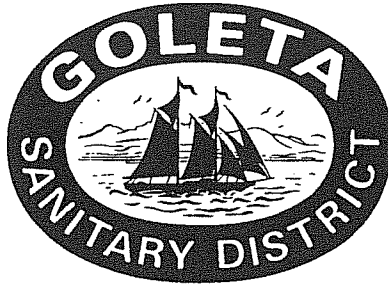


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June 19, 2008

Alissa Hummer
Campus Planning and Design
Facilities Management
c/o Vision 2025
UC Santa Barbara, CA 93106-1030

RE: Comments on Draft Environmental Impact Report for UCSB Long Range Development Plan Section 4.15 Wastewater

Dear Ms. Hummer:

This letter is submitted by the Goleta Sanitary District (GSD) in response to your draft environmental impact report (EIR) for UCSB's long range development plan (SCH No. 2007051128). The GSD has focused its review on Section 4.15 that deals exclusively with sewer service and wastewater treatment.

The following comments submitted by GSD are based on the March 2008 version of the EIR.

- 1) The GSD would like to point out that several discrepancies within Section 4.15 exist between data described in the narrative and numerical results presented in tables 4-15.1, 4-15.6 and 4-15.7. The District recommends that UCSB correct these discrepancies and submit this section for review.
- 2) Section 4.15.1.1 Study Area, mislabels the Goleta Sanitary District Boundaries figure as Figure 4.14-1. It should be identified in the text as figure 4.15-1. Figure 4.15-1 obtained from SB County Public Works Department, updated 4/28/03, is now outdated and does not show areas that have since been annexed to the GSD. A more recent map is available from the surveyor's office of the Santa Barbara County, dated September 2007 that should be used in this planning document.
- 3) The EIR projects that upon completion of all the proposed long range development the wastewater flows from the University will exceed their allotted capacity at full build out. The university offers two mitigation measures to mitigate the significance of this impact on the environment.
 - a) The first mitigation, WW-1A, would request that GSD and GWSD apply to the RWQCB to modify or re-issue each district's NPDES permit. GSD would like to clarify that only one NPDES permit governs capacity issues at the wastewater

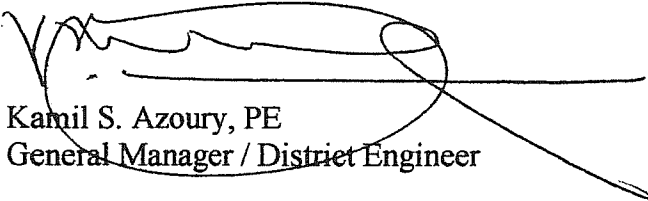
treatment plant and that permit is held by GSD who is the owner and operator of the treatment and disposal facilities. Any applications to the RWQCB to increase treatment capacity would have to be initiated by GSD. GSD does not have a permit with the RWQCB for either treatment or discharge of wastewater into the Pacific Ocean.

Furthermore, the GSD is in the process of upgrading the level of treatment at the wastewater treatment plant with no plans for increasing capacity. This project is required by the RWQCB in accordance with a settlement agreement between GSD and the RWQCB dated November 2004. The upgraded treatment facility will be completed and operational by November 2014. At this time the Facilities Planning Study has been completed, and the draft environmental documents are being circulated for public review. Both of these documents do not contemplate any increase in the treatment capacity of GSD's facilities. In order to maintain compliance with the settlement agreement mentioned above, GSD will not be in position to request from the RWQCB any increase in capacity as part of the currently ongoing project. Any increase in capacity that is deemed necessary will have to be separate from this project and should not impact the progress and completion of the upgrading project.

- b) The second mitigation measure WW-2B suggests that the University will negotiate the acquisition of additional capacity in the GSD wastewater treatment plant. This negotiation option is viewed as viable by the University based on a capacity study completed by Dudek and Assoc. in January 2006 that concluded GSD would have excess capacity at the proposed full build out of areas within its service boundaries. While the study projects the availability of slight excess capacity, GSD points out those growth projections may not be accurate and GSD does not believe it is prudent to sell any of its remaining capacity based on the results and assumptions made in the referenced Dudek report. GSD intends to retain and preserve its capacity allocation for the needs of its service area.

We appreciate the opportunity to offer you our comments and please do not hesitate to call upon us if you need further information.

GOLETA SANITARY DISTRICT



Kamil S. Azoury, PE
General Manager / District Engineer

Cc: kw