

CALIFORNIA COASTAL COMMISSION

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Hearing Date: 8/8/2000

STAFF REPORT: PUBLIC WORKS PROGRAM

TO: Commissioners and Interested Parties

FROM: Chuck Damm, Senior Deputy Director
Mark H. Capelli, Coastal Program Analyst

RE: SANTA BARBARA CITY COLLEGE PUBLIC WORKS PLAN: Amendment 1-2000. Public Hearing and Final Action at the California Coastal Commission Hearing, August 8, 2000, Waterfront Hilton Beach Resort, Huntington Beach.

Synopsis**Background**

The entire Santa Barbara City College campus lies within the City limits of the City of Santa Barbara which has a fully certified Local Coastal Program. The Commission certified the Public Works Plan for Santa Barbara City College in November 1985, and has amended the plan several times over the last 15 years. The Santa Barbara City College District submitted Public Works Plan Amendment 1-2000 on May 22, 2000. The proposed amendment provides for the remodeling of two educational buildings, the development of 3 new educational buildings, and possibly one parking structure, on the main campus within the City of Santa Barbara. Additionally, the amendment incorporates site specific mitigation measures for the educational buildings, and requires the development of a Traffic Demand Management Plan.

Staff Recommendation:

The staff is recommending denial of the proposed amendment as submitted and approval with suggested modifications which (1) delete the three new educational buildings and the proposed parking structure; (2) require the submittal, approval and implementation of a Traffic Demand Management Plan before new major traffic/parking generating developments may be considered for approval; and (3) modify the proposed Traffic Demand Management Plan policy TDM 1 to specifically include the Commission in the decision to develop a parking structure as part of any plan to accommodate parking demand associated with the development of new educational structures on the Santa Barbara City College campus.

Additional Information

For further information about the amendment, requires this report, or the amendment process, contact Mark H. Capelli at the South Central Coastal area office, 89 South California Street, Ventura, CA 93101 (805) 641-0142.

Exhibits

1. General Location Map
2. General Campus Plan
3. Map of Proposed Campus Developments
4. Preliminary Traffic Demand Management Measures
5. Proposed Mitigation Measures for Campus Development
6. Campus Enrollment: 19914-2009

Standard of Review

The Commission shall certify a Public Works Plan Amendment submitted after the certification of the Local Coastal Programs for the jurisdictions affected by the proposed Public Works Plan only if the Commission finds, after full consultation with the affected local governments, that the proposed Public Works Plan is in conformity with the certified Local Coastal Programs for the jurisdictions affected by the proposed Public Works Plan. (Public Resources Code § 30605.)

Staff Recommendation

I. Denial as Submitted

MOTION: *I move that the Commission certify Santa Barbara City College Public Works Plan Amendment 1-2000 as submitted.*

Staff Recommendation for Denial of Public Works Plan Amendment:

Staff recommends a **NO** vote. Failure of this motion will result in denial of the Public Works Plan Amendment and the adoption of the following resolution and findings. The motion to certify passes only by an affirmative vote of a majority of the appointed Commissioners.

RESOLUTION I:

The Commission hereby denies certification of the Santa Barbara City College Public Works Plan Amendment and adopts the findings stated below on the grounds that the Amendment does not conform with the certified Local Coastal Program for the City of Santa Barbara. Certification of the Amendment would not comply with the California Environmental Quality Act because there are feasible alternatives or feasible mitigation measures or alternatives that would substantially lessen the significant adverse effects that the approval of the Amendment would have on the environment.

II. Certification with Suggested Modifications

MOTION: *I move that the Commission certify Santa Barbara City College Public Works Plan Amendment 1-200 if modified as suggested in the staff report.*

Staff Recommendation for Certification of Public Works Plan Amendment with Suggested Modifications

Staff recommends a **YES** vote. Passage of this motion will result in certification of the Public Works Plan Amendment plan as modified. The motion to certify passes only by affirmative vote of a majority of the appointed Commissioners.

RESOLUTION II:

The Commission hereby certifies the Santa Barbara City College Public Works Plan Amendment, as modified, and adopts the findings stated below on the grounds that the Amendment as modified conforms with the certified City of Santa Barbara Local Coastal Program. Certification of the Amendment, if modified as suggested, complies with the California Environmental Quality Act because feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the Amendment on the environment.

III. Suggested Modifications

1. Modify all texts and exhibits to delete the four new proposed buildings described herein as: New High Technology/Classroom/Office Building; New Multidisciplinary Classroom Building; New General Classroom/Offices Building; and New Parking Structure.
2. Submit for the review and approval of the Commission as a separate Public Works Plan Amendment a Traffic Demand Management Plan (TDMP) within 6 months of certification of Public Works Plan Amendment 1-2000. This TDMP must include performance standards and criteria for evaluating the effectiveness of addressing existing and future parking and traffic demands associated with existing and proposed campus development, including the three new structures proposed as part of Public Works Amendment 1-2000, and for determining if and when a parking structure will need to be constructed as part of any future development on the Santa Barbara City College campus.
3. Modify Policy TDM 1 (part b) to include the Commission in the joint decision, along with the City of Santa Barbara and the Santa Barbara City College, to construct an additional parking structure to meet any residual parking demands following the implementation and evaluation of the Traffic Demand Management Plan.

IV. Findings

A. Background

The Commission certified a Public Works Plan for the Santa Barbara City College in November 1985. In 1987 the Commission certified the Local Coastal Program for the City of Santa Barbara in which the Santa Barbara City College campus is located.

Santa Barbara City College is a fully accredited two-year community college located entirely within the City of Santa Barbara. The 74-acre main campus is sited south of U.S. 101 on a marine terrace overlooking Shoreline Drive, Leadbetter Beach, the Santa Barbara Harbor and the ocean. The main campus entrance is on Cliff Drive (State Route 225) on the College's north boundary. The college is divided into an east and west campus by Loma Alta Drive, a City street running from Shoreline Drive to Cliff Drive. The City's Pershing Park forms the east boundary of the Campus. A former coastal bluff, now inland of Shoreline Drive, forms the south boundary of the campus. Residential areas are located to the west and north of the campus. The Santa Barbara City College enrollment is currently approximately 12,500, and is projected to increase to approximately 15,000 over the next ten years, an increase of 2,500 students. (See Exhibits 2 and 6.)

B. Proposed Amendments

The Santa Barbara Community College District proposes to amend its previously certified Public Works Plan for the Campus to allow for a number of new educational building and remodels which are intended to accommodate expanded curriculum offerings as well as new students. These developments are described below: (See Exhibit 3.)

1) **Life Science/Ecology Building Remodel:** Improvements to Life Science building, located immediately north of the Physical Science building would increase building safety through the removal of asbestos insulation, a seismic/structural upgrade and modernized ventilation system. Existing instructional and faculty space would be remodeled and a 1,500 square foot bathroom area would be added. Minor ground disturbance would occur only for the new bathroom area. Classrooms/labs, faculty and staff would be temporarily relocated during construction activity in 20 temporary buildings on vacant areas within the College campus. Construction would occur over a 17 month period, commencing in 2000.

2) **General Classrooms/Accessibility - Gymnasium Remodel:** This building would be remodeled within the existing building footprint of the East Campus Sports Pavilion, just east of Loma Alta Drive. This remodel would eliminate scheduling conflicts that currently preclude equal access to the gym facilities for women (required as part of Title IX Compliance). Existing bleachers would be replaced by 6,085 square feet of classrooms, and 5,538 square feet in the shower/training area would be remodeled. The facility would also be upgraded to allow for handicapped access. Ground disturbances would be limited to excavation for additional foundation

pilings within the exiting building footprint. Construction would occur over a 14-month period, commencing in 2001.

3) **New High Technology/Classroom/Offices Building:** This new structure on East Campus would house the rapidly growing Multimedia Arts and Technology, Computer-Assisted Design, Journalism, and Information Resources Programs. The center for the alternative /distance learning methodologies would also be located within this building. The building site is currently the paved patio area located east of the Student Services building that is used for graduation exercise. The new facility would alleviate existing pressure on the department that is currently unable to accommodate increased student demands and require additional instruction space. The structure would add 36,000 square feet and include office space, labs, technology and distance learning areas, meeting rooms, a conference room, and gallery space. Construction would occur over a 2-year period, commencing in 2002.

4) **New Multidisciplinary Classrooms:** This new structure will be located southwest of the Garvin Theatre and Drama/Music Building on West Campus. It will consist primarily of classrooms to meet expanding needs of Math, Business, Communications, English, and Fine Arts Programs. The site is currently a landscaped grassy area along a former coastal bluff, no located inland of Shoreline Drive. The building will include 10-12 classrooms/labs (20,492 square feet) with computer technology and faculty associated with the relevant disciplines. Other use of the building would include office space (3,582 square feet), a conference room (330 square feet), and a public gathering area (408 square feet). The first floor of this two-story structure will be below grade, and the building height will be a maximum of 18 feet above existing grade. A setback capable of meeting a 75-year bluff erosion rate will be required. Existing on-site vegetation will be removed. Construction will occur over a 2-year period, commencing in 2003.

5) **New General Classroom/Offices Building:** This new structure of 21,992 square feet will replace existing temporary facilities on the East Campus. It will include classrooms, office space, a meeting room, and study area. The building would meet increase curriculum demands for English as a Second Language and International program languages curricula, and would also provide additional office space for Student Services. Minor grading and site preparation will be required for construction or permanent buildings. Construction would occur over an 18-month period, commencing in 2005.

6) **New Parking Structure:** This building is only to be constructed when the annual parking monitoring project associated with the proposed Traffic Demand Management Plan (TDMP) determines that increasing demand for parking cannot be met through non-structural means. The size (number of parking spaces) of a parking structure and its location will be determined and a design developed, and additional environmental review would be undertaken.

All of the proposed remodels and new developments would be governed by the existing policies of the certified Public Works Plan dealing with natural biological resources, geology and soils, public accessways, archaeological resources, visual resources, transpiration and parking, and public services. (See additional findings below.)

In addition, the proposed amendment includes the following new Transportation Demand Management Plan policy:

TDM 1: To reduce the traffic demands of the Campus, the College will develop a Transportation Demand Management (TDM) plan to address growth over the next 10 years. The plan will include components such as: student transit passes to maximize recent increases in College public transit routes; providing vanpooling incentives; providing incentives for expanding bicycle use; providing emergency transportation services; scheduling varying class times outside of peak parking demand periods; increasing number of internet classes; increasing number of off-campus classes; providing a marketing plan for TDM participation. Design plan with input from participants, and appoint a TDM plan administrator.

