

SAVE STRAWBERRY CANYON

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Via Electronic Mail jmcdougall@cp.berkeley.edu

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Re: 2020 LRDP Addendum to Address Climate Change

Dear Ms. McDougall,

Save Strawberry Canyon welcomes the opportunity to comment on potential climate change impacts from proposed 2020 LRDP development especially as it relates to Strawberry Canyon and natural resources in the area.

UC Berkeley has proposed, and in some cases enacted, various development projects which were not included in the 2020 LRDP. As such, our first concern is whether the 2020 LRDP remains a comprehensive document against which climate change impacts can be analyzed.

The following development projects have been proposed since the 2020 LRDP was certified:

- a. The recently announced stadium “reconstruction” at the mouth of Strawberry Canyon.
- b. Expanded scope of hill campus development including the Helios Energy Research Facility (Helios). As stated in the now decertified EIR for the Helios project, “Once constructed, the facility would be operated and managed by UC Berkeley.” (p.3.0-1, Helios DEIR). The 2020 LRDP EIR identified up to 100,000 GSF of “net new academic and support space in the Hill Campus.” (p.4.3-17, 2020 LRDP DEIR) Yet the Helios building alone proposed in the second version of the project exceeds that amount by 44,000 gsf. Moreover, the Computational Research and Theory Facility (CRT) – a 140,000 gsf building – would house the joint UC Berkeley/Berkeley Lab Computational Science and Engineering program.

- c. Fire Fuel mitigations programs in Strawberry and Claremont Canyons.
The scope of the fire fuel mitigations exceed that which was described in the 2020 LRDP or at least it appears that way from the scope of the 2020 LRDP Biological Resources Impact Analysis. The fire fuel mitigation programs are quite extensive and include “the removal of 66 acres of eucalyptus trees in Strawberry Canyon... (and the)removal of 45 acres of eucalyptus trees in Claremont Canyon” which will in combination total “over 23,000 trees will be removed in this effort.” <http://oep.berkeley.edu/news/2006/index.html#FEMAGrants> retrieved 7/5/09.

At question is whether there have been substantial changes since certification of the 2020 LRDP. If there are substantial changes, then it would seem a supplemental EIR would be more appropriate than the Addendum to the EIR provided here.

Among the types of impacts from proposed development not previously considered in the program EIR and which would also have climate change impacts are the following:

- a. Increased commute traffic from increased use of the reconstructed stadium.
- b. Increased truck traffic from demolition and reconstruction of the stadium.
- c. Air quality impacts from increased truck traffic during stadium reconstruction
- d. Lost carbon sequestration from wide-scale tree removal that cannot be feasibly mitigated with a 3 to 1 ratio replanting scheme.

A related question is whether the geographic boundary for UC Berkeley’s entry in the California Climate Action Registry includes the Hill Campus. The Hill Campus is included in the 2020 LRDP but not, apparently, the inventory prepared for the registry. As quoted from the Addendum: “The geographic boundary for the inventory is generally defined as those buildings central to the University mission and under operational control of the campus. This includes central campus buildings, all student housing, and off-central campus facilities in the Bay Area owned by the University including the Richmond Field Station.”

The University of California’s policy on sustainable practices is admirable in many ways. However, one of the deficiencies is in the area of conservation and reuse of existing buildings. The Addendum does not analyze the relative greenhouse gas (GHG) emissions from reusing an old building compared to building a new one.

The University’s analysis would also seem to fail if it is true that the analysis does not include GHG emissions from construction vehicles. Please clarify as to whether the emission source is attached to the contractor but not the developer. This would be unfortunate given that it is the developer’s choice as to whether new buildings are constructed in the first place. Moreover, it is not enough to build to LEED standards when greening existing buildings might be more economically viable as well as more sustainable.

Also please clarify as to whether GHG emissions from demolition are included in the analysis.

The developer not only chooses whether to build but also where to build. And some locations would create more GHG emissions than others. For example, the Hill Campus and LBNL Campus are not in walking distance to the Central Campus and are far away from restaurants and other amenities.

Locations also matter in terms of the types of carbon resources which are lost during construction. This was seen most dramatically when a grove of oak trees was cut down to build the Student Athlete High Performance Center. How many years will it take before the newly planted trees will sequester as much carbon as the mature trees did?

Thank you for considering these thoughts and carefully considering these questions.

Yours sincerely,

Janice Thomas
Secretary, Save Strawberry Canyon