticides applied to the golf courses. An initial well sample shall be taken at completion of grading, but before the installation of landscape vegetation. **HYD-5(d)** Surface water samples shall be taken within all drainages immediately downstream of golf course facilities at periods to be determined by the Best Management Practices Plan, but not more than quarterly. The samples shall be examined for nitrate and phosphate content, and any pesticides applied to the golf courses. Sampling reports shall be sent by the operator to the CSUCI ~~CSU Risk Management Authority~~ and the Regional Water Quality Control Board.	
LAND USE AND PLANNING		
The proposed project would create the potential for land use compatibility conflicts, both during construction and during the long-term operation of the project. Construction-related conflicts involve the creation of dust and noise that could affect on-site operations. Long-term conflicts could occur between the proposed University and adjacent agricultural uses and the proposed amphitheater. However, with recommended mitigation measures and implementation of appropriate site planning and buffering techniques, both temporary and long-term conflicts can be reduced to a less than significant level. The project access roads would involve the direct conversion of up to 11.6 acres of farmland, which is considered a potentially significant and unavoidable impact of the project. The ancillary uses that are not directly part of the University mission may be considered inconsistent with policies of the Ventura County General Plan and the Guidelines for Orderly Development, both of which encourage urban development to occur within incorporated cities or other existing communities. However, these inconsistencies would be addressed with the adoption of a Specific Plan and accompanying General Plan Amendments by the County of Ventura which would acknowledge the special status of the campus.		

Table B.3-1. Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measures	Residual Impact
LU-1 Project construction may create both internal and external compatibility conflicts in the short-term. **(S)**	See mitigation measures for Air Quality and Noise.	Less than significant.
LU-2 Long-term operation of the project may create compatibility conflicts with adjacent agricultural uses. **(L)**	None required.	Less than significant.
LU-3 The amphitheater proposed at the adjacent regional park site may create long-term conflicts with on-site residential uses. **(L)**	**LU-3** The University shall require that the developer of the residential units in the northern end of the East Campus include a disclosure notice in the lease/purchase agreements regarding the potential for nuisance noise problems associated with the amphitheater.	Less than significant, but nuisance effects may still be anticipated.
LU-4 Aircraft fly-overs may create long-term conflicts with on-site residential uses. **(L)**	No mitigation measures are necessary.	Less than significant.
LU-5 Project implementation could directly convert up to an estimated 11.6 acres of prime farmland. **(U)**	**LU-5** Whenever feasible, Camarillo Drive and the Santa Barbara extension for the University site shall be aligned so as to avoid adjacent farmland.	Unavoidable loss of farmland with implementation of the project as proposed.
LU-6 Some proposed uses within the Master Plan may be considered inconsistent with various County General Plan policies and zoning.	Adoption of a Specific Plan by the County and a General Plan Amendment would reconcile the discrepancies between the proposed project and the County's General Plan.	
LU-7 Some land use components of the project could be considered inconsistent with the County's Guidelines for Orderly Development.	Adoption of a Specific Plan by the County and a General Plan Amendment would reconcile the discrepancies between the proposed project and the County's Guidelines for Orderly Development.	
NOISE		
Demolition and construction activity associated with the project would generate high noise levels that would be potentially disruptive to university operations, the planned elementary school, and on-site residences. However, because noise generated by construction would be temporary and would not affect sensitive off-site receptors, it is considered less than significant. An amphitheater has been approved for development to the northeast of existing and proposed on-site residences. Average and peak noise levels generated by concerts are expected to exceed threshold criteria at residences located in the north portion of the East Campus. Additional sound insulation of residences, prior notification, and requested improvements to the County's Noise Abatement Plan for the amphitheater would reduce effects to an acceptable level. Traffic generated by the university would affect sensitive residential noise receptors along Lewis Road, Cawelti Road, and Los Posas Road. Traffic noise impacts could be minimized through the use of van and car pools, although traffic noise impacts would remain significant and unavoidable. Adjacent farming activities may create occasional nuisance noise in the core campus area, although such impacts are not considered significant.		

Table B.3-1. Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measures	Residual Impact
N-1 Demolition of existing facilities and construction of new facilities on the campus could cause temporarily high noise levels. **(S)**	**N-1(a)** Grading activities that involve heavy equipment should be scheduled for during the summer months when there is reduced activity on the campus or at other times when there is less activity on the campus. **N-1(b)** Construction activity within the campus core, including at the parking garages, shall be limited to day time hours of 7:00 AM to 6:00 PM Monday through Friday, and no construction on State recognized holidays. **N-1(c)** Air compressors and generators used for construction within the campus core shall be surrounded by temporary acoustical shelters if within 300 feet of a sensitive receptor.	Occasionally high nuisance noise levels during construction periods.
N-2 The proposed Camarillo Regional Park amphitheater would generate sound levels during concerts that would cause nuisance noise impacts to existing and proposed residential units in the East Campus. **(S)**	**N-2(a)** The University shall not ~~approve~~ accept the Noise Abatement Plan for the amphitheater operations until the following are included: ♦ *Curfew for performances of 10:00 pm,* ♦ *Established limits for "maximum" or "peak noise levels,"* ♦ *Enforceable monetary penalties for non-compliance with standards, and* ♦ *Development of a permanent sound system with sound limiting equipment.* **N-2(b)** Residences within the northern portion of the on-site residential zone shall include the following: ♦ *Air conditioning or a mechanical ventilation system that will allow doors and windows to remain closed* ♦ *Double-paned glass on all windows* ♦ *Windows and sliding glass doors mounted in low air infiltration rate frames (0.5 cfm or less)* ♦ *Solid core exterior doors with perimeter weather stripping and threshold seals* ♦ *Building wall construction capable of attenuating exterior noise by 25 dBA Ldn.*	Noise levels would be at an acceptable level for residential use, however exterior noise levels associated with the amphitheater may still result in complaints by future onsite residences.
N-3 Project traffic would generate noise levels that could affect sensitive receptors along Lewis Road and Cawelti Road. **(U)**	**N-3** Rubberized asphalt paving material should be used for any repaving of roads affected by project and cumulative traffic.	Measures would reduce noise levels, but noise levels could not be reduced to below County standards at all locations.