The college will initiate discussions with the City and the County of Santa Barbara to jointly participate in the College TDM plan prior to the Coastal Commission certification of the LRDP amendments. The College will prepare the TDM program utilizing input from the City and the County. The college will complete the TDM project prior to providing Notice Impending Development to the Coastal Commission for the first new classroom building. The college may implement some components of the TDM plan (as defined in the Final EIR for the LRDP Amendments, December 1999) prior to the TDM plan finalization. The plan shall include:

- a. TDM plan targets to reduce parking demands at the College, thereby reducing future parking needs.
- b. Construction of an additional parking structure when the City and College Administration jointly determine that residual parking demands, taking into account actual and reasonable anticipated gains from the implementation of TDM programs and new and expanded MTD service, would exceed available supplies. The size would be based on the residual parking demands. A structure location is not currently defined, but could include: Parking Lot 4, on West Campus, Parking Lot 3, on campus at the northwest corner of Loma Alta/Shoreline, and the Pershing Park Lot.
- c. Increasing the number of carpooling parking space to between 15 and 25 percent of the total space on campus based on evaluation of the TDM implementation.

- d. Development of an all-weather bus stop at the West campus if agreed to by MTD.
- e. Measures to enhance transit ridership including considering funding transit-related College improvements off of the main College campus

The College shall conduct, at the appropriate times each year, parking surveys to accurately characterize parking use characteristics as they relate to campus TDM and parking management objectives.

Santa Barbara City College is currently engaged in traffic demand management, and has identified elements of a comprehensive Traffic Demand Management Plan pursuant to this proposed policy, but has not been submitted a formal Traffic Demand Management Plan as part of this Public Works Plan amendment. (See Exhibit 4.)

B. Consistency with Santa Barbara City Local Coastal Program

Land Use

The City of Santa Barbara's Local Coastal Program designates the entire Santa Barbara City College site "Major Public Institutional." All of the physical developments contained in the proposed amendment are located within the bounds of the campus and are consistent with the institutional designation in the City's certified Local Coastal Program. Further all of the proposed remodeled and new building sites are situated within the developed core of the campus and do not require new access roads, extensive site preparation, or infringe upon sensitive coastal resources. (See Exhibit 3.)

Parking and Traffic

The City of Santa Barbara's Local Coastal Program recognized the importance of the City College's operation in the maintenance of adequate public parking availability and traffic capacity along the shoreline in the vicinity of the College and the adjacent Santa Barbara Harbor. Through a joint agreement, the City of Santa Barbara and the College utilize conjunctively the following facilities: Pershing Park, La Playa Field, Los Banos del Mar, Leadbetter Beach Parking Lots and La Playa del Mar Parking Lots.

The City of Santa Barbara's Local Coastal Program contains a number of policies which deal with the management of traffic along the waterfront, including policies which deal with off-street parking to meet peak demands.

Parking

Policy 11.5 of the City's certified LCP provides, in relevant part, that:

All development in the waterfront area . . . shall provide adequate off-street parking to fully meet the peak needs . . .

Parking for Santa Barbara City College is provided in five parking lots on campus and three City lots off-campus (Pershing Park and Leadbetter Beach lots). There are 2,496 parking space available in the lots used by the Campus. Through a lease agreement with Santa Barbara City College, the City's Waterfront Department provides a block of 300 parking spaces in the Leadbetter Beach lots to market to students; the remaining parking spaces in the Leadbetter Beach lots may be used by both the general public and students, but because there is a 90 minute limit on these spaces, they are practically unavailable for student use which requires a generally longer span of time to park, walk to campus, attend classes, and walk back to the lots. To prohibit student parking demand from displacing on-street residential parking in the adjoining neighborhoods, the City has implemented a residential parking permit program: on-street parking is prohibited unless the vehicle has "residential" sticker made available only to residents of the neighborhood.

As noted, the campus parking resources presently consist of 2,496 parking spaces, both on and off-site. Parking demand for the 10-year build-out (1999-2009) is project to increase by 546 spaces over the current demand, thus increasing the peak parking demand to 2,970 spaces, for the projected full-time equivalent student population of 15,136. Parking facilities are generally considered to be fully utilized when occupancies reach 95%. Applying this ratio to the future demand for 2,970 spaces results in a need for 3,126 parking spaces. Thus, there is a potential short-fall of 630 spaces at the end of the 10-year build-out period.

Under this scenario of 630 short-fall parking spaces, campus parking demands could potentially spill over into adjacent waterfront parking facilities and adversely affect public access to the Leadbetter Beach area unless additional parking supplies were provided, or parking demand is reduced. Santa Barbara City College is proposing to address this issue of the short-fall of projected parking spaces by implementing a Transportation Demand Management Plan, and possibly building a new parking facility if the TDM plan is not fully effective.

The proposed amendment includes a specific policy that sets forth the basic elements of this proposal. (See the text of Policy TDM 1 (a)(b)(c)(d) and (e) above. However, the actual elements of the TDM plan have not been fully developed and are not part of this current amendment. As a result, it is not possible to assess the adequacy of the TDM plan or its efficacy in reducing projected parking demand. Consequently, it is not possible to find that the parking demands associated with the three new educational buildings (not including the parking structure) will be adequately met at this time. Before the Commission can find that the parking demands associated with these structures will be met, it must first review and certify the TDM plan itself as part of the Public Works Plan. This TDM plan, which must include performance standards can them be used to assess how well the parking demand associated with the three new educational buildings is met, or whether additional parking facilities must be constructed to meet whatever parking short-fall may exist after development, certification, implementation, and evaluation of the TDM plan.

The Commission therefore finds the three new educational buildings and the proposed parking structure can not be certified at this time because of the uncertainty regarding the College's ability to provide adequate parking for these facilities; only the two remolded

educational buildings which do not involve any substantial increase in traffic or parking demand can be certified at this time. Suggested modification #1 deletes these four structures from the Public Works Plan until such time as the Commission has reviewed, approved, and evaluated the effectiveness of the Traffic Demand Management Plan.

Further, because the current parking facilities at Santa Barbara City College are currently utilized at peak periods to the maximum, and to ensure that parking associated with the three new proposed educational buildings will be adequately met, the Traffic Demand Management Plan called for in Policy TDM 1 must be submitted for review and incorporation into the Santa Barbara City College Public Works Plan as a separate amendment to the Public Works Plan. Suggested Modification #2 requires Santa Barbara City College to submit a Traffic Management Plan amendment to the Commission within six months of the date of the certification of Amendment 1-2000. (See additional findings below.)

Additionally the TDM 1 policy must be modified to expressly include the Commission in the decision to approve the construction of an additional parking structure to meet residual parking demand not met through the implementation of a Traffic Demand Management plan. Suggested Modification #3 expressly includes the Commission, along with the City of Santa Barbara and Santa Barbara City College in the decision to construct an additional parking structure. (See additional findings below.)

Traffic

Policy 11.2 of the City's certified Local Coastal Program provides that:

Until the crosstown freeway corridor is improved, the City shall limit development to that which can be accommodated by a modified local street network which will provide adequate levels of service and access to the Waterfront. The modifications to local streets shall be those which are related to exiting or future potential circulation impacts.

Santa Barbara City College is located north of the Santa Barbara Harbor within the Waterfront area of the City of Santa Barbara. U.S. Highway 101 traverses Santa Barbara and provides regional access to the City College. Cliff Dive, Loma Alta Drive, Shoreline Drive, and Castillo Street provide regional access to the campus parking areas. While the crosstown freeway has been completed (1991), levels of service on both the freeway and local streets are significantly depressed during peak traffic hours, generally morning and evening, and during week-ends.

The projected enrollment increases associated with the proposed developments included in this amendment (principally the three new buildings, but not including the parking structure), over the projected 10-year build-out are expected to generate an additional 5,670 average daily trips, 418 a.m. peak hour trips, and 501 p.m. peak hour trips over the entire area transportation system. All of the surface streets serving the campus are forecast to operate acceptably at Level of Service C or better with the cumulative Public Works Plan 10-year

build-out traffic volumes; this is consistent with the Santa Barbara County Association of Governments Congestion Management Plan standards for roadway operations.

All of the intersections within the project service area are forecast to operate at Level of Service C or better with delays less than 22 seconds during the a.m. and p.m. peak hour periods. Based upon the Congestion Management Plan criteria, the projected 1-year build-out scenario would not exceed the designated level of service at the Congestion Management intersections or the local City's intersections per the City's traffic criteria.

However, U.S. 101 currently operates at Level of Service D from Castillo to Carillo during peak hour periods and Level of Service D-E west of Carillo. The 10-year build out associated with the proposed amendment would add 134 a.m. peak hour trips, and 161 p.m. peak hour trips to U.S. 101 west of Castillo and 83 a.m. peak hour and 99 p.m. peak hour trips to U.S. 101 west of Castillo. According to the Congestion Management Plan criteria for roadway operations, this level of increase, without Traffic Demand Management Measures, would exceed the designated level of service.

As noted above, the proposed amendment includes a specific policy that sets for the basic elements of this proposal. (See the text of Policy TDM 1 (a)(b)(c)(d) and (e) above. However, the actual elements of the TDM plan are not part of this current amendment. As a result, it is not possible to assess the adequacy of the TDM plan or its efficacy in reducing projected vehicular traffic. Consequently, it is not possible to find that the traffic associated with the three new educational buildings (not including the parking structure) will be adequately met at this time. Before the Commission can find that the traffic associated with these structures will be met, it must first review and certify the TDM itself as part of the Public Works Plan. This TDM, which must include performance standards can then be used to assess how well the traffic demand associated with the three new educational buildings can be met after development, certification, implementation, and evaluation of the TDM.

The Commission therefore finds that only the two remolded educational buildings and the Policy TDM 1 (a)(b)(c)(d) and (e) can be certified at this time, and the three new educational buildings and related parking structure proposal must be denied, pending the development, certification, implementation, and evaluation of the effectiveness of the TDM Plan. Suggested modification #1 deletes the three new educational buildings and related parking structure proposal.

Further, because the current traffic generated by Santa Barbara City College reduces the level of service on U.S. 101 at peak periods, and to ensure that traffic associated with the three new proposed educational buildings will be adequately accommodated, the Traffic Demand Management Plan called for in Policy TDM 1 must be submitted for review and incorporation into the Santa Barbara City College Public Works Plan as a separate amendment to the Public Works Plan. Suggested Modification #2 requires Santa Barbara City College to submit a Traffic Management Plan amendment to the Commission within six months of the date of the certification of Amendment 1-2000.

The Commission therefore find the proposed amendment as modified, would be consistent with the and adequate to carry out the parking and traffic policies of the City of Santa Barbara's certified Local Coastal Program.

Water and Sewer Services

Water

The City of Santa Barbara supplies water to the Santa Barbara City College campus. While the City's certified Local Coastal Program has no specific policies governing water supplies, it does incorporate the language of Public Resources Code Section 30254 which provides, in part, that:

Where existing or planned public works facilities can accommodate only a limited amount of new development, services to coastal dependent land use, essential public services and basic industries vital to the economic health of the region, state, or nation, public recreation, commercial recreation, and visitor-serving land uses shall not be precluded by other development.

