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Anya Spear, AICP, LEED AP
CSUMB Office of the President
100 Campus Center, building 1
Seaside, CA 93955

Dear Anya Spear and the CSUMB Master Plan team,

On behalf of LandWatch Monterey County, EcoDataLab has reviewed the CSUMB Final EIR (FEIR). Thank you for addressing our previous comments and significantly strengthening CSUMB's commitment to achieve meaningful greenhouse gas reductions, in line with CSU and state policy.

In our original letter, we noted errors in the Draft EIR's (DEIR) threshold of significance. The DEIR set a 47% reduction target by 2035, but used EO S-3-05 and included agriculture when evaluating applicable sources of emissions.

The FEIR corrected both of these errors. By incorporating CSU's recently updated sustainability policy and correcting the calculations, the FEIR's total reduction target rose to 56%.

We also asked that the same inventory be used both to establish the threshold of significance and to determine the incremental emissions from the project. In the DEIR, the STARS inventory (a larger number) was used as a baseline for determining the threshold of significance, while the CalEEMod inventory (a smaller number) was used for determining the incremental emissions resulting from the project. This approach understated the emissions reduction needed to meet the percentage reduction target.

CSUMB went a step further than expected. First, CSUMB updated the emissions calculations from vehicle miles traveled (VMT) in CalEEMod. CSUMB then reviewed both the STARS and CalEEMod inventories and selected the more stringent



calculation for setting thresholds of significance – in this case, the STARS inventory. This has resulted in a substantially lower threshold of significance, of only 2,747 MT CO₂e/yr – down from 3,334 MT CO₂e/yr, and much lower than the revised CalEEMod estimate would have produced at 4,824 MT CO₂e/yr. We commend CSUMB for this step to ensure additional protection for our planet.

Our original letter brought up a discrepancy in the VMT estimates used to generate emissions and the VMT estimates used to analyze overall VMT impacts from the project. The FEIR corrected this issue, by adjusting the default vehicle trip lengths to ensure that the average daily weekday VMT used in CalEEMod matched those estimated in the EIR Section 4.13 Transportation. While this resulted in significant increases to the overall estimated emissions from the campus and the project, it was the correct step to take, to ensure the full scope of addressable impacts are taken into account.

It is worth noting that the updated transportation emissions from the project are only marginally (~10%) higher than the existing baseline. This is because the CSUMB Master Plan does an excellent job at prioritizing the provision of new housing on-campus, close to destinations frequently visited by students and staff, and also supports and encourages the use of alternative transportation. It is no small feat to double a campus' population with only a 10% increase in transportation emissions; CSUMB's master plan sets an example for other universities to follow.

With these updated emissions estimates and more stringent targets, CSUMB is now required to achieve substantially greater emissions reductions. The DEIR set the required mitigations at 600 MT CO₂e/yr; in the FEIR, these mitigation measures have been scaled up to achieve 2,068 MT CO₂e/yr in reductions – more than triple the original amount of reductions. Notably, CSUMB has committed to achieving all of these emission reductions through avoiding or reducing the use of natural gas. Campuswide, this is a 54% reduction in expected use of natural gas. However, if met exclusively through the buildings proposed in the project – as is likely, given the cost and engineering challenges present in retrofitting existing buildings – this will mean a minimum *93% reduction* in natural gas usage in new buildings from the project.

This is an ambitious commitment to ensure virtually gas-free new construction (with potentially limited exceptions for certain laboratory or cooking facilities), and is commendable.



Our original letter also raised objections that the DEIR included no measures to ensure the anticipated waste diversion and reduction numbers were actually achieved. We are happy to see the FEIR incorporates additional Project Design Features (PDFs) to ensure ongoing implementation of CSUMB's Materials Management and Conservation Plan (MMCP), including hiring a zero waste and sustainability staff person to oversee implementation.

We firmly believe that using natural gas for cooking conflicts with CSU EO 987 because natural gas is unquestionably inefficient, and data shows it endangers public health and safety by generating substantial indoor air pollution and posing significant risk of fire. We will provide public comment at the individual development level to ensure conformance with the then-applicable version of the ICSUAM and EO 987.

Overall, however, we believe the FEIR adequately addressed our comments. We applaud CSUMB's efforts to ensure comprehensive, rigorous, and stringent environmental protections through its revisions.

Sincerely,

A handwritten signature in black ink that reads "Ben Gould". The signature is written in a cursive, slightly slanted style.

Ben Gould, MPP, MS
President, EcoDataLab