Table B.3-1. Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measures	Residual Impact
N-4 Adjacent farming activity may generate noise that creates an occasional nuisance for on-site uses. **(L)**	None necessary.	Less than significant.
PUBLIC SERVICES		
This section discusses those environmental effects to public services that potentially have a significant impact on the physical environment, wastewater collection and solid waste disposal services. Public service issues that would not have a significant environmental effect are discussed in Section 5.11, Effects Found to be less than Significant, and in the Initial Study (Appendix A). Storm drainage issues are discussed in Section 5.6, Hydrology and Water Quality, of this EIR. It is also noted that the project itself is a major public service that provides higher education facilities, which is a beneficial effect. *The Camrosa Water District provides wastewater treatment services to the project site. Increased sewage flows would occur with full buildout of the University. The treatment plant, with planned expansion, would have enough capacity to meet the University wastewater treatment demands at full buildout of the campus. Therefore, the impact of the proposed project on wastewater treatment facilities would be less than significant.* *Proposed buildout of the CSUCI campus would generate 1,274 tons per year of solid waste assuming no recycling occurs. Recommended mitigation measures to implement campus recycling and source reduction programs would reduce solid waste generation by 50%, thereby reducing impacts to less than significant levels.*		
Impact	**Mitigation Measures**	**Residual Impact**
PS-1 Proposed buildout of the Campus Master Plan would increase sewage flows. **(L)**	None necessary.	None.
PS-2 Proposed buildout of the CSUCI campus would generate additional solid waste. **(S)**	**PS-2(a)** A long-term plan for recycling ~~should~~ shall be developed with specific collection goals for each recyclable material category and a method to track quantities of materials. A source reduction plan should include such policies as training custodial staff for recycling as part of their jobs. **PS-2(b)** A source reduction plan ~~should~~ shall be developed and integrated with a long-term recycling plan. A source reduction plan should include measures to eliminate single use items, encourage reuse of materials, use of more durable materials, and eliminate unnecessary usage. Use of reusable mugs and drink discounts have been shown to reduce the solid waste stream significantly (by as much as 30% at University of Colorado). **PS-2(c)** The University ~~should~~ shall promote the use of materials with recycled material content in them such as paper products.	Effects associated with an increase in solid waste generation would be less than significant with the use of recycling and implementation of a source reduction program.

Table B.3-1. Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measures	Residual Impact
	Disposable products that are used should be made of materials that can be easily collected on campus and recycled. For example, the plastics that are marked with numbers "1" or "2" are more readily recyclable than those plastic products marked with higher numbers. **PS-2(d)** As part of the construction and demolition contracts, the University shall require that contractors purchase and utilize materials with a recycle content during the construction of University facilities. **PS-2(e)** The University ~~should~~ shall prepare and implement an organics recycling plan which would identify methods of recycling or reducing green waste collected from the project site through mulching or small-scale composting activities. Space allocation for on-site mulching and composting activities should be provided at the facilities maintenance yard. Any composting shall meet recent new standards concerning the control of pathogens.	

TRANSPORTATION / TRAFFIC

Traffic impacts associated with the proposed project were analyzed assuming development in two components. Phase 1 of the project assumes an enrollment of 3,250 FTES and additional non-university developments. The Phase 2 and 3 scenario assumes an enrollment of 11,750 FTES and full development of the other non-university uses. Phase 1 would generate 14,484 average daily trips, 1,327 trips during the A.M. and 1,343 P.M. peak hour periods. The incremental change in traffic created by Phase 1 compared to the previous hospital use of the campus is 5,178 ADT, 769 A.M. and 821 P.M. peak hour trips. Development of Phase 1 would impact the operation of several existing two-lane roadway segments in the study area, as well as 7 study-area intersections. Phase 2 and 3 buildout of the proposed project would generate 36,535 average daily trips, 3,438 A.M. and 3,321 P.M. peak hour trips. The incremental change in traffic created by buildout of the university compared to the previous hospital use of the campus is 27,229 ADT, 2,880 A.M. and 2,799 P.M. peak hour trips. Full buildout of the campus would contribute to cumulative traffic impacts at several area roadways and intersections (6 roadway segments and 6 intersections.

Impact	Mitigation Measures	Residual Impact
T-1 Development of Phase 1 of the Campus Master Plan would result in the addition of 14,484 ADT to the roadways adjacent to the site, which would impact the operation of several existing two-lane segments. This represents a net increase of 5,178 trips over the traffic that	**T-1(a) Lewis Road.** Traffic volumes on the section of Lewis Road between Cawelti Road and Camarillo Drive would increase to 18,900 with buildout of Phase 1. This increase in traffic would require implementation of a 4-lane roadway section on Lewis Road between Cawelti Road and Camarillo Drive. <u>The section of Lewis Road north of Cawelti Road would carry 15,200 ADT with buildout of Phase 1. This</u>	Road widenings would result in secondary impacts to agricultural land, air quality, and noise. Impacts to agricultural land would be

Table B.3-1. Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measures	Residual Impact
would be generated by the existing State Hospital facility. **(U)**	Increase in traffic will require improvements to the existing 2-lane roadway to provide adequate shoulder areas and standard lane widths as required by the County of Ventura. **T-1(b) Camarillo Drive**. Traffic volumes would increase to approximately 14,500 ADT on Camarillo Drive with Phase 1 traffic. This increase in traffic would require signalization of the Lewis Road/Camarillo Drive intersection and implementation of left- and/or right-turn lanes on all intersection approaches. **T-1(c) Cawelti Road**. Traffic volumes would increase to 7,400 ADT on Cawelti Road with buildout of Phase 1 of the project. This increase in traffic would require signalization of the Lewis Road/Cawelti Road and Las Posas Road/Cawelti Road intersections and implementation of left- and/or right-turn lanes on all intersection approaches. This increase in traffic will also require improvements to the existing 2-lane roadway to provide adequate shoulder areas and standard lane widths, as required by the County of Ventura.	significant and unavoidable.
T-2 Development of Phase 1 of the project would generate 1,343 A.M. peak hour trips and 1,327 P.M. peak hour trips, which would impact several of the study-area intersections. This represents a net increase of 769 A.M. and 821 P.M. trips over the traffic which would be generated by re-use of the existing State Hospital facility. **(U)**	**T-2(a) Las Posas Road/U.S. 101 SB Ramps**. The following lanes would be required. NB: 2 Thru, 1 Thru/Right, 1 Right SB: 1 Left, 2 Thru, 1 Right EB: 2 Left, 1 Left/Thru, 2 Right WB: I Left, 2 Right **T-2(b) Las Posas Road/Pleasant Valley Road**. This location is forecast to operate at LOS D during the peak commute periods. LOS D is considered acceptable by the City for short time periods. Mitigations are therefore not recommended. **T-2(c) Lewis Road/Daily Drive**. The following lanes would be required. NB: 1 Left, 2 Thru SB: 2 Thru, 1 Right EB: 1 Left, 1 Right **T-2(d) Lewis Road/Ventura Blvd**. This location is forecast to operate at LOS D during the peak commute periods. LOS D is considered acceptable by the City for short	Road widenings would result in secondary impacts to agricultural land, air quality, and noise. Impacts to agricultural land would be significant and unavoidable.

Table B.3-1. Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measures	Residual Impact
	time periods. Mitigations are therefore not recommended. **T-2(e) Lewis Road/Pleasant Valley Road.** The following lanes would be required. NB: 1 Left, 1 Thru, 1 Thru/Right SB: 1 Left, 2 Thru, 1 Right EB: 2 Left, 1 Thru, 1 Thru/Right WB: 1 Left, 2 Thru, 1 Right **T-2(f) Santa Rosa Road/U.S. 101 NB Ramps.** This location is forecast to operate at LOS D during the peak commute periods. LOS D is considered acceptable by the City for short time periods. Mitigations are therefore not recommended. **T-2(g) Santa Rosa Road/U.S. 101 SB Ramps.** The following lanes would be required. NB: 1 Left, 1 Thru/Right SB: 1 Left, 1 Left/Thru, 1 Right EB: 2 Thru, 1 Thru/Right WB: 1 Left, 2 Thru, 1 Right	
T-3 Buildout of the Campus Master Plan would result in the addition of 36,535 ADT to the roadways adjacent to the site. This represents a net increase of 27,229 ADT over the traffic that would be generated by the existing State Hospital facility. **(U)**	The following mitigation measures would address cumulative impacts to roadway network intersections, of which the proposed project is a part. **T-3(a) U.S. Highway 101.** Widen to 10 lanes within the Camarillo area. It is noted that the need for this widening would be generated as a result of buildout in the Ventura County area and would be required with or without Campus Master Plan traffic. **T-3(b) Pleasant Valley Road.** Widen to 4 lanes between Lewis Road and the existing 4-lane section in the City of ~~Oxnard~~ Camarillo. **T-3(c) East 5th Street.** Widen to 4 lanes from Pleasant Valley Road to Oxnard. **T-3(d) Lewis Road.** Widen to 4 lanes from U.S. Highway 101 to south of the University. **T-3(e) Cawelti Road.** Widen to 4 lanes from Las Posas Road to Lewis Road.	Many mitigation measures recommended to address traffic congestion problems involve roadway system expansion in the form of widenings to add capacity within the regional roadway network. These widenings are likely to result in significant impacts in the areas of agricultural resources, noise, water quality, and air quality. Road segment widenings would result in cumulatively significant and