Annual water consumption has been shown to be a function of the number of persons (students, faculty, staff) utilizing the campus, rather than the addition of square feet of building space. As a result of an aggressive water conservation program, including retrofitting and use of drought tolerant landscaping, and the use of reclaimed water for irrigation, Santa Barbara County has consistently reduced its per-capita water use. During the projected 10 year build-out period (1999-2009) water use on the Santa Barbara City College campus would increase 19 acre feet (or 23%) over current consumption to a total of 102 acre feet per year. This represents about 0.6% of the City total water demands. The College currently consumes approximately 0.5% of the City water supply, and the projected increase of 0.1% would not increase the City's water demands beyond available supplies, or preclude other priority water consuming uses within the City's portion of the Coastal Zone.

Sewer Services

The City of Santa Barbara currently provides sewer services to Santa Barbara City College through the El Estero Wastewater Treatment Plan. This plant has a current capacity to treat 11 million gallons per day. The current inflow to the plant ranges between 7 and 8 million gallons per day (not including peak storm flows). Currently, the Santa Barbara City College produces approximately 182,910 gallon of sewage per day. The 10-year build out for Santa Barbara City Colleges is projected to result in a 22% increase, or 222,970 gallons per day. Given the El Estero Wastewater Treatment Plants 11 million gallon capacity and current inflow of between 7 and 8 million gallons per day, there is adequate sewer service capacity to projected and proposed campus demands.

The Commission therefore finds the proposed amendment as modified, would be consistent with the and adequate to carry out the water supply and sewer service policies of the City of Santa Barbara's certified Local Coastal Program.

Coastal Resources

The Santa Barbara City College campus has three areas of environmentally sensitive habitat: Oak Scrub Woodland on the cliff face above Pershing Park adjacent to the East Campus; Oak Woodland and Riparian habitat on Arroyo Honda in the northern and eastern end of the West Campus; and Coastal Bluff Scrub habitat on the bluff face on West Campus. All three of these areas contain native plant species which are representative of the individual plant communities.

The City of Santa Barbara's certified Local Coastal Program does not include any specific policies regarding habitat protection on the Santa Barbara City College campus, but does contain two general policies applicable to the protection of upland and creek habitats within the City.

Policy 6.1 provides that:

The City through ordinance, resolution, and development controls shall protect, preserve, and where feasible restore the biotic communities designated in the City's conservation Element of the General Plan and any future annexations to the City consistent with the PRC Section 30240.

Policy 6.8 regarding creek environments, provides that:

The riparian resources, biological productivity, and water quality of the City's coastal zone creeks shall be maintained, preserved, and enhanced and where feasible, restored.

The physical development associated with the proposed remodel and new buildings will be located in already developed portions of the campus, and will not encroach upon or be placed within 50 feet of the Arroyo Honda, Oak and Riparian habitats (as required by existing resource protection policies of the Public Works Plan. As noted above the certified Public Works Plan for Santa Barbara City College contains a number of policies and programs for the protection and restoration of the campuses sensitive coastal resources, including environmentally sensitive habits. All of the proposed developments (with the exception of the parking facility whose need, location and design, has not been determined) are consistent with these policies.

Additionally, a suite of building and site specific mitigation measures have been identified through an EIR prepared for the proposed amendment which would supplement the policy requirements of the certified Santa Barbara City College Public Works Program. (See Exhibit 6.) However, it should be noted, that while the two remodeled building allowed under this amendment will not contribute significantly to polluted run-off from the campus,

the development of the proposed three new educational buildings could significantly contribute, either individually or cumulatively, to the polluted run-off from the campus, and this issue must be addressed as part of any separate amendment for these or other new buildings (or other impermeable surfaces) on the campus.

The Commission therefore finds the proposed amendment as modified, would be consistent with the and adequate to carry out the coastal resource protection policies of the City of Santa Barbara's certified Local Coastal Program.

Coastal Access

The City of Santa Barbara's certified Local Coastal Program contains numerous general policies providing for the protection of and provision of coastal access (e.g. Policy 2.1, 2.3, 2.4, and 2.5). These policies mirror those contained in the California Coastal Act. While the City's Local Coastal Program does not contain any access policies which pertain specifically to the Santa Barbara City College, Policy 2.1 provides, in part, that:

Public access in the coastal buff area of the City shall be maximized constant with the portion of natural resources, public safety, and private property rights.

The proposed amendment includes the addition of three new structures which have the potential to generate significant additional traffic and parking demands which would adversely affect the public use of the adjacent public beaches by increasing traffic congestion and displacing public beach parking spaces.

As previously noted, the proposed amendment includes a specific policy that requires the development of Traffic Demand Management Plan. (See the text of Policy TDM 1 (a)(b)(c)(d) and (e) above.) However, the actual elements of the TDM plan are not part of this current amendment. As a result, it is not possible to assess the adequacy of the TDM plan or its efficacy in reducing existing or projected vehicular traffic or parking demands. Consequently, it is not possible to find that the traffic and parking associated with the three new educational buildings (not including the parking structure) will be adequately met at this time. Before the Commission can find that the traffic associated with these structures will be met, it must first review and certify the TDM itself as part of the Public Works Plan. This TDM, which must include performance standards can then be used to assess how well the traffic demand associated with the three new educational buildings can be met after development, certification, implementation, and evaluation of the TDM.

The Commission therefore finds that only the two remolded educational buildings and the Policy TDM 1 (a)(b)(c)(d) and (e) can be certified at this time, and the three new educational buildings must be denied, pending the development, certification, implementation, and evaluation of the effectiveness of the TDM Plan. Suggested modification #1 deletes the three new educational buildings and related parking structure proposal.

Further, because the current traffic generated by Santa Barbara City College reduces the level of service on U.S. 101 at peak periods, and to ensure that traffic associated with the three

new proposed educational buildings will be adequately accommodated, the Traffic Demand Management Plan called for in Policy TDM 1 must be submitted for review and incorporation into the Santa Barbara City College Public Works Plan as a separate amendment to the Public Works Plan. Suggested Modification #2 requires Santa Barbara City College to submit a Traffic Management Plan amendment to the Commission within six months of the date of the certification of Amendment 1-2000.

The Commission therefore finds the proposed amendment as modified, would be consistent with the and adequate to carry out the public access policies of the City of Santa Barbara's certified Local Coastal Program.

C. PWP/CEQA

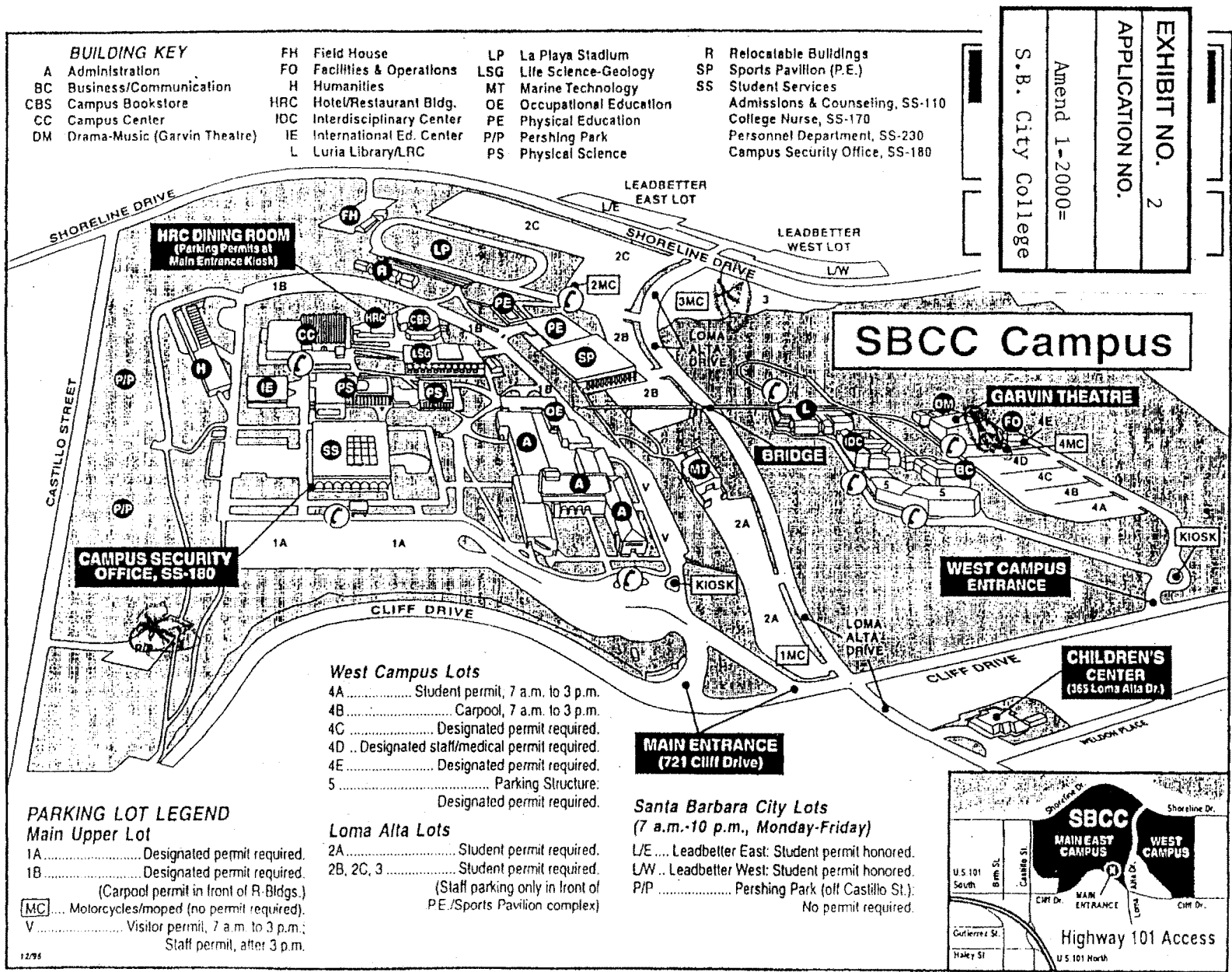
The proposed amendment is to the Santa Barbara City College Public Works Plan, which the Commission certified the Public Works Plan in 1985.

The Coastal Commission Public Works Program process has been designated at the functional equivalent of the CEQA. CEQA requires the consideration of the least environmentally damaging feasible alternatives and the consideration of mitigation measures to lessen significant environmental impacts to the level of insignificance. As discussed in the findings above, Public Work Plan Amendment 1-2000, as modified is consistent with the applicable policies of the of the City of Santa Barbara's certified Local Coastal Program, and would reduce impacts to the environment to the maximum extent feasible.

The amendment, as modified thorough suggested medications, is therefore consistent with the provisions of hte the Environmental Quality Act and the City of Santa Barbara's certified Local Coastal Program.

