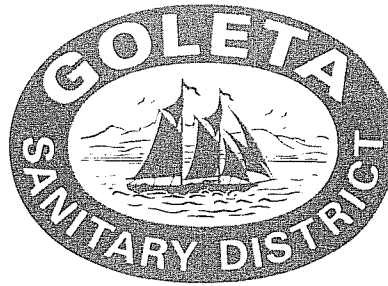


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March 26, 2009

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

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

To Whom It May Concern:

This letter is submitted by the Goleta Sanitary District (GSD) in response to your recirculated draft environmental impact report for UCSB's long range development plan (SCH No. 2007051128). This letter follows our initial comments sent in a letter dated June 19, 2008 to Alissa Hummer. As in the previous letter, GSD has focused its review on the revised Section 4.15 that deals exclusively with sewer service and wastewater treatment. The following comments submitted by GSD are based on the January 2009 version of the draft EIR.

1. Section 4.15.1.3 Goleta Sanitary District Wastewater Treatment Plant, paragraph 3 misstates that the proposed treatment plant upgrade will enable the District to reliably increase the production of recycled water. In fact, the treatment plant upgrade is not being designed to increase capacity through either the reclaimed water facilities or the ocean discharge facilities but is being designed to increase the level of treatment for the effluent discharge to the ocean. The production capacity of reclaimed water today is 3.3 MGD, of which 10% (0.3 MGD) is needed for operation of the facility thereby leaving a total of 3 MGD of reclaimed water available to the community.

2. The EIR projects, that upon completion of all the proposed long range development the wastewater flows from the University will exceed the 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 repeat the clarification as stated in its earlier comment letter of June 19, 2008, that only one NPDES permit governs capacity issues at the wastewater treatment plant and that permit is held by GSD. Any applications to the RWQCB to modify the operating permit in any way would have to be initiated by GSD. GWSD does not have a permit with the RWQCB for either treatment or discharge of wastewater into the Pacific Ocean.

GSD is four years into the process of upgrading the level of treatment at the wastewater treatment plant with no plans for increasing capacity. The upgraded treatment facility will be

completed and operational by November 2014 with a new NPDES permit such that the permitted capacity (currently at 7.64 MGD) will be modified to equal the design capacity (9.7 MGD). GSD will not be in a position to request increased capacity until the current project is completed due to the potential such a request would have on delaying the progress of the project. A settlement agreement between GSD and the RWQCB contains a conversion schedule detailing project milestones, completion dates and stipulated penalties for failure to complete the project on time.

At some point in the future should UCSB request that GSD ask the RWQCB for an increase in plant capacity, UCSB would be responsible for all costs incurred in the preparation of such application and for the cost of upgrading the treatment plant.

UCSB states that "increasing the NPDES permit capacity will not involve any physical changes that could have a significant effect on the environment". This assumption is incorrect and in fact, the GSD is in the midst of preparing an extensive CEQA document for the current treatment plant upgrading project that includes various environmental mitigation measures.

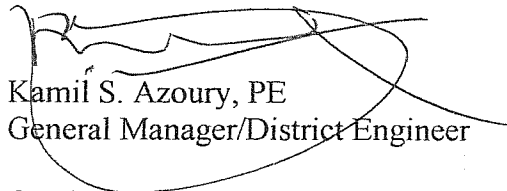
b) The second mitigation measure WW-2B suggests that the University will negotiate the acquisition of additional capacity in the GSD wastewater treatment plant with either GSD or GWSD, both agencies projected to have an excess of capacity at buildout. Table 4.15-5 shows 2008 GSD flow to be 2.54 MGD when the actual flow for 2008 was 2.98 MGD. This slightly higher flow causes the share of WWTP Design Capacity at Buildout for GSD to decrease from 0.51 MGD to 0.07 MGD. GSD does not believe it is prudent to sell any of its remaining capacity and GSD intends to retain and preserve its capacity allocation for the needs of its service area.

3. The first bulleted item under Table 4.15-5 stating that "*... as well as buildout of that portion of the 2008 LRDP that falls within the District*" should be removed because there is no LRDP flow within GSD.

4. UCSB states that there will be excess capacity available for the University to purchase without purchasing GSD's share and that the selling of additional treatment plant capacity is within the responsibility and jurisdiction of another agency. GSD advises the University to review the contract with GSD and the other treatment plant contractual users that addresses transfers and sales of capacity rights.

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