Table B.3-1. Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measures	Residual Impact
	T-3(f) Las Posas Road. Widen to 6 lanes from U.S. Highway 101 to Pleasant Valley Road and to 4 lanes south of Pleasant Valley Road. **T-3(g) Camarillo Drive.** Widen to 4 lanes between the campus and Lewis Road, or provide for four lanes on the Santa Barbara Avenue extension between the campus and Lewis Road. CSUCI may determine in the future that the Santa Barbara Avenue extension should be the primary access to the campus, depending on ultimate campus layout. In the interim, the Santa Barbara Avenue extension should be constructed to 2 lanes and signage should be in place to direct traffic to its use.	unavoidable impacts related to the loss of agricultural land.
T-4 Buildout of the Campus Master Plan would result in the addition of 3,438 A.M. and 3,321 P.M. peak hour trips to the intersections in the study-area. This represents a net increase of 2,880 A.M. and 2,799 P.M. peak hour trips over the traffic which would be generated by the existing State Hospital facility. **(U)**	The following mitigation measures would address cumulative impacts to roadway network intersections, of which the proposed project is a part. **T-4(a) Las Posas Road/Pleasant Valley Road.** The following lanes would be required. NB: 1 Left, ~~1~~ 2 Thru, 1 Thru/Right SB: 1 Left, 1 Thru, 1 Thru/Right, 1 Free Right EB: ~~1~~ 2 Left, 1 Thru, 1 Thru/Right WB: ~~2~~ 1 Left, ~~1~~ 2 Thru, ~~1 Thru/Right~~ 1 Right **T-4(b) Las Posas Road/5th Street.** The following lanes would be required. NB: 1 Left, 1 Thru, 1 Thru/Right SB: 1 Left, 2 Thru, 1 Thru/Right EB: 2 Left, 1 Thru, 1 Thru/Right WB: 1 Left, 1 Thru, 1 Thru/Right **T-4(c) Lewis Road/Pleasant Valley Road.** The following lanes would be required NB: 1 Left, 2 Thru, 1 Right SB: 1 Left, 2 Thru, 1 Right EB: 2 Left, 1 Thru, 1 Thru/Right WB: 2 Left, 1 Thru, 1 Thru/Right **T-4(d) Santa Rosa Road/U.S. 101 NB Ramps.** The following lanes would be required NB: 1 Left, 1 Left/Right, 1 Right EB: 3 Thru, 1 Right WB: 2 Thru, 1 Thru/Right, 1 Right	Many mitigation measures recommended to address traffic congestion problems involve roadway system expansion in the form of widenings to add capacity within the regional roadway network. These widenings are likely to result in significant impacts in the areas of agricultural resources, noise, water quality, and air quality.

Table B.3-1. Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measures	Residual Impact
	T-4(e) Santa Rosa Road/U.S. 101 SB Ramps. This location is forecast to operate at LOS D during the peak commute periods. LOS D is considered acceptable by the City for short time periods. Mitigations are therefore not recommended. **T-4(f) Pleasant Valley Road/Pancho Road.** This location is forecast to operate at LOS D during the peak commute periods. LOS D is considered acceptable by the City for short time periods. Mitigations are therefore not recommended. **T-4(g) Camarillo Drive/Lewis Road.** Signalize intersection. **T-4(h) Las Posas Road/Cawelti Road.** Signalize intersection. **T-4(i) Lewis Road/Cawelti Road.** Signalize intersection. **T-4(j) Lewis Road/Santa Barbara Avenue extension.** Signalize intersection. **T-4(k) Lewis/Hueneme Road/Potrero Road.** Signalize intersection. An alternative mitigation scenario associated with the Lewis Road/Highway 101 interchange improvement is as follows: **T-3(d). Lewis Road.** Widen to 6 lanes from US Highway 101 south to the University entrance at Camarillo Drive. **T-3(e). Cawelti Road.** Delete, widening to 4 lanes is not necessary. **T-4(a).** No change from above. **T-4(b). Las Posas/5th** Delete; no improvements beyond those currently planned are needed.	

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Table B.3-1. Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measures	Residual Impact
	New T-4(b) Lewis Road/Daily Drive. The following lanes are needed. NB: 2 Left, 2 Thru SB: 2 Thru, 1 Right EB: 2 Left, 1 Right **T-4(c). Lewis/Pleasant Valley** The following lanes are needed. NB: 1 Left, 3 Thru, 1 Right SB: 1 Left, 3 Thru, 1 Right EB: 2 Left, 2 Thru, 1 Right WB: 2 Left, 1 Thru, 1 Thru/Right **T-4(d) - T-4(k).** No change from above.	
GROWTH INDUCEMENT		
Impact	**Mitigation Measures**	**Residual Impact**
Long term development of the project would generate increased economic activity in the region.	None necessary.	Potential economic growth is accommodated in existing plans.
Development of the site would result in direct and indirect population growth.	None necessary.	Potential population growth is within existing planned parameters.
Project could remove obstacles to growth of adjacent parcels through the amendment of the County General Plan regarding the "State or Federal Facility" designation or if connection to infrastructure within the project site were allowed.	**GI-1** Concurrent with its adoption of the Campus Master Plan, the University shall recommend to the County that the General Plan land use designation for Assessor Parcel No. 234-05-19 be changed to "Agricultural" to reflect the existing and planned land use for this parcel. **GI-2** The University shall agree not to provide easements or land areas for development support infrastructure (water and sewer lines, drainage infrastructure, and general service access roads) to land areas designated "Agricultural" or "Open Space" in the Ventura County General Plan and that lie adjacent to the 634-acre project site. **GI-3** The University and the Site Authority shall cooperate with any viable land conservancy that proposes to purchase land on its borders for the purposes of agricultural land preservation, open space protection, or habitat restoration.	Implementation of these measures would further reduce the potential for secondary growth impacts.

B.3.3 Mitigation Responsibility

CEQA provides that each public agency shall mitigate or avoid the significant effects on the environment of projects it approves or carries out whenever it is feasible to do so (Public Resources Code § 21002.1[b]). In mitigating or avoiding a significant effect of a project on the environment, a public agency may exercise only those express or implied powers provided by law other than under CEQA (PRC § 21004). The California State University has specific powers to mitigate effects that occur within its jurisdiction, namely within the campus, but limited powers for those that occur outside of the project site. Because of these limitations, it is not feasible for the California State University to mitigate offsite impacts, as is further discussed below. In addition, the State of California has a clear constitutional and statutory assignment of responsibilities for various public works and methods for allocating revenues to pay for these facilities.