MHC

Figure A-1 - Map of Existing Facilities - Page 61



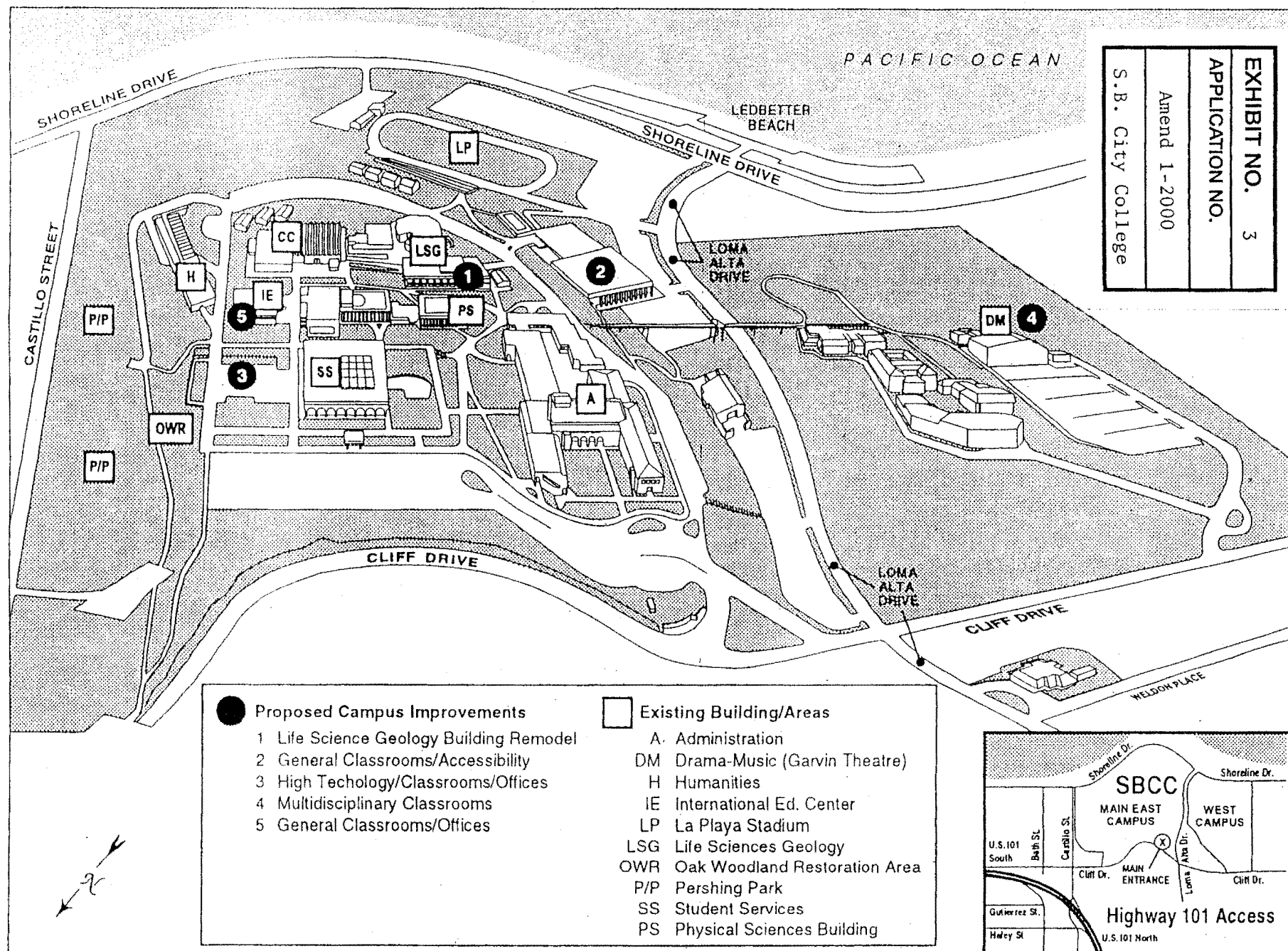


Figure 2-2. SBCC Main Campus, Proposed Improvements

Table 5.2-5
SBCC Parking Supply and Demand Forecasts - LRDP 10-Year
Buildout Operations

10-Year Demand ^a	Required Spaces (95%)	Existing Supply	Shortfall
2,970 Vehicles	3,126 Spaces	2,496 Spaces	630 Spaces

a. Parking demands for 11:00 A.M. peak hour period.

Mitigations

LRDP 10-Year buildout would exceed standards for roadway operations. U.S. 101 currently operates at LOS D from Castillo to Carrillo during the peak hour periods and LOS D-E west of Carrillo. From Castillo to Milpas (and east of Milpas) the freeway operates at LOS F during peak hour periods. Caltrans is administering a program to provide operational improvements for the freeway (a ±\$50,000,000 program). However, these improvements would not provide an acceptable level of service. A deficiency plan, administered by SBCAG, is being developed to address the long-range improvements for the freeway. The following LRDP Amendments are proposed to address transportation impacts on roadway operations:

- TR-1: Develop a College Transportation Demand Management (TDM) Plan to address growth over the next 10 years and to reduce impacts to U.S. Highway 101 including components such as: increase number of carpool spaces to between 15 and 25% of the total spaces on campus, based on evaluation of the TDM implementation; develop an all-weather bus stop at the campus if agreed to by the MTD; provide transit passes to maximize recent increases in College public transit routes; measures to enhance transit ridership including considering funding transit related College improvements off of the main College campus; provide vanpooling incentives; provide incentives for expanding bicycle use; provide emergency transportation services; schedule varying class times outside of peak parking demand periods; increase number of Internet classes; increase number of off-campus classes. Provide a marketing plan for TDM participation. Design the TDM Plan with input from participants, and appoint a TDM Plan administrator.
- TR-2: Include in the SBCC TDM Plan targets to reduce campus parking demands, thereby reducing future parking needs.

Details of the TDM Plan are discussed below.

Potential Parking Impacts. The existing 2,496 parking spaces available in the parking lots designated for campus use are fully occupied (95% occupied during peak periods). There is a potential shortfall of 630 spaces for LRDP 10-year buildout Operations. The following LRDP Amendment is proposed in the event that the SBCC TDM Plan is not capable of addressing impacts associated with 10-year buildout parking.

- TR-3: Construct an additional parking structure when the City of Santa Barbara and the College Administration jointly determine that residual parking demands, taking into account the actual and reasonably anticipated gains from the implementation of TDM programs and

new and expanded MTD service, would exceed available supplies. A structure is not currently defined, but could include: Parking Lot 4, on West Campus; Parking Lot 3, on campus at the northwest corner of Loma Alta Drive/Shoreline Drive; and the Pershing Park Lot. A potential structure location would be subject to a subsequent review under CEQA when the City of Santa Barbara and the College determine that existing parking facilities and TDM Plan programs are inadequate to provide for projected demand.

This mitigation would be subject to a subsequent CEQA analysis and is not an element of the proposed project. The location, size, and design of the structure would be determined when the City and College Administration jointly determine that residual parking demands, taking into account the actual and reasonably anticipated gains from the implementation of TDM programs and new and expanded MTD service, would exceed available supplies. Construction of a parking garage would begin with sufficient lead time to have it completed in time to meet the anticipated demands.

Transportation Demand Management Plan

TDM Plans are designed to reduce traffic and parking generation. TDM Plan strategies include means to increase vehicle occupancy, promote transit use, encourage use of alternate modes of transportation such as biking and walking, and varying work or class schedules and/or locations to reduce trips, particularly during peak hours. SBCC has successfully implemented a number of TDM Plan measures, including dedicated carpool parking spaces and provision of bus passes to students each semester at registration. Increasing parking fees to reduce parking demands was not included as a measure in the TDM Plan because of legal limitations on fees for students and staff. A discussion of additional TDM Plan measures which could be implemented to reduce future traffic and parking demands associated with student and staff growth are discussed below.

Existing Travel Pattern

The successful implementation of TDM Plan strategies involves changing people's travel patterns. In order to facilitate these changes, it is important to understand why people choose their current mode of travel. Factors affecting modal choice include the convenience, availability and cost of a given mode, and personal schedules.

The student surveys found that 63% drove alone to campus and 19% arrived in carpools. Bus passes are provided at registration and 9% of the students indicated that they traveled to campus via MTD buses. A combined total of 8% either walked or rode a bicycle.

Students that drove alone indicated that they chose that mode of transportation primarily because of the need to travel between campus and a job site. The second most common reason for choosing to drive alone was because they wanted a car available for errands and emergencies. Students that provided these responses are less likely to participate in transit or carpool programs. Other reasons provided for driving alone were that transit service was not convenient near the respondent's home (16%) or they could not find someone to carpool with (13%). These people would be more likely to participate in transit or carpool programs if these issues were addressed.

The staff surveys found that the majority of staff drove alone to campus (86%) and that 6% participated in carpools. The remaining staff either rode the bus (2%), biked (3%) or walked (3%).

Staff that drove alone indicated that they choose that mode of transportation primarily because of the need to drop someone off on the way to the campus (37%). Staff that provided this response are less likely to participate in transit or carpool programs. The second most common reason for choosing to drive alone was wanting a car available for errands and emergencies (35%). The surveys further showed that 83% of the staff do not typically leave the campus during the day. Other reasons provided for driving alone were that transit service was not convenient near the respondent's homes (17%) or they could not find someone to carpool with (3%). These staff would be more likely to participate in transit or carpool programs if these issues were addressed.

The surveys also indicated that 25% of the students and faculty live in areas adjacent to the campus, and that 96% live in an area served by the MTD.

Carpooling

Increasing carpools is a feasible option for the College. The average carpool occupancy was recorded to be 2.5 persons per vehicle, based on SBCC survey results. This is also the average carpool size for the South Coast area. Applying this vehicle occupancy, trip generation would be reduced by 2 to 3 daily trips for every new carpool and parking demands would be reduced by 1 to 2 cars. A total of 19% of the students and 5% of the staff surveyed currently arrive on campus in carpools.

The campus currently offers 219 reserved carpool parking spaces for students in Lots 1A, 4B and 4C. The parking occupancy surveys found that these spaces were fully utilized during peak periods (98% at 11:00 A.M.). An additional 22 carpool parking spaces are reserved for staff in Lot 4D. These spaces were also fully utilized during peak periods (100% at 11:00 A.M.).

Carpooling can be further encouraged by developing a database of students and staff members interested in carpooling by residential location and class/work schedule to match potential carpool participants. This could be accomplished by creating a centralized ridesharing office on campus (see further discussion under Marketing). Additionally, the number of carpool spaces in relation to non-carpool spaces could be increased incrementally to between 15 to 25 percent of all campus spaces to ensure that all carpools will have either a preferential space or an available space during peak parking demand times. Other financial incentives for carpooling (e.g., reduced parking fees) could also be offered to faculty and staff in conjunction with expanded staff carpool spaces in the main campus lots.