Local agencies frequently impose fees for the mitigation of project specific and cumulative impacts to finance the fair share cost of infrastructure improvements needed to accommodate growth. Such imposition of fees can occur only for those entities that are within the jurisdiction of that local agency. The California State University as a state agency is not within the jurisdiction of local agencies. The California Constitution, Article 9, Section 6, prohibits the University, as a component of the State's public school system, from being placed under the jurisdiction of a local government or other non-educational agency. Similarly, the courts have held that the CSU is exempt from property taxes generally and from most special assessments, such as impact mitigation fees. However, the Legislature in Government Code § 54999 et. seq. has allowed local entities to negotiate with the State for the imposition of "capital facilities fees" for the connection of specified utility services. Therefore, insofar as CSU agrees with a local entity for a capital facilities fee, such as needed expansion of a wastewater treatment facility to accommodate university growth, that amount may be assessed CSU. Utilities covered under §54999 include water, light, heat, communications, power, garbage service, flood control, drainage, sanitation and sewage collection, treatment, and disposal. With regard to the project site, either the CSU would negotiate with the local agencies as established by statute, or the Site Authority would under its own legislative authority.

In order for the State, including CSU, to expend State money, the State must receive in return a benefit that has some relationship to the amount spent. The California Constitution in Article XVI, Section 6, forbids the State from making a gift of public funds. Although the courts have been liberal in finding a public purpose for expenditures which have been made, there is a limit to that liberality. If there is no legal duty to pay and the State then makes a payment, the issue of whether a gift of public funds arises.

Beyond the constitutional proscription is a statutory issue as to whether money has been appropriated in a State budget for making a payment. Again, the courts have been liberal in deferring to the discretion of the officers charged with the decision to pay. Nevertheless, before a payment of State money is made, two questions should be asked: 1) Is the State receiving benefit for the payment? and 2) Are there funds appropriated in the State budget to make the payment? Funding for schools, for example, is made under separate State appropriations which are formulated on the *Serrano v. Priest* (1976) 135 Cal Rptr 345 decision requiring equal

support to the students of all the State's public schools. In addition under Proposition 98 (1988) the schools are entitled to a set percentage of the State's budget. The CSU has no such guaranty. Thus it is highly inappropriate to divert limited funding from higher education to local schools. The State has regulated the amount of fees that private developers may be charged (see Government Code Section 66000 et seq.). With the exception of utilities, it has not authorized assessments against itself.

California State University is funded to provide public higher education. Its mission is set forth in Education Code Section 66608. Its revenue is basically from the State general fund appropriation (including appropriation of student fee income). Unlike cities and counties it does not directly receive income from sales, transient occupancy, real estate, or gasoline taxes. Nor is it allocated federal highway funds.

Since a primary source of road and highway funding is gasoline and sales tax, it is appropriate that local streets and roads be funded by local government. Separately, the State funds State highways through its State Transportation Commission and Caltrans. The CSU has no direct access to Caltrans financing.

Provision of regional roads is not within the jurisdiction of the California State University. The University does not for example have the power of eminent domain. The prioritization and funding of State highways is the responsibility of the State Transportation Commission (see Streets and Highways Code Section 70 et. seq.). Through the Highway Users Tax Fund and the Federal Aid for Secondary Highways (Government Code Section 2200 et. seq.), the State has adopted a funding mechanism for county road systems. Funding of county roads is not a responsibility of the California State University as this lies within the jurisdiction of the county. Therefore, mitigation measures suggested within this EIR are the responsibility of the County or other public agencies with local jurisdiction and responsibilities for roads and highways.

The State as with other public agencies is also not responsible for fire protection fees for development purposes (Health and Safety Code Section 13916[a]). Indeed, even in the absence of Section 13916, the State would not be subject to a district exaction in the absence of a specific legislative authorization.

In summary, CSU is only subject to capital facilities fees as defined under Government Code Section 54999.1 and the manner in which its contributions are determined are provided in that code. These sections do not include contributions for transportation, schools (K-12), police, fire, or similar fee and assessment contributions exacted from private developers. Correspondingly, the California State University does not exact financial contributions from local governments or developers for construction of University facilities.

The CSU does not contend that any private development not connected to CSU's educational and research mission is exempt from local regulation and possessory interest taxation like other private parties.

In contrast to the California State University, if the proposed California State University, Channel Islands Site Authority is enacted, it would be an agency responsible for potential

mitigation efforts. The Site Authority would have the ability to collect ad valorem property taxes and adopt a plan to use such monies to mitigate project-specific and cumulative onsite and offsite impacts attributable to the development of the campus (proposed Government Code Section 67478). Such a plan could be adopted to aid in financing improvements to the local transportation system, and to pay for various other fee assessments. This can only occur if the legislation is enacted by the State Legislature in a form similar to the current version (last amended May 26, 1998).

B.4 SUMMARY OF ALTERNATIVES

A range of reasonable alternatives to the proposed Campus Master Plan is required to be evaluated within an EIR per the *State CEQA Guidelines* §15126(d). The alternatives addressed in this document are those that could feasibly attain the basic objectives of the project, with the discussion focusing on the comparative merits of the alternatives relative to environmental effects (without consideration of economic effects) and on alternatives that could substantially reduce or eliminate significant adverse impacts. Alternatives addressed in this EIR in Section 7.0 include:

No Project Alternative
- *No Additional Reuse*
- *Correctional Institution*
- *Office*

Alternative Project Sites
- *Donlon Site*
- *Chaffee/Duntley Site*
- *Sudden Ranch Site*

Alternative Master Plan Concepts
- *No Santa Barbara Avenue Extension*
- *No Golf Course*
- *25,000 FTES Campus*
- *No Redevelopment of East Campus*

The "environmentally superior" alternative is that which would cause the least amount of adverse change in the physical environment, which in most cases is the "no project" alternative. In this case the "no project" alternative would either include no reuse of the facility (continued shutdown), or reuse and redevelopment of the former Camarillo State Developmental Hospital since it can be expected that the State of California would institute a productive use of the more than 1.6 million square feet of developed space present at the site. If the site remains in its "shutdown" condition, it can be expected that the buildings will ultimately deteriorate as maintenance is not performed and vandalism and the physical elements damage the structures. Since it is economically impractical for the State to continue the "warm shutdown" state, the two alternative uses that are most likely to occur at the site include correctional institution and office. Another consequence of the "no project" alternative is that the university for Ventura County would be developed at another location, probably the Orchard Site (formerly Chaffee/Duntley Site) previously acquired by the CSU for that purpose. Therefore, the "no project" alternative would include not only those impacts associated with long term deterioration of the site or, alternatively, reuse of the site, but also the impacts of campus

development at an alternative site. Site-specific significant impacts associated with reuse of the site under the "no project" alternative include degradation of aesthetic views, increased air pollutant emissions, potential impacts to historic structures, geological hazards relating to strong seismic shaking, solid waste generation, and traffic congestion.