Public Transit

The campus is currently served by several bus stops on Cliff Drive and Loma Alta Drive. The use of transit facilities by students is encouraged by providing bus passes for students each semester at registration. MTD Lines 5, 7, 15, 16, and 17 provide connections between the campus and destinations throughout the Santa Barbara-Goleta area, including the Downtown Transit Center. The survey results indicate that 9% of students currently travel to and from campus on buses, while 2% of staff use transit.

The recently adopted South Coast Transit Plan calls for revisions to existing transit services as well as development of new transit services that will significantly improve access to the SBCC campus

(*South Coast Transit Plan*, Santa Barbara Metropolitan Transit District, May 1998). The primary components of the plan which would affect service to the College are outlined below:

- Boost service on Line 7 - Isla Vista/City College Express.
- Increase frequency of Line 5 - Mesa/La Cumbre Route.
- Link Line 16 - City College Route - to future trunk and express service on Anacapa Street in the Downtown-area.
- Create Mesa Loop Route to improve travel to and from Mesa area, Downtown and City College.
- Create Westside/La Cumbre Route to provide direct service from City College, the Westside and Cottage Hospital, to upper State Street and La Cumbre Plaza.

Implementation of these transit improvements will significantly increase service to the Mesa area and the SBCC campus. Given that 16% to 17% of the students and staff who responded to the transportation survey indicated that they drive to the campus because transit was not convenient, it is anticipated that the improved transit service will result in increased ridership to the College. The College should continue to actively promote transit use by posting updated bus schedule and route information at locations available to students, faculty and staff. The College could also encourage increased use of transit by faculty and staff through the provisions of subsidized transit passes or other financial incentives (e.g., regular paycheck disbursements for all participants). Developing an all-weather bus stop shelter at the campus would enhance the environment of riders waiting for a bus and encourage ridership. Other funding improvements on College property would also increase bus ridership.

Vanpooling

Vanpooling is another potential means of reducing vehicle trips and parking demand. The College could buy several vans and make them available to staff who would drive on a rotating basis within their pool. Financial incentives (e.g., subsidizing gasoline costs and van maintenance; or regular paycheck disbursements for all participants) could be provided to vanpooling participants.

Bicycling

The SBCC campus is located convenient to existing bike routes on Shoreline Drive and the southern portion of Loma Alta Drive accessing the campus. Bicycle parking areas are also provided on campus. Existing bicycle ridership by students and staff is 2% to 3%.

The recently adopted City of Santa Barbara Bicycle Master Plan contains several policy and bike path improvements which will promote and enhance bike access to the College (*Bicycle Master Plan*, City of Santa Barbara, October 1998). The primary components of the plan directly related to improving bicycle access to the College are outlined below:

Policy 1.2.2: Continue to work with Santa Barbara City College to reduce the number of drive alone trips and the demand for parking through such programs as:

- Educational information about the benefits of cycling; and

- Bicycle facilities such as bike lanes and bike storage systems.

Policy 1.2.6: Promote the use of bicycles on public transit and trains.

Strategy 2.1.14: Increase bicycle access between the Westside, Eastside, and Downtown through such methods as:

- Creating bicycle lanes between Rancheria Street and the Harbor (City College) area;
- Improving existing bicycle lanes to connect Shoreline Park to Leadbetter Beach along Shoreline Drive;
- Creating access to the Waterfront from a Cacique Street undercrossing at Highway 101; and
- Creating a crosstown bicycle route between Lower Westside and Lower Eastside.

Implementation of these strategies by the City, combined with additional improvements by the College such as enhanced on-campus bicycle circulation and parking facilities, will promote bicycle use by existing and future SBCC students and staff. Other financial incentives (e.g., regular paycheck disbursements for all faculty and staff participants) could also be used in conjunction with this program.

Emergency Transportation Services

Many of the staff respondents to the transportation survey indicated that they drove alone to the College because they wanted a car available for errands and emergencies. The surveys also indicated that 83% of the staff do not typically leave the campus during the day. Given these survey responses, it is recommended that the College consider establishing a guaranteed ride home program for faculty and staff who choose to use alternative transportation modes for their commute. In the event that an emergency or work requirement interferes with a staff member's normal alternative transportation arrangement, SBCC could assist in providing an alternative means to guarantee a free ride home. These services could include subsidized taxi rides, provision of a shuttle service, etc.

Varying Class Times

Survey results indicated that 28% of students either arrive at or leave campus during the A.M. peak travel hours. 27% either arrive at or leave campus during the P.M. peak travel hours. Implementing alternative class schedules could reduce the number of student commute trips in the morning and afternoon peak hours and could reduce the need for additional parking spaces if classes are shifted to times of off-peak parking demand.

Internet Classes

A relatively new concept, classes can be provided via the Internet, thus eliminating or reducing the daily home-to-school and school-to-home trip. With recent advances in telecommunications, students are now able to attend SBCC classes on-line via their personal computer. Depending on the class structure, some students would attend class on campus periodically and some would not travel to the campus at all.

Off-Campus Classes

SBCC is proposing to increase the number of off-campus classes. These would be located in areas more convenient to students and would reduce trip distances. Additionally, many of these classes may be offered during off-peak traffic periods such as in the evenings. These measures would reduce the need for additional parking spaces on campus and could reduce the number of peak hour trips in the vicinity of the campus.

Marketing

A strong marketing program increases the success of a TDM measures. Transportation Demand Management programs require that a substantial portion of a targeted population change their travel behavior. The marketing plan must be aimed at changing popular beliefs concerning travel or the plan's success will be limited. The marketing strategy can be divided into the following elements:

1. Identify the various methods and alternatives by which traffic can be reduced (carpooling, vanpooling, alternative work hours, class schedules).
2. Identify the program costs and the benefits to users.
3. Identify incentives that will promote participation in the program.
4. Identify means for effective advertising and promotion of the program (newsletters, announcements, rideshare center, posters and flyers, awareness programs, etc.).

The College should bring potential participants into the design of the TDM Plan. This could include conducting additional student surveys to determine which strategies would be most effective. The registration process would be an ideal medium to collect and disseminate information. The College should also appoint a TDM Plan administrator.

SBCC would be responsible developing and implementing the exact marketing scheme for the campus.

TDM Plan Effectiveness

The estimated mode shifting which would result from implementing the TDM strategies described above are presented in Table 5.2-6. The analysis indicated that, based on conservative assumptions, a 7% reduction of traffic and parking generation can be achieved. These reductions would reduce peak hour traffic added to the surface streets and freeway, as well as peak parking demands.

The totals shown in the table indicate that an effective TDM Plan implemented by SBCC could shift 7% of student and 5% of staff from drive-along vehicles. Applying these shifts to the total future students and staff would result in a net decrease of 2,107 ADT, 154 A.M. PHT and 187 P.M. PHT generated at the College, which is about 7% of the total traffic at the campus and about 37% of the net new traffic which is expected in the 10-Year scenario.

These savings would reduce College peak hour traffic additions to U.S. 101 west of Carrillo Street by 49 A.M. PHT and 60 P.M. PHT. The peak hour traffic additions to U.S. 101 east of Carrillo Street would be reduced by 39 A.M. PHT and 47 P.M. PHT.

Table 5.2-6 Trip Generation and Parking Reductions with TDM Plan		
Mode Choice	Existing Mode Split	TDM Plan Mode Split
Students		
Carpool/Vanpool	20%	22%
Transit	9%	13%
Bicycle/Walk	8%	9%
SOV	63%	56%
Total	100%	100%
Staff		
Carpool	6%	8%
Transit	2%	4%
Bicycle/Walk	6%	7%
SOV	86%	81%
Total	100%	100%

Additional Parking Spaces

As reviewed above, implementing the above TDM strategies at the campus, in concert with transit and bicycle improvements proposed by MTD and the City, will reduce existing and future parking generation at SBCC. The mode shifting forecasts shown in Table 11 would reduce the peak peaking demand by 215 spaces. Even with the plan, however, additional parking spaces will be required to accommodate future growth. It is estimated that 400 to 450 new spaces will be required to meet the 10-Year parking demands generated by the College even with a successful TDM Plan (630 space demand with TDM - 215 space TDM savings = 415 spaces).

Monitoring

The College currently conducts a detailed traffic and parking monitoring program in February of each year. The program includes traffic counts at the Main Campus and West Campus entrances. The College also conducts parking surveys to determine occupancy levels in the campus and City parking lots which serve SBCC. The traffic and parking survey data is reviewed by the College and submitted to the City each year. It is recommended that the College continue the traffic and parking monitoring program to assess the effects of the TDM and parking expansion programs and determine timing of the parking expansion requirements.

Residual Impacts. Implementation of the TDM Plan to reduce traffic generation at the College and construction of a new parking structure on the campus would reduce impacts. Impacts would be less than significant (Class II).

**Table 1-1
Summary of Impacts and Mitigations**

<i>Resource</i>	<i>Description of Impact</i>	<i>Mitigation</i>	<i>Residual Impact</i>
LRDP IMPROVEMENT PROJECTS			
Life Science Geology (Existing Remodel)			
Air Quality	Combustive emissions due to heavy equipment usage have been included in the 1998 CAP and are not expected to contribute to the County O3 nonattainment status. Grading for the 1,500 GSF bathroom area would produce minimal amounts of fugitive dust (PM10) emissions.	None required.	Less than significant (Class III).
	Removal of insulation containing asbestos during renovation activities would pose a potentially significant public health threat.	Compliance with APCD Rule 1001, measures for the control of asbestos emissions (National Emissions Standards for Hazardous Air Pollutants, Subpart M).	Less than significant (Class II).
Archaeological Resources	The proposed remodel would result in minimal ground disturbance within the College's LRDP Archaeological Element low sensitivity area.	None required.	Less than significant (Class III).
Geologic Processes	Minor ground disturbances for the 1,500 GSF bathroom have less than significant erosional impacts. All other improvements would take place within the existing structure.	None required	Less than significant (Class III).
Noise	Construction would not elevate noise levels above the existing 60 dBA currently experienced by off-site receptors.	None required.	Less than significant (Class III).
Transportation and Parking	Short-term increases in employee traffic, truck trips, and heavy equipment trips from construction activity could cause short-term impacts to the campus parking and circulation system, as well as the adjacent street network.	TR-1: Incorporate the following measures during construction activity: a. Schedule a construction conference prior to the beginning of construction projects to discuss measures to reduce potential construction related impacts. Representatives from the building contractor, SBCC and the City will be present. b. Route construction traffic to minimize trips through the surrounding residential neighborhoods and on campus.	Less than significant (Class II).
<i>Notes:</i> Class I Significant, unavoidable Class II Significant, but reasonably mitigated Class III Adverse, but less than significant			