The three alternative sites were previously studied in the *California State University Ventura Campus Site Acquisition EIR* (1991). As a consequence of this analysis, a 260 acre portion of the Chaffee/Duntley Site was acquired for future university development. It is noted that the Camarillo State Hospital was not recognized as a potential alternative site at the time that the Chaffee/Duntley Site was chosen. Significant impacts associated with these three alternative sites include obstruction of views from scenic roads and alteration of landscape characteristics, increased air pollutant emissions, removal of oak trees and eucalyptus windrows at the Donlon Site, exposure to liquefiable and expansive soils, exceedance of downstream drainage channel capacities, contribution of urban-related pollutants to stormwater flows, unavoidable loss of farmland, exceedance of local sewer line capacities, solid waste generation, and traffic congestion.

Four alternative design concepts were considered for the site, all of which would include reuse of the campus core by the University. The No Santa Barbara Avenue Extension would possibly reduce the loss of agricultural lands below the County's 5-acre significance criteria at the expense of more traffic congestion at Camarillo Drive or rerouting traffic onto Potrero Road. Routing of additional traffic to Potrero Road may result in farmland losses for road widening purposes, damage to known cultural resources, and increased traffic safety hazards. The No Golf Course Alternative would eliminate potential water quality impacts associated with golf courses while reducing the revenue-production ability of the site (one of the project objectives). The 25,000 FTES University would cause the greatest impacts on traffic, air quality, and traffic noise. Since mitigation measures to address traffic impacts would be greater, secondary impacts to agricultural resources would also be higher, since much of the road widening would occur on prime agricultural lands.

The No Redevelopment of East Campus alternative would result in a 15% reduction in vehicular trips, thereby reducing traffic, air quality, and noise effects. However, these impacts would remain significant to the same degree as the proposed project. This alternative would reduce impacts associated with historic structures and wetland loss and reduce water quality and drainage impacts. Overall, the No Redevelopment of East Campus alternative would be the Environmentally Superior Alternative. It is noted that neither this alternative nor the 25,000 FTES University meet the objectives for the project, particularly that the proposed project should provide a source of funding for development of the campus. These alternatives do not meet the objectives associated with providing alternative funding mechanisms to advance CSU's educational goals.

B.5 ISSUES TO BE RESOLVED

The Trustees of the California State University must determine if the proposed reuse of the former Camarillo State Hospital meets the needs of their academic programs and goals of the University system. As part of this decision, the Trustees need to determine if they will accept

responsibility for the site from the State Department of General Services. The Trustees must also determine if the proposed uses are compatible with the surrounding land uses and the relationship of the school to the Ventura County community and the type and nature of educational and cultural services to be provided by the campus. As part of the determination of compatibility, the Trustees will need to determine if the future Specific Plan to be processed through the County of Ventura would sufficiently resolve potential inconsistencies with County planning policies. As part of the Specific Plan and development agreement, the Trustees in cooperation with the County of Ventura will need to determine the appropriate permitting procedures for future construction and the appropriate jurisdictional entity.

As part of their decision-making process, the Trustees will also need to consider the alternative designs and uses possible for the site. Also, if the proposed project site is approved for use by the University, the Trustees will need to determine the disposition of the 260-acre Orchard Site previously acquired for development of the Ventura Campus of the California State University. It is currently proposed that the University retain ownership of this property and continue to lease it to agricultural interests, with the revenue so generated being used for continued operations at the Channel Islands site.

If the property is accepted by the Trustees and the proposed Campus Master Plan approved, the Trustees must also determine if the mitigation measures recommended in this EIR adequately reduce the impacts associated with University use of the project site. They must also decide if the measures are reasonable and whether or not they should be imposed and to what level. To the extent that they can, the Trustees would also make a determination regarding the responsibility for implementation of measures. As part of their decision-making, the Trustees will need to make findings regarding those impacts that are considered unavoidably significant and those impacts that are significant but mitigable.

The State Legislature will be determining whether or not the Site Authority would be enacted into law. If the Site Authority is enacted, it will have certain powers that include the ability to mitigate a fair-share basis of the project-specific and cumulative onsite and offsite environmental impacts attributable to long term development of the campus. If the Site Authority is not enacted, the University would need to determine the level to which it can mitigate impacts in keeping with restrictions on its powers as contained within the Education Code.

SECTION C. EIR MODIFICATIONS/CLARIFICATIONS

This section of the Final Program EIR for the California State University, Channel Islands Master Plan presents modifications to the Draft Program EIR text as a result of the response to comments or further informational clarifications, except for changes in the Summary Section which were contained in Section B. Deletions are noted by ~~strikeout~~ and insertions by underline.

Page 1-1. Make the following pages to the second paragraph:

> The CSU obtained 425 acres of agricultural land in 1969 in ~~Somis~~ the western part of the Las Posas Valley for the purpose of establishing a Ventura County campus, but no campus was developed. In March 1976, the sale of the 425 acres was authorized.

Page 2-9. Add the following summary after Impact AES-2.

Impact	Mitigation Measures	Residual Impact
AES-3 The proposed project would create new sources of light and glare through the construction of new buildings, lighting for sports facilities, and new parking areas. **(S)**	**AES-3(a)** Illumination of all parking areas should be accomplished in a manner that minimizes spillage of light canopies away from the lit area. Light standards shall be designed to achieve one (1) foot-candle at the property line, considering weather conditions. **AES-3(b)** Overhead lighting fixtures to light roads and parking areas shall not exceed 20 feet in height. **AES-3(c)** Top decks of parking structures shall be illuminated with floor-mounted bollards or half-wall mounted fixtures to provide splash lighting to the parking surface areas. Bollards shall not exceed six feet in height.	Less than significant.

Page 2-27. Append the following summary to the end of Table 2.3-1.

GROWTH INDUCEMENT		
Impact	**Mitigation Measures**	**Residual Impact**
Long term development of the project would generate increased economic activity in the region.	None necessary.	Potential economic growth is accommodated in existing plans.
Development of the site would result in direct and indirect population growth.	None necessary.	Potential population growth is within existing planned parameters.
Project could remove obstacles to growth of adjacent parcels	**GI-1** Concurrent with its adoption of the Campus Master Plan, the University shall	Implementation of these measures

through the amendment of the County General Plan regarding the "State or Federal Facility" designation or if connection to infrastructure within the project site were allowed.	recommend to the County that the General Plan land use designation for Assessor Parcel No. 234-05-19 be changed to "Agricultural" to reflect the existing and planned land use for this parcel. **GI-2** The University shall agree not to provide easements or land areas for development support infrastructure (water and sewer lines, drainage infrastructure, and general service access roads) to land areas designated "Agricultural" or "Open Space" in the Ventura County General Plan and that lie adjacent to the 634-acre project site. **GI-3** The University and the Site Authority shall cooperate with any viable land conservancy that proposes to purchase land on its borders for the purposes of agricultural land preservation, open space protection, or habitat restoration.	would further reduce the potential for secondary growth impacts.

Page 3-7. Insert the following at the end of the first paragraph under Section 3.6.2.

> Also as part of the Specific Plan process, the County may amend its General Plan to eliminate inconsistencies with existing land use policies stated for the land use designation for State or Federal Facilities and the Urban Centers policy, amend the Regional Road Network plan to accommodate the widening of Cawelti Road and Las Posas Road, change the land use zoning within the site in accordance with proposed land uses, and amend the County's Traffic Mitigation Fee Ordinance.