EXHIBIT NO. 5
APPLICATION NO.
Amend 1-2900
S.B. City College

**Table 1-1
Summary of Impacts and Mitigations**

<i>Resource</i>	<i>Description of Impact</i>	<i>Mitigation</i>	<i>Residual Impact</i>
LRDP IMPROVEMENT PROJECTS			
Life Science Geology (Existing Remodel)			
Transportation and Parking (cont.)	See previous page.	<p>c. Avoid scheduling of construction truck trips during morning and evening peak hours (7:00 A.M. to 9:00 A.M. and 4:00 P.M. to 6:00 P.M.) to minimize impacts during commute periods.</p> <p>d. Prohibit construction on Saturday, Sunday, holidays and between the hours of 5:00 P.M. and 7:00 A.M.</p> <p>e. Develop a parking plan to provide alternative parking for periods when campus parking facilities are affected by construction activity. The plan shall include parking needs for students, staff, and construction workers</p>	Less than significant (Class II).
Visual Resources	Improvements to this building would be limited to the interior of the structure and would have no effect on existing visual resources. Some construction activities could be visible from the harbor area. Construction would not obstruct any important public view corridors.	None required.	Less than significant (Class III).
General Classrooms/Accessibility - Gymnasium (Existing Remodel)			
Air Quality	Impacts would mainly occur from combustive emissions due to heavy equipment usage. Construction emissions from land use development projects have been included in the 1998 CAP and are not expected to contribute to the County O3 nonattainment status. Earth moving would produce minimal amounts of fugitive dust (PM10) emissions, as this activity would be enclosed within the existing building structure.	None required.	Less than significant (Class III).
Archaeological Resources	Remodeling would occur within the existing building footprint and all excavations would be within previously disturbed soils such that the potential to encounter intact archaeological deposits is very unlikely.	None required.	Less than significant (Class III).
<i>Notes:</i> Class I Significant, unavoidable Class II Significant, but reasonably mitigated Class III Adverse, but less than significant			

**Table 1-1
Summary of Impacts and Mitigations**

<i>Resource</i>	<i>Description of Impact</i>	<i>Mitigation</i>	<i>Residual Impact</i>
LRDP IMPROVEMENT PROJECTS			
General Classrooms/Accessibility - Gymnasium (Existing Remodel)			
Geologic Processes	Existing geologic features would not be altered. No increased exposure of soils to wind and water erosion, nor increase in impervious surfaces, would result. The interior remodel would not affect the existing structural integrity of the building.	None required.	Less than significant (Class III).
Noise	Noise could reach a maximum of 58 dBA at the closest sensitive receptors located 800 feet away. Noise would not exceed significance thresholds during the 11-month construction period.	None required.	Less than significant (Class III).
Transportation and Parking	Short-term increases in employee traffic, truck trips, and heavy equipment trips from construction activity could cause short-term impacts to the campus parking and circulation system, as well as the adjacent street network.	TR-1: Implement a construction traffic management plan, as described for the Life Science Geology Remodel.	Less than significant (Class II)
Visual Resources	Most improvements would be to the structure's interior and would have no affect on visual resources. Construction activities would affect only a small portion of nearby public views, and would insignificantly degrade the aesthetic quality of this building as experienced from public view corridors.	None required	Less than significant (Class III).
High Technology/Classrooms/Offices (New Building)			
Air Quality	<p>Earth moving activities associated with construction would generate combustive emissions (including ozone precursors) from heavy-duty grading equipment and fugitive dust (PM₁₀) from ground disturbances and would contribute to the County's nonattainment status.</p> <p>Fugitive dust emissions would have the potential to cause a public nuisance and/or exacerbate the County's PM₁₀ nonattainment status.</p> <p>Combustive emissions from construction activities are relatively small compared to total emissions.</p>	<p>AQ-2 Incorporate dust control measures during construction, as follows:</p> <ul style="list-style-type: none"> a. Use water trucks or sprinkler systems during construction to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, wet down such areas in the later morning and after work is completed for the day. Increase the watering frequency when wind speeds exceed 15 miles per hour. Use reclaimed water whenever possible. b. Install gravel pads at all access points to prevent tracking of mud onto public roads. 	Less than significant (Class II).
<p><i>Notes:</i> Class I Significant, unavoidable Class II Significant, but reasonably mitigated Class III Adverse, but less than significant</p>			

Table 1-1
Summary of Impacts and Mitigations

<i>Resource</i>	<i>Description of Impact</i>	<i>Mitigation</i>	<i>Residual Impact</i>
LRDP IMPROVEMENT PROJECTS			
High Technology/Classrooms/Offices (New Building)			
Air Quality (cont.)	See previous page.	<ul style="list-style-type: none"> c. If importation, exportation, or stockpiling of fill is involved, cover soil stockpiled for more than two days, and keep moist, or treat with soil binders to prevent dust generation. Cover trucks transporting fill material to and from the site from the point of origin. d. After clearing, grading, earth moving, or excavation is completed, treat the disturbed area by watering, revegetating, or by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur. e. Designate a person or persons by the contractor or builder to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust off-site. Include holiday and weekend periods in their duties when work may not be in progress. Provide the name and telephone number of such persons to the Air Control District prior to land use clearance for map recordation and land use clearance for finish grading for the structure. f. Include as a note on a separate informational sheet to be recorded with the map all of the above dust control requirements prior to land use clearance. Show all requirements on grading and building plans. 	Less than significant (Class II).
Archaeological Resources	The project location is within the College's LRDP Archaeological Element low sensitivity area. There is a minimal potential for impacting archaeological resources during grading.	AR-1: In the event that unexpected cultural resources are encountered during grading, temporarily redirect construction until a City-qualified archaeologist can evaluate the significance of the find. If resources are of Native American origin, consult local tribal representatives.	Less than significant (Class III).
<i>Notes:</i> Class I Significant, unavoidable Class II Significant, but reasonably mitigated Class III Adverse, but less than significant			

Table 1-1
Summary of Impacts and Mitigations

<i>Resource</i>	<i>Description of Impact</i>	<i>Mitigation</i>	<i>Residual Impact</i>
LRDP IMPROVEMENT PROJECTS			
High Technology/Classrooms/Offices (New Building)			
Geologic Processes	<p>Removal of the existing concrete and site preparation for building construction would temporarily increase the amount of soil exposed to wind and water erosion.</p> <p>Replacing paved patio with a building would not substantially incrementally increase the amount of impervious surfaces on campus, or to increased runoff.</p> <p>Seismic activity from nearby or regional faults could produce severe ground motion on the Campus. Ground motion could result in structural damage and loss of use of buildings.</p>	<p>LRDP Policy 2.1(a): If construction is to occur over the rainy season, identify temporary erosion control measures to minimize erosion of and from the site.</p> <p>LRDP Policy 2.1(b): Include the provision of positive drainage systems following natural drainage patterns of the campus in post-construction maintenance.</p> <p>GEO-1: Incorporate silt traps in all drainage system grates. Develop a maintenance plan to regularly clean these traps. Ensure that no vegetation cuttings or cleaning chemicals are placed in the drains.</p> <p>LRDP Policy 2.1(c): Design projects to sustain impacts and minimize damage to life and property.</p> <p>GEO-2: Direct all drainage system flow away from the mesa bluffs to avoid bluff erosion.</p>	<p>Less than significant (Class II).</p> <p>Less than significant (Class II).</p>
Noise	At Pershing Park, noise levels would reach approximately 70 dBA during construction. At McKinley School and residences north of Cliff Drive and west of Loma Alta Drive, construction noise would be up to 70 dBA during the 1.5 year period.	N-1: Limit construction activity and equipment maintenance to the hours between 7:00 A.M. and 5:00 P.M., Monday through Friday.	Less than significant (Class II).
Transportation and Parking	Short-term increases in employee traffic, truck trips, and heavy equipment trips from construction activity could cause short-term impacts to the campus parking and circulation system, as well as the adjacent street network.	TR-1: Implement a construction traffic management plan, as described for the Life Science Geology Remodel.	Less than significant (Class II)
Notes: Class I Significant, unavoidable Class II Significant, but reasonably mitigated Class III Adverse, but less than significant			

**Table 1-1
Summary of Impacts and Mitigations**

<i>Resource</i>	<i>Description of Impact</i>	<i>Mitigation</i>	<i>Residual Impact</i>
LRDP IMPROVEMENT PROJECTS			
High Technology/Classrooms/Offices (New Building)			
Visual Resources	The proposed structure would eliminate a paved, open space area and increase the building density of East Campus. Building design would be compatible with existing adjacent structures. The structure would be minimally visible from Pershing Park, but would not adversely affect any public view corridors.	None required.	Less than significant (Class III).
Multidisciplinary Classrooms (New Building)			
Air Quality	Earth moving activities associated with construction would generate combustive emissions (including ozone precursors) from heavy-duty grading equipment and fugitive dust (PM ₁₀) and would contribute to the County's nonattainment status. Fugitive dust emissions would have the potential to cause a public nuisance and/or exacerbate the County's PM ₁₀ nonattainment status. Combustive emissions from construction activities are relatively small compared to total emissions.	AQ-2: Incorporate dust control measures during construction, as described for the Life Science Geology Remodel.	Less than significant (Class II).
Archaeological Resources	The project site is located in the LRDP Archaeological Element moderate to high sensitivity area and extensive ground disturbance would be required for excavation of the subterranean first floor.	AR-2: Require a Phase 2 archaeological assessment by a City-qualified archaeologist to determine the significance of any cultural resources within the boundary of proposed ground disturbance. If archaeological deposits are found to be significant, perform a Phase 3 data recovery excavation to mitigate impacts from construction to less than significant.	Less than significant (Class II).
Geologic Processes	Construction grading would temporarily expose site soils to wind and water erosion, potentially causing short-term increases in erosion adjacent to the West Campus bluff. Increased impervious surfaces from building construction would concentrate water flow and potentially exacerbate bluff erosion.	LRDP Policy 2.1(a): If construction is to occur over the rainy season, identify temporary erosion control measures to minimize erosion of and from the site.	Less than significant (Class II).
<i>Notes:</i> Class I Significant, unavoidable Class II Significant, but reasonably mitigated Class III Adverse, but less than significant			

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Summary of Impacts and Mitigations**

<i>Resource</i>	<i>Description of Impact</i>	<i>Mitigation</i>	<i>Residual Impact</i>
LRDP IMPROVEMENT PROJECTS			
Multidisciplinary Classrooms (New Building)			
Geologic Processes (cont.)	Excavation for the first floor into the hillside would result in permanent changes to topography.	<p>LRDP Policy 2.1(b): Include the provision of positive drainage systems following natural drainage patterns of the campus in post-construction maintenance.</p> <p>LRDP Policy 1.1(d): Divert run-off from blufftop structures into drainage systems designed to eliminate sheet or gully erosion. Design drainage systems to maintain natural drainage patterns of established vegetated areas.</p> <p>GEO-1: Incorporate silt traps in all drainage system grates. Develop a maintenance plan to regularly clean these traps. Ensure that no vegetation cuttings or cleaning chemicals are placed in the drains.</p> <p>GEO-2: Direct all drainage system flow away from the mesa bluffs to avoid bluff erosion.</p> <p>The proposed structure is located a sufficient distance from the edge of the seaward bluff to provide a minimum of 75 years structural integrity from bluff retreat, precluding need for bluff stabilization devices.</p>	Less than significant (Class II).
<i>Notes:</i> Class I Significant, unavoidable Class II Significant, but reasonably mitigated Class III Adverse, but less than significant			