Page 3-9. Enlarge the text of Figure 3-4 to more clearly show Santa Barbara Avenue, Rincon Drive, Santa Paula Avenue, and Ventura Street.

Page 5.2-3. Add the following to the last paragraph on the page.

> Other nearby sensitive receptors are the Association for Retarded Citizens facilities, Las Posadas Mental Health Care Facility, and Casa Pacifica Crisis Care Facility, located along Lewis Road between Cawelti Road and Camarillo Drive.

Page 5.2-5. Make the following change to the second paragraph.

> As outlined in the APCD Guidelines, projects that are inconsistent with the Ventura County AQMP and emit greater than 2 pounds of ROC or NO_x per day would contribute to a significant air quality cumulative impact.

Page 5.2-6. Make the following insert to the fourth bullet in the list for Measure AQ-1(a).

- All construction traffic on-site along dirt roads shall be limited to 15 miles per hour or less.

Page 5.2-7. Make the following change to paragraph 3.

Table 5.2-3 shows the estimated long-term ~~traffic~~ mobile source pollutant emissions…

Page 5.2-9. Make the following changes to the Mitigation Measure AQ-2(a):

AQ-2(a) The university shall implement a Trip Reduction Program that would include campus van and car pools. All on-site vans or buses shall be electric powered or shall run on clean fuels. The Trip Reduction Program shall be evaluated annually by University transportation officials and modified as necessary to achieve reasonably feasible trip reduction benefits. The Trip Reduction Program shall be initially designed considering the following optional strategies:

Ridesharing
- *carpool/vanpool match*
- *preferential parking for carpools and vanpools*
- *financial subsidies or rewards to carpool/vanpool/buspool passengers including drivers **
- *employer-sponsored vanpools **
- *carpool/vanpool/buspool operating subsidies, e.g. insurance, fuel, maintenance, etc. **

Transit
- *subsidized bus passes for students **
- *work site ticket sales*
- *financial subsidies/rewards to transit users, e.g. Commuter Check™ **
- *transit route maps and schedules on-site*
- *shuttle transit line (employer-sponsored or subsidized) **
- *work with VCTC to extend VISTA bus service onto campus*

Trip Elimination
- *distance learning/satellite education centers*
- *consolidated/coordinated scheduling of classes*

Parking Management
- *reduced parking rates for carpools and vanpools only*
- *preferential parking for clean fuel vehicles*
- *campus parking pricing scheme to reduce vehicle trips where consistent with CSU fee policies*

Bicycle and Pedestrian
- *financial subsidies to bicycle or pedestrian commuters including purchase of equipment for commute trip purposes **
- *bicycle lockers or other secure, weather-protected bicycle parking facilities*

- *bicycle and/or walking route information*
- *on-site bicycle registration*
- *employee shower facilities and clothes lockers*
- *financial subsidies/rewards for walking and other non-motorized transportation modes **
- *active participation and promotion of "Bike to Work Week"*

On-Site Facilities/Services

- *site planning that would encourage walking, transit, carpool, vanpool and bicycle use*
- *restrict vehicle access within the campus perimeter*
- *on-site services to reduce mid-day vehicle trips, e.g. cafeteria, ATMs, apparel cleaning, etc.*
- *permit access to the proposed onsite child daycare center for University staff, students, and employees of the research office uses*
- *refueling/recharging facilities for clean fuel vehicles used for employee/student commute trips, e.g. electric, compressed natural gas vehicles*
- *on-campus housing preference to students that do not require parking accommodations*

Promotional and Marketing Activities

- *ridesharing marketing campaigns*
- *on-site transportation fair to promote commute alternatives*
- *participation in "California Rideshare Week"*

Other

- *class scheduling during non-peak hours*
- *membership in a Transportation Management Association that provides services and incentives **
- *establishment of employee committee to help design, develop, and monitor the trip reduction program*
- *enhanced trip reduction efforts on forecast criteria pollutant exceedance days*
- *financial subsidies/rewards for clean vehicles used for employee commute trips including carpool and vanpool vehicles **
- *assistance to employees in locating their home residence closer to the work site and/or along transit routes*
- *trip reduction measures to reduce non-employee vehicle trips to the work site, e.g. busing for student populations, delivery trips, etc.*

** The financial feasibility of these optional strategies are reliant on funding that would be dependent upon availability and allocation of parking citation revenue available to CSUCI for alternative transportation.*

Page 5.2-10. Make the following corrections to the 3rd line of the 4th paragraph.

...Section ~~5.5 *Traffic and Circulation*~~ 5.10 *Transportation/Traffic* ...

Page 5.3-13. Change the following typo in the last paragraph.

> Past use of the project site for the Camarillo State Hospital and the past agricultural uses associated with the hospital has eliminated the natural plant communities that were ~~formally~~ formerly located in the flatlands of the site.

Page 5.3-15. Make the following changes to Mitigation Measure BIO-1(a).

BIO-1(a) The open space portions of the Campus Master Plan shall be managed by the University ~~as a biological preserve~~ to maintain its biological resources, and Round Mountain shall also be managed as a cultural resource. Prior to any construction, vegetation clearing, or other change in the natural characteristics of this area, the University shall consult with the Biology Department regarding the biological consequences and any recommended procedures. ~~delineate all feasible mitigation measures to control any potential impacts~~.

Page 5.3-15. Add the following mitigation measures.

BIO-1(c) The CSU shall post signs prohibiting indiscriminate access into the surrounding hillsides. Such signage shall be included with those marking the location of designated trails. Warning signs regarding the presence of rattlesnakes shall similarly be posted.

BIO-1(d) The CSU shall prepare a landscaping plan for the open space buffers between the developed portions of the site and native open space vegetation. This landscaping plan shall contain a palette that is appropriate to ensure compatibility between the landscaped areas and the native plants while maintaining the historical landscaping palette present within the developed portions of the site. Those plants known to be invasive species shall be excluded from the landscaping palette.

Page 5.4-6. Make the following addition to Mitigation Measure C-1:

C-1 Should unanticipated cultural resource remains be encountered during construction or land modification activities, work must stop, and the University shall contact an archaeologist to provide a qualified assessment of the nature, extent and possible significance of any cultural remains. If significant resources are encountered or inadvertently damaged, the University shall implement the recommendations of the archaeologist with respect to documenting and safeguarding the resource, and restoring or repairing any damaged artifacts or resources.

Page 5.4-8. Make the following change to Mitigation Measure C-3(a).

C-3(b) Employee Housing Home 1 should be considered for reuse, possibly as part of a community center or ~~possibly~~ the academic enhancement center.

Page 5.4-8. Insert the following mitigation measure following Measure C-3(b).

C-3(c) The CSU will continue to consult with the State Historic Preservation Officer for individual adaptive reuse building rehabilitation projects.

Page 5.6-12. Make the following changes to the beginning of the last paragraph:

Irrigation water for the golf course would be reclaimed water from the Camrosa wastewater treatment facility. Camrosa currently pumps its effluent to storage ponds located north of the project site and the Camarillo Regional Park and reclaims much of its effluent through sales to area growers. Discharges of excess reclaimed water occur during the winter into Conejo Creek in the vicinity of storage ponds upstream of the Campus Master Plan area. ~~This water is currently being discharged directly into Calleguas Creek south of the Lewis Road bridge.~~ This irrigation water source is not expected to exhibit water quality problems beyond those that may currently exist, but the addition of fertilizers, pesticides and other chemicals to the golf course has the potential to add these materials to the groundwater and surface water run-off.

Page 5.6-14. Make the following addition to the footnote at the bottom of the page.

For the campus this agency is the CSU Risk Management Authority and/or a designated official at each campus under the Office of the Chancellor.

Page 5.6-15 and 5.6-16. Make the following changes to Mitigation Measure HYD-5(c).

HYD-5(c) A groundwater monitoring well shall be installed by the golf course operator at the point where golf course drainage flows to receiving channels. The wells must meet the minimum requirements of Bulletin 74-90 (California Well Standards) and the Ventura County code. The wells shall be sampled by the operator on a quarterly basis for a minimum of three years, and then semi-annually for at least an additional seven years for a total of 10 years, with the sampling reports sent to the CSUCI ~~CSU Risk Management Authority~~ and the Regional Water Quality Control Board. At the end of ten years, the data shall be analyzed to determine if there is a need to continue the monitoring. Constituents sampled for will include nitrate, phosphate and any pesticides applied to the golf courses. An initial well sample shall be taken at completion of grading, but before the installation of landscape vegetation.

Page 5.6-16. Make the following changes to Mitigation Measure HYD-5(d).

HYD-5(d) Surface water samples shall be taken within all drainages immediately downstream of golf course facilities at periods to be determined by the Best Management Practices Plan, but not more than quarterly. The samples shall be examined for nitrate and phosphate content, and any pesticides applied to the golf courses. Sampling reports shall be sent by the operator to the CSUCI ~~CSU Risk Management Authority~~ and the Regional Water Quality Control Board.

Page 5.8-8. Make the following pages to the third paragraph, immediately under *Effect 2*:

The Camarillo Regional Park Amphitheater was recently approved to be located to the north of the project site and this venue could generate sound levels that would be audible in portions of the residential component of the proposed project. The amphitheater would have a capacity of 16,000 and is permitted to hold up to ~~35~~ 30 concerts per year.

Page 5.8-10. Make the following correction to Mitigation Measure N-2(a)

N-2(a) The University shall not ~~approve~~ accept the Noise Abatement Plan for the amphitheater operations until the following are included:

Page 5.9-5. Make the following changes to the mitigation measures below:

PS-2(a) A long-term plan for recycling ~~should~~ shall be developed with specific collection goals for each recyclable material category and a method to track quantities of materials. A source reduction plan should include such policies as training custodial staff for recycling as part of their jobs.

PS-2(b) A source reduction plan ~~should~~ shall be developed and integrated with a long-term recycling plan. A source reduction plan should include measures to eliminate single use items, encourage reuse of materials, use of more durable materials, and eliminate unnecessary usage. Use of reusable mugs and drink discounts have been shown to reduce the solid waste stream significantly (by as much as 30% at University of Colorado).

PS-2(c) The University ~~should~~ shall promote the use of materials with recycled material content in them such as paper products. Disposable products that are used should be made of materials that can be easily collected on campus and recycled. For example, the plastics that are marked with numbers "1" or "2" are more readily recyclable than those plastic products marked with higher numbers.

PS-2(d) As part of the construction and demolition contracts, the University shall require that contractors purchase and utilize materials with ~~a~~ recycled content during the construction of University facilities.

PS-2(e) The University ~~should~~ shall prepare and implement an organics recycling plan which would identify methods of recycling or reducing green waste collected from the project site through mulching or small-scale composting activities. Space allocation for on-site mulching and composting activities should be provided at the facilities maintenance yard. Any composting shall meet recent new standards concerning the control of pathogens.

Page 5.10-3. Insert following text change for Las Posas Road.

"...to its terminus at State Route 1, adjacent to Point Mugu State Park and NAWS Point Mugu."

Page 5.10-15. Add the following sentence to the end of Mitigation Measure T-1(a).

The section of Lewis Road north of Cawelti Road would carry 15,200 ADT with buildout of Phase 1. This increase in traffic will require improvements to the existing 2-lane roadway to provide adequate shoulder areas and standard lane widths as required by the County of Ventura.

Page 5.10-17. Add the following sentence to the end of Mitigation Measure T-1(c).

This increase in traffic will also require improvements to the existing 2-lane roadway to provide adequate shoulder areas and standard lane widths, as required by the County of Ventura.

Page 5.10-17. Add the following after the end of Mitigation Measure T-1(c)

The road widenings recommended above would result in secondary impacts to agricultural land, air quality, and noise. The additional loss of agricultural land associated with the road widenings would be considered significant and unavoidable.

Page 5.10-17, 5.10-18. The footnote in the table should be corrected to read.

Net Project-Added Critical Trips = Short-Term + CSU Phase 1 minus Short-Term + Hospital.

Page 5.10-21. Correct ADT volume in Figure 5.10-7 for Cawelti Road from "20,000" to "2,000".

Page 5.10-22. Modify Mitigation Measure T-3(b) as follows.

T-3(b) Pleasant Valley Road. Widen to 4 lanes between Lewis Road and the existing 4-lane section in the City of ~~Oxnard~~ Camarillo.

Page 5.10-24. Correct ADT volume for Cawelti Road in Figure 5.10-9 from "35,286" to "17,286".

Page 5.10-26, 5.10-27. The footnote in the table should be corrected to read.

Net Project-Added Critical Trips = General Plan + CSU Phase 1 minus General Plan + Hospital.

Page 5.10-26. Make the following changes concerning the ultimate geometrics for the Los Posas Road/Pleasant Valley Road interchange.

T-4(a) Las Posas Road/Pleasant Valley Road. The following lanes would be required to provide an acceptable level of service at this intersection.

Northbound	Southbound	Eastbound	Westbound
L TT TR	L T TR R*	LL TTR	~~LL~~ TT ~~TR~~ R

* *Provide a free right turn lane.*

Page 5.10-28. Insert following text.

At the request of staff at the City of Camarillo and the VCTC, a supplemental traffic analysis was completed for the Lewis Road and Las Posas Road corridors assuming implementation of the Lewis Road/U.S. Highway 101 interchange improvement project. The interchange project may result in an alternative trip distribution assignment in which the Lewis Road interchange would be the preferred freeway access for CSUCI (it would be signed for CSUCI) and trips assigned to the Las Posas Road interchange at U.S. Highway 101 would be reduced. While this intersection improvement has been preliminarily funded, the Project Study Report, CEQA analysis, detailed design and engineering studies for this improvement have not been completed.

An alternative trip distribution was developed in conjunction with the City of Camarillo staff and the trip assignments for the University were modified based on the interchange improvement plan. However, the actual distribution of trips to occur 20 years in the future is difficult to forecast as it is dependent on future roadway volumes, which will be affected by the actual growth that occurs in the area. This alternative trip distribution assumes that most of the traffic associated with the CSUCI campus will use the new Lewis Road interchange. However, if the freeway becomes congested between Las Posas Road and Pleasant Valley Road, it is likely that campus-related traffic will choose to use the distribution pattern previously forecasted without the Lewis Road interchange improvements. These two alternative trip distributions therefore represent a range within which the actual future distribution is likely to occur.