**Table 1-1
Summary of Impacts and Mitigations**

<i>Resource</i>	<i>Description of Impact</i>	<i>Mitigation</i>	<i>Residual Impact</i>
LRDP IMPROVEMENT PROJECTS			
Multidisciplinary Classrooms (New Building)			
Geologic Processes (cont.)	A possible unnamed, potentially active fault is exposed in the West Campus bluff, approximately 100 feet from the proposed building site. Potential ground surface rupture associated with an earthquake on this fault could result in structural damage and loss of use of building. Seismic activity from nearby or regional faults could produce severe ground motion on the Campus. Ground motion could result in structural damage and loss of use of buildings.	LRDP Policy 2.1(c): Design projects to sustain impacts and minimize damage to life and property. GEO-3: Complete a fault investigation in association with the possible unnamed fault identified in the west end of the West Campus bluff to determine whether the fault is active, potentially active, or inactive; or whether no fault actually exists. If a fault is identified, set back the structure a sufficient distance to minimize potential surface fault rupture to less than significant.	Less than significant (Class II).
Noise	Construction noise levels could reach 83 dBA at residences 200 feet to the west, and approximately 68 dBA at residences near Loma Alta Drive. Noise would temporarily substantially increase over existing levels, exceeding 60 dBA in residential areas during the 1.5 year construction period.	N-1: Limit construction activity and equipment maintenance to the hours between 7:00 A.M. and 5:00 P.M., Monday through Friday.	Less than significant (Class II).
Transportation and Parking	Short-term increases in employee traffic, truck trips, and heavy equipment trips from construction activity could cause short-term impacts to the campus parking and circulation system, as well as the adjacent street network.	TR-1: Implement a construction traffic management plan, as described for the Life Science Geology Remodel.	Less than significant (Class II)
Visual Resources	The proposed structure would have a similar height and overall mass as the adjacent Drama/Music Building, and would be compatible with this size and scale. It would slightly reduce existing grassy open space on West Campus. The structure would not be visible from any other public view points.	AES-1: Incorporate new pathways south of the Multidisciplinary Building into the College's existing public access network in order to enhance the views of the Pacific Ocean (e.g., picnic tables, benches, etc.).	Less than significant (Class III).
<i>Notes:</i> Class I Significant, unavoidable Class II Significant, but reasonably mitigated Class III Adverse, but less than significant			

Table 1-1
Summary of Impacts and Mitigations

<i>Resource</i>	<i>Description of Impact</i>	<i>Mitigation</i>	<i>Residual Impact</i>
LRDP IMPROVEMENT PROJECTS			
General Classrooms/Offices (New Building)			
Air Quality	<p>Earth moving activities associated with construction would generate combustive emissions (including ozone precursors) from heavy-duty grading equipment and fugitive dust (PM₁₀) from ground disturbances and would contribute to the County's nonattainment status.</p> <p>Fugitive dust emissions would potentially cause a public nuisance and/or exacerbate the County's PM₁₀ nonattainment status. Combustive construction emissions are relatively small compared to total emissions.</p>	AQ-2: Incorporate dust control measures during construction, as described for the Life Science Geology Remodel.	Less than significant (Class II).
Archaeological Resources	The project location is within the College's LRDP Archaeological Element low sensitivity area. There is a minimal potential for impacting archaeological resources during grading.	AR-1: In the event that unexpected cultural resources are encountered during grading, temporarily redirect construction until a City-qualified archaeologist can evaluate the significance of the find. If resources are of Native American origin, consult local tribal representatives.	Less than significant (Class II).
Geologic Processes	<p>Removal of the temporary structures and site preparation for building construction would temporarily increase the potential for wind and water erosion.</p> <p>Increases in surface runoff could result in adjacent bluff erosion due to the concentration of water flow from impervious surfaces.</p>	<p>LRDP Policy 2.1(a): If construction is to occur over the rainy season, identify temporary erosion control measures to minimize erosion of and from the site.</p> <p>LRDP Policy 2.1(b): Include the provision of positive drainage systems following natural drainage patterns of the campus in post-construction maintenance.</p> <p>GEO-1: Incorporate silt traps in all drainage system grates. Develop a maintenance plan to regularly clean these traps. Ensure that no vegetation cuttings or cleaning chemicals are placed in the drains.</p>	Less than significant (Class II).
<i>Notes:</i> Class I Significant, unavoidable Class II Significant, but reasonably mitigated Class III Adverse, but less than significant			

**Table 1-1
Summary of Impacts and Mitigations**

<i>Resource</i>	<i>Description of Impact</i>	<i>Mitigation</i>	<i>Residual Impact</i>
LRDP IMPROVEMENT PROJECTS			
General Classrooms/Offices (New Building)			
Geologic Processes (cont.)	Seismic activity and ground motion could result in structural damage and loss of use of buildings.	GEO-2: Direct all drainage system flow away from the mesa bluffs to avoid bluff erosion. LRDP Policy 2.1(c): Design projects to sustain impacts and minimize damage to life and property.	Less than significant (Class II).
Noise	Noise levels would temporarily exceed 65 dBA at Pershing Park, McKinley School, and nearby residences. Noise would temporarily exceed 60 dBA at residences.	N-1: Limit construction activity and equipment maintenance to the hours between 7:00 A.M. and 5:00 P.M., Monday through Friday.	Less than significant (Class II).
Transportation and Parking	Short-term increases in employee traffic, truck trips, and heavy equipment trips from construction activity could cause short-term impacts to the campus parking and circulation system, as well as the adjacent street network.	TR-1: Implement a construction traffic management plan, as described for the Life Science Geology Remodel.	Less than significant (Class II)
Visual Resources	The new structure would be more massive, but it would not degrade any public view corridors due to its location within the campus, surrounded by existing development.	None required.	Less than significant (Class III).
<i>Notes:</i> Class I Significant, unavoidable Class II Significant, but reasonably mitigated Class III Adverse, but less than significant			

LRDP BUILDOUT

Notes: Class I Significant, unavoidable Class II Significant, but reasonably mitigated Class III Adverse, but less than significant

**Table 1-1
Summary of Impacts and Mitigations**

<i>Resource</i>	<i>Description of Impact</i>	<i>Mitigation</i>	<i>Residual Impact</i>
LRDP BUILDOUT			
5-Year Buildout			
Transportation and Parking	<p>Enrollment increases would add 70 A.M. PHT and 84 P.M. PHT to U.S. 101 west of Castillo and 44 A.M. PHT and 54 P.M. PHT to U.S. 101 east of Castillo. These traffic additions exceed the CMP roadway thresholds.</p> <p>Increased enrollment would result in parking demand of an additional 290 spaces, increasing the total demand to 2,857 spaces under the 5-Year scenario. There would be a potential shortfall of 361 spaces.</p>	<p>TR-1: Develop a Transportation Demand Management (TDM) Plan to reduce traffic generation at the College, thereby reducing impacts to U.S. Highway 101 including: increase number of carpool spaces to between 15 and 25% of the total spaces on campus, based on evaluation of the TDM implementation; develop an all-weather bus stop at the campus if agreed to by the MTD; provide transit passes to maximize recent increases in College public transit routes; measures to enhance transit ridership including considering funding transit related College improvements off of the main College campus; provide vanpooling incentives; provide incentives for bicycle use; provide emergency transportation services; implement varying class times outside peak parking demand periods; increase Internet classes; increase off-campus classes. Provide marketing plan for TDM participation. Design plan with input from participants, and appoint a TDM plan administrator.</p> <p>TR-2: Include in the TDM plan targets to reduce parking demands at the site, thereby reducing future parking needs.</p>	Less than significant (Class II).
<p><i>Notes:</i> Class I Significant, unavoidable Class II Significant, but reasonably mitigated Class III Adverse, but less than significant</p>			

**Table 1-1
Summary of Impacts and Mitigations**

<i>Resource</i>	<i>Description of Impact</i>	<i>Mitigation</i>	<i>Residual Impact</i>
LRDP BUILDOUT			
5-Year Buildout			
Transportation and Parking (continued)	See previous page.	TR-3: Construct an additional parking structure when the City of Santa Barbara and the College Administration jointly determine that residual parking demands, taking into account the actual and reasonably anticipated gains from the implementation of TDM programs and new and expanded MTD service, would exceed available supplies. A structure is not currently defined, but could include: Parking Lot 4, on West Campus; Parking Lot 3, on campus at the northwest corner of Loma Alta Drive/Shoreline Drive ; and the Pershing Park Lot. A potential structure location would be subject to a subsequent review under CEQA, when the City of Santa Barbara and the College determine that existing parking facilities and TDM Plan programs are inadequate to provide for projected demand.	Less than significant (Class II).
	Estimated 5-Year student increases would generate 3,006 ADT, 222 A.M. PHT and 266 P.M. PHT. Surface streets would operate acceptably at LOS C or better with the volumes resulting from LRDP 5-Year Buildout + approved City projects, and would not exceed CMP roadway thresholds.	None necessary.	Less than significant (Class III)
	Project area intersections would operate at LOS C or better during the A.M. and P.M. peak hour periods with the addition of traffic generated by the project and would not exceed CMP or City of Santa Barbara intersection thresholds.	None necessary.	Less than significant (Class III)
<i>Notes:</i> Class I Significant, unavoidable Class II Significant, but reasonably mitigated Class III Adverse, but less than significant			

Table 1-1

Resource	Description of Impact	Mitigation	Residual Impact
LRDP BUILDOUT			
10-Year Buildout			
Air Quality	<p>Daily vehicle traffic associated with LRDP 10-year buildout would produce 31 and 58 pounds of ROC and NO_x emissions, respectively. NO_x emissions would exceed the APCD operational threshold of 25 pounds per day.</p> <p>LRDP 10-year buildout traffic emissions would contribute to levels of ambient CO at U.S. Highway 101 between Castillo and east of Milpas Streets during the A.M. and P.M. peak hours, expected to exceed the Santa Barbara County Association of Governments (SBCAG) Congestion Management Plan standards.</p>	AQ-3: Develop a Transportation Demand Management (TDM) Plan to reduce vehicle trips and their associated emissions from the LRDP (see Mitigation Measure TR-1 for TDM Plan details).	<p>Significant for ROC and NO_x (Class I)</p> <p>Less than significant (Class II).</p>
Public Services	<p>In 10 years, water use on campus would increase by 23 percent (18 AFY) to 95 AFY. The College would constitute less than 0.5 percent of the City's overall water demand, consistent with existing water usage, and would not increase the City's water demand beyond projected supplies.</p> <p>Sewer service demand in 10 years would increase 22 percent (77,200 gpd) and would not exceed the City's wastewater treatment plant's capacity.</p>	None required.	Less than significant (Class III).
	<p>In 10 years, solid waste generation would increase by approximately 22 percent, or 180 tons per year (0.6 tons per day) over existing levels. This projected annual increase would be below the 195 tons per year threshold. The College would continue to implement recycling of paper products (office paper and newspaper), glass and aluminum at food service venues to reduce this demand.</p>	None required.	Less than significant (Class III).
<p>Notes: Class I Significant, unavoidable Class II Significant, but reasonably mitigated Class III Adverse, but less than significant</p>			

**Table 1-1
Summary of Impacts and Mitigations**

<i>Resource</i>	<i>Description of Impact</i>	<i>Mitigation</i>	<i>Residual Impact</i>
LRDP BUILDOUT			
10-Year Buildout			
Transportation and Parking	LRDP 10-Year Buildout operations would add 134 A.M. PHT and 161 P.M. to U.S. 101 west of Castillo and 83 A.M. PHT and 99 P.M. to U.S. 101 east of Castillo, a potential impact according to CMP criteria. Increased enrollment would result in parking demand of an additional 546 spaces, increasing the total demand to 2,970 spaces under the 10-Year scenario. There would be a potential shortfall of 630 spaces.	TR-1: Develop a Transportation Demand Management (TDM) Plan to reduce traffic generation at the College, thereby reducing impacts to U.S. Highway 101 including: increase number of carpool spaces to between 15 and 25% of the total spaces on campus, based on evaluation of the TDM implementation; develop an all-weather bus stop at the campus if agreed to by the MTD; subsidize transit passes to maximize recent increases in College public transit routes; measures to enhance transit ridership including considering funding transit related College improvements off of the main College campus; provide vanpooling incentives; provide incentives for bicycle use; provide emergency transportation services; implement varying class times outside peak parking demand periods; increase Internet classes; increase off-campus classes. Provide marketing plan for TDM participation. Design plan with input from participants, and appoint a TDM plan administrator. TR-2: Include in the TDM plan targets to reduce parking demands at the site, thereby reducing future parking needs.	Less than significant (Class II).
<i>Notes:</i> Class I Significant, unavoidable Class II Significant, but reasonably mitigated Class III Adverse, but less than significant			

Table 1-1
Summary of Impacts and Mitigations

<i>Resource</i>	<i>Description of Impact</i>	<i>Mitigation</i>	<i>Residual Impact</i>
LRDP BUILDOUT			
10-Year Buildout			
Transportation and Parking (cont.)	See previous page.	TR-3: Construct an additional parking structure when the City of Santa Barbara and the College Administration jointly determine that residual parking demands, taking into account the actual and reasonably anticipated gains from the implementation of TDM programs and new and expanded MTD service, would exceed available supplies. A structure is not currently defined, but could include: Parking Lot 4, on West Campus; Parking Lot 3, on campus at the northwest corner of Loma Alta Drive/Shoreline Drive; and the Pershing Park Lot. A potential structure location would be subject to a subsequent review under CEQA, when the City of Santa Barbara and the College determine that existing parking facilities and TDM Plan programs are inadequate to provide for projected demand.	Less than significant (Class II).
	Projected enrollment increases for the 10-Year scenario are expected to generate 5,670 ADT, 418 A.M. PHT and 501 P.M. PHT. All of the surface streets are forecast to operate acceptably at LOS C or better.	None necessary.	Less than significant (Class III).
	Project area intersections would operate at LOS C or better during the A.M. and P.M. peak hour periods with the addition of traffic generated by the project.	None necessary.	Less than significant (Class III).
<i>Notes:</i> Class I Significant, unavoidable Class II Significant, but reasonably mitigated Class III Adverse, but less than significant			

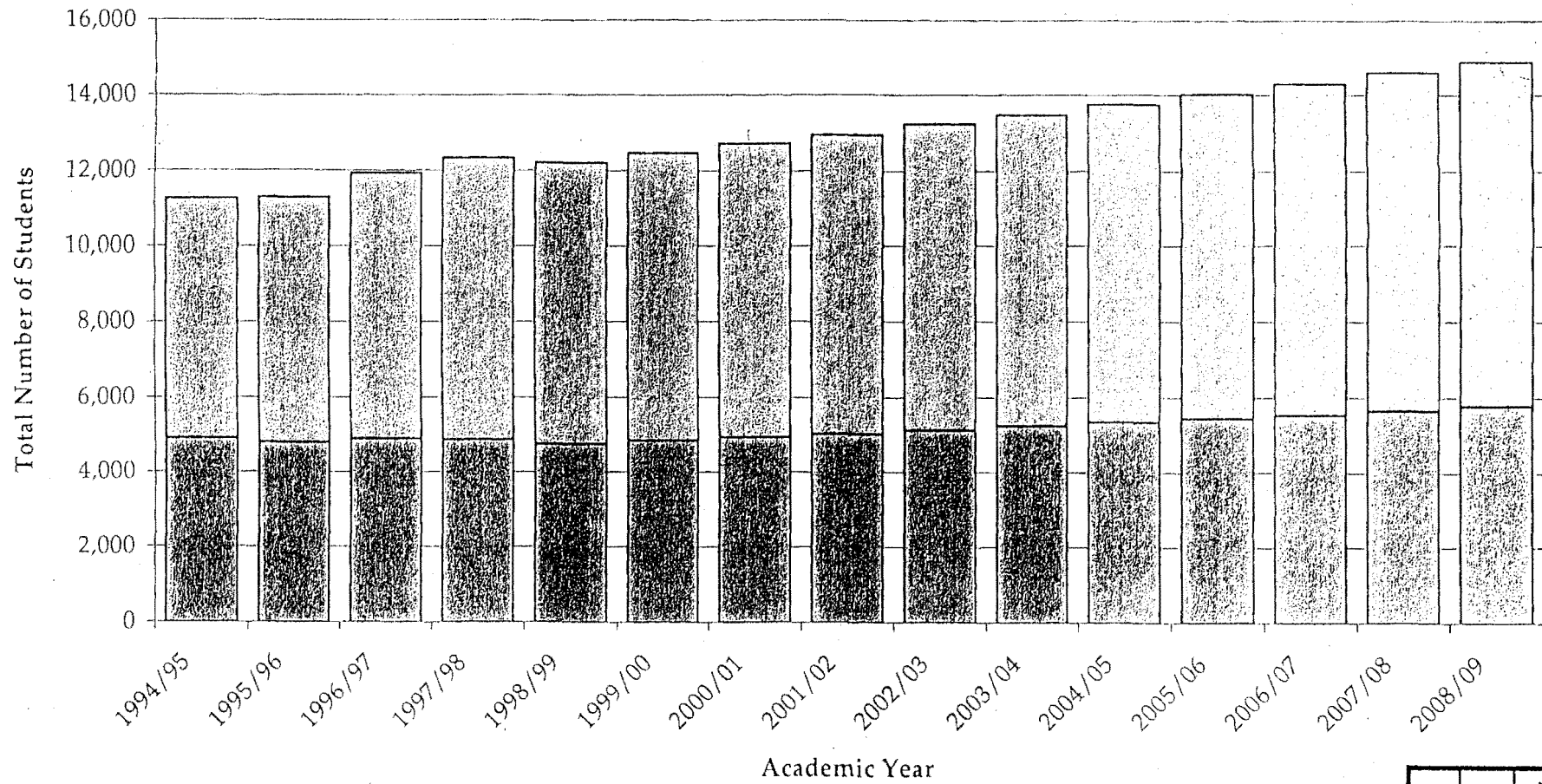
**Table 1-2
Other Issue Areas**

<i>Resource</i>	<i>Issue</i>	<i>Resolution</i>
LRDP BUILDOUT		
5-Year Buildout		
<p>Housing</p> <p><i>(Housing is a socioeconomic issue and not considered an environmental impact under CEQA. The EIR addresses this issue to provide full disclosure of planning issues).</i></p>	<p><i>(The following is considered a planning issue only).</i></p> <p>Projected increases in students, faculty and staff would create an estimated increase in housing demand for approximately 224 housing units over the 5-year period, or approximately 45 units/year. Assuming average development of 457 new housing units/year, College housing demand would comprise approximately 10 percent of the potential increase in the number of local housing units. The private housing market would likely not build housing to meet student housing demand. In the absence of additional housing, vacancy rates may decrease, and this could place upward pressure on rents, create overcrowding, and an atmosphere of increased density and more illegal housing units.</p>	<p><i>(Mitigation of housing issues is not required under CEQA. The following is recommended to address this planning concern).</i></p> <p>With the City of Santa Barbara as the lead, the College will work with the City, the County of Santa Barbara, and local housing agencies and business and financial interests to develop a cooperative program wherein these participating interests will combine resources, according to their abilities and limitations, to contribute to the affordable housing supply for College students and staff. Within this effort, the College will seek innovative ways to leverage both its funding and administrative/management capabilities toward the provision of such housing. For its part, the College will make all reasonable efforts to have the program in effect prior to the construction of the next new classroom building in the LRDP.</p>

Table 1-2
Other Issue Areas

Resource	Issue	Resolution
LRDP BUILDOUT		
10-Year Buildout		
<p>Housing</p> <p><i>(Housing is a socioeconomic issue and not considered an environmental impact under CEQA. The EIR addresses this issue to provide full disclosure of planning issues).</i></p>	<p><i>(The following is considered a planning issue only).</i></p> <p>Projected increases in students, faculty and staff would create an estimated increase in housing demand for approximately 471 units over the 10-year period, an average of approximately 47 units/year. Assuming average development of 425 new housing units/year, College housing demand would comprise approximately 11 percent of the potential increase in the number of local housing units. The private housing market would likely not build housing to meet student housing demand. In the absence of additional housing, vacancy rates may decrease, and this could place upward pressure on rents, create overcrowding, and an atmosphere of increased density and more illegal housing units.</p>	<p><i>(Mitigation of housing issues is not required under CEQA. The following is recommended to address this planning concern).</i></p> <p>With the City of Santa Barbara as the lead, the College will work with the City, the County of Santa Barbara, and local housing agencies and business and financial interests to develop a cooperative program wherein these participating interests will combine resources, according to their abilities and limitations, to contribute to the affordable housing supply for College students and staff. Within this effort, the College will seek innovative ways to leverage both its funding and administrative/management capabilities toward the provision of such housing. For its part, the College will make all reasonable efforts to have the program in effect prior to the construction of the next new classroom building in the LRDP.</p>

Figure 2-1
Historic and Projected Enrollment



□ Part Time Students
 ■ Full Time Students