Intersection levels of service based on the alternative trip distribution were calculated assuming the new Buildout + Project volumes. Tables 5.10-12 and 5.10-13 show the revised levels of service for the intersections affected by the Lewis Road/U.S. Highway 101 interchange improvement project.

Table 5.10-12.
A.M. Peak Hour Buildout Levels of Service - With Lewis Road Interchange Project

Intersection	ICU / LOS		Project Added Critical Trips	Impact
	Buildout	Buildout + CSUCI		
Las Posas Rd./U.S. 101 SB Ramps	0.68/LOS B	0.68/LOS B	0	NO
Las Posas Rd./Pleasant Valley Rd.	0.78/LOS C	**0.83/LOS D**	**73**	**YES**
Las Posas Rd./5th St.	0.62/LOS B	0.79/LOS C	274	NO
Lewis Rd./Daily Dr.	0.59/LOS A	0.80/LOS C	351	NO
Lewis Rd./Ventura Blvd.	0.64/LOS B	0.69/LOS B	78	NO
Lewis Rd./Pleasant Valley Rd.	0.54/LOS A	**1.10/LOS F**	**923**	**YES**

Table 5.10-13
P.M. Peak Hour Buildout Levels of Service - With Lewis Road Interchange Project

Intersection	ICU / LOS		Project Added Critical Trips	Impact
	Buildout	Buildout + CSUCI		
Las Posas Rd./U.S. 101 SB Ramps	0.89/LOS D	0.89/LOS D	0	NO
Las Posas Rd./Pleasant Valley Rd.	0.85/LOS D	**0.87/LOS D**	**33**	**YES**
Las Posas Rd./5th St.	0.66/LOS B	0.80/LOS C	226	NO
Lewis Rd./Daily Dr.	0.49/LOS A	**1.04/LOS F**	**876**	**YES**
Lewis Rd./Venture Blvd.	0.50/LOS A	0.56/LOS A	85	NO
Lewis Rd./Pleasant Valley Rd.	0.68/LOS B	**1.29/LOS F**	**991**	**YES**

The revised CSUCI trip distribution which may result from the Lewis Road/U.S. Highway 101 interchange project would generate significant impacts at the following intersections:

Las Posas Rd./Pleasant Valley Rd.
Lewis Rd./Daily Dr.
Lewis Rd./Pleasant Valley Rd.

Project related impacts at the Las Posas Rd./Pleasant Valley Rd. interchange would remain significant under this alternative, and the ultimate geometrics for this intersection given under Mitigation Measure T-4(a) above would need to be implemented. Impacts at the Lewis Rd./Daily Dr. intersection would be significant under this trip distribution alternative and additional mitigation would be required. Conversely, project impacts at the Las Posas Rd./5th St. intersection would be reduced under this scenario and would be less than significant. Mitigation T-4(b) previously outlined above to mitigate project impacts would not be required.

The need for mitigation measures and the actual improvements that would occur will be based on monitoring of traffic growth in the area. If trip distribution to the CSUCI campus follow the alternative trip distribution and area-wide growth occurs as projected, the intersection mitigation measures previously discussed above would be modified as follows:

Delete: ~~**T-4(b) Las Posas Road/5th Street.** The following lanes would be required to provide an acceptable level of service at this intersection.~~

~~Northbound~~	~~Southbound~~	~~Eastbound~~	~~Westbound~~
~~L T TR~~	~~L TT TR~~	~~LL T TR~~	~~L T TR~~

Add: **T-4(b) Lewis Road/Daily Drive.** The following lanes would be required to provide an acceptable level of service at this intersection.

Northbound	Southbound	Eastbound	Westbound
LL TT	TT R	LL R	

T-4(c) Lewis Road/Pleasant Valley Road. The following lanes would be required to provide an acceptable level of service at this intersection.

Northbound	Southbound	Eastbound	Westbound
L TTT R	L TTT R	LL TT R	LL T TR

Completion of the Lewis Road/U.S. 101 interchange improvement and the resulting reassignment of traffic generated by the CSUCI project would also require that Lewis Road be six lanes in width from U.S. Highway 101 to the campus. Mitigation T-3(d) would need to be revised to read:

T-3(d) Lewis Road. Widen to 6 lanes from U.S. Highway 101 south to the University entrance at Camarillo Drive.

Completion of the Lewis Road/U.S. 101 interchange improvement project and the resulting reassignment of traffic generated by the CSUCI project would significantly reduce project traffic loading on Cawelti Road. Based on the revised ADT forecast of 7,000 ADT to 8,000 ADT, widening of Cawelti Road to 4 lanes would not be required, and subsequent impacts associated with the loss of agricultural land and cumulative noise impacts would also be reduced. Mitigation T-3(e) would be deleted under this scenario.

Delete: ~~**T-3(e) Cawelti Road.** Widen to 4 lanes from Las Posas Road to Lewis Road.~~

Please note that shoulder improvements on Cawelti Road recommended by Mitigation Measure T-1(a) above would still be applicable for the cumulative build-out scenario.

Page 5.10-28. Add the following after the end of the above insert.

Many mitigation measures recommended above to address traffic congestion problems associated with the cumulative scenario involve roadway system expansion in the form of widenings to add capacity to the regional roadway network. These road widenings are likely to result in secondary impacts to agricultural resources, noise, water quality, and air quality. The additional loss of agricultural land associated with cumulative road widenings is not expected to exceed 20 acres. Nonetheless, this loss would be considered cumulatively significant and unavoidable.

Page 5.10-30. Insert the following paragraph after the third paragraph on the page, under "Transit."

Amtrak currently provides service to the Cities of Camarillo and Oxnard. This service could potentially serve the campus in the future if appropriate shuttle/transit systems were developed between the rail stations and the CSUCI campus.

Page 5.10-32. Revise text discussing the CMP thresholds as follows.

However, so that local jurisdictions are not unfairly penalized for existing congestion, CMP locations ~~currently~~ which were operating in the LOS F range at the time the original CMP was adopted are considered acceptable.

Page 5.11-2. Make the following changes to the first paragraph in Section 5.11.3, *Hazards*:

~~A second gasoline storage tank located by the S & T building is currently scheduled for removal. If contamination is found, the contaminated area is required to be remediated. A third underground diesel fuel storage tank is situated near the Boiler Plant. The tank is tested annually for leakage, and although no leakage has been detected, the tank is being replaced with a new surface tank.~~ Presently, there are four underground tanks at the Master Plan site. Three of these are diesel tanks, and one is a gasoline tank. One of the diesel tanks is located on the eastside of the S & T building. The other two diesel tanks and the gasoline tank is located near the boiler plant. All four are scheduled for removal and replacement with above-ground tanks by October 1998. The removal and efforts are being overseen by the State Department of General Services. As part of the removal process, the State Department of General Services will be required to test the remaining soils for any contamination. The County of Ventura Environmental Health Division will be required to review the assessment at that time, and will oversee any remediation efforts that may be required. Ultimately, the County of Ventura Environmental Health Division will rule on closure of these sites.

Appendix C - pg. 2 of the Observed and Expected Wildlife table. Make the following corrections.

Replace "Black-backed Woodpecker Picoides arcticus" with "Northern Flicker Colaptes auratus"
Add "O" to "Urban" column for the Western Scrub Jay.
Delete the rows containing "Yellow-Billed Magpie" and "Verdin".
Add "O" to "Urban" column for the Bushtit.

